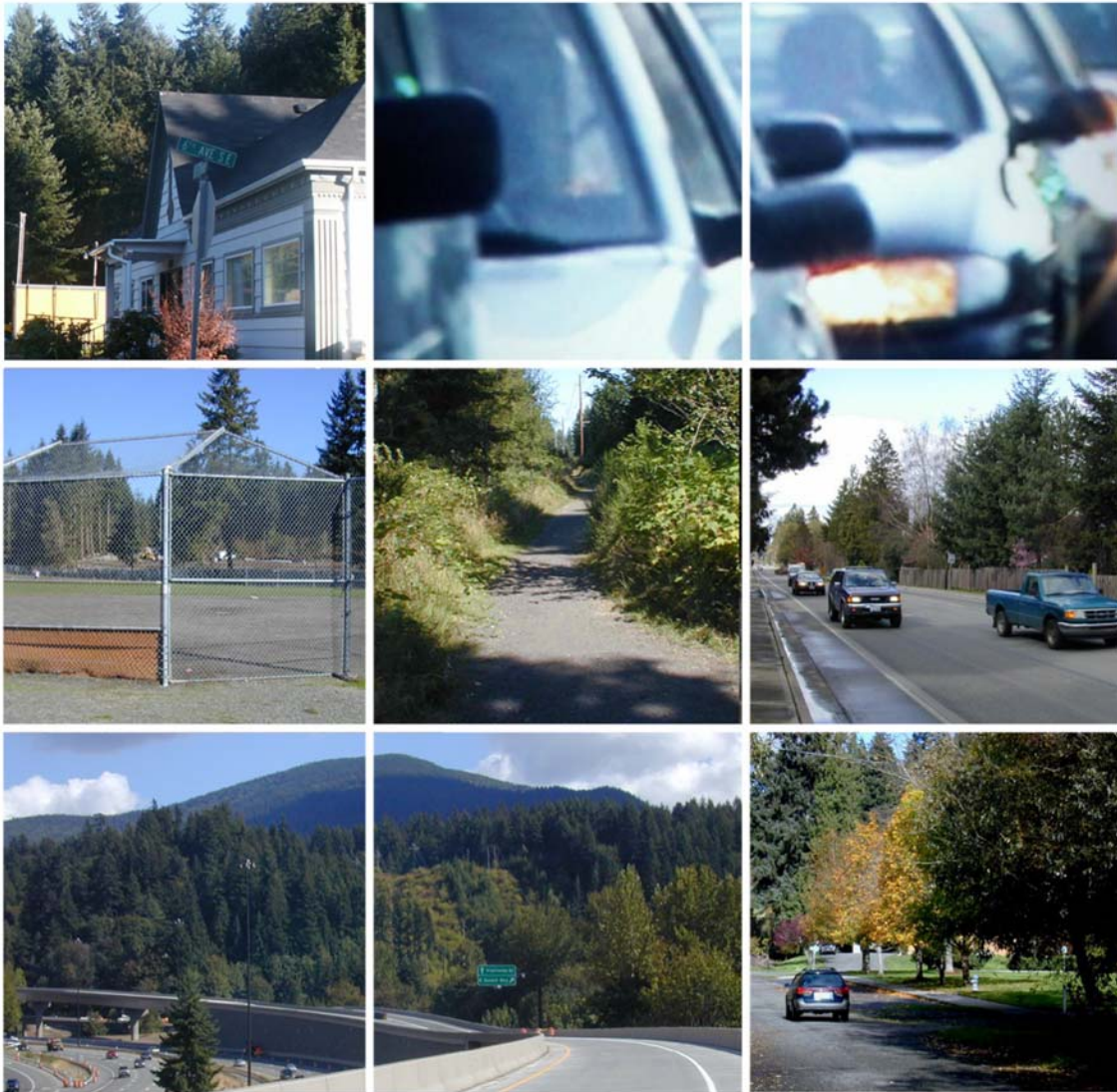


# SOUTHEAST ISSAQUAH BYPASS

## Final Environmental Impact Statement and Section 4(f) Evaluation

December 2007

### Volume 2 Comment Letters and Technical Appendices



U.S. Department of Transportation  
Federal Highway Administration



Washington State  
Department of Transportation



Printed on Recycled Paper

# **Southeast Issaquah Bypass**

**Final**

**Final Environmental Impact Statement  
and Section 4(f) Evaluation**

**December 2007**

## **Volume 2: Comment Letters and Technical Appendices**



U.S. Department of Transportation  
Federal Highway  
Administration



Washington State  
Department of  
Transportation





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***June 2004 Supplemental Draft  
Environmental Impact Statement  
Comment Letters and Responses***

## **Comment Letters and Responses**

Following are comment letters and responses to comments on the Southeast Issaquah Bypass Supplemental Draft Environmental Impact Statement (Supplemental Draft EIS) issued in June 2004. Under National Environmental Policy Act (NEPA) regulations the comment period followed issuance of the Supplemental Draft EIS and provided agencies and interested individuals with a 45-day period in which to provide comments on the Supplemental Draft EIS. As required by NEPA, a public meeting was held on July 15, 2004 at Issaquah High School to collect additional input on the Supplemental Draft EIS. Responses to these comments are provided for each letter. This section has been divided into letters from agencies, letters from individuals, and public hearing comments. In addition, the City of Issaquah received several postcards during this period in support of the proposed project. These cards are also reproduced here at the end of this section.

## **Agency Comment Letters**





STATE OF WASHINGTON

**Office of Archaeology and Historic Preservation**

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501  
 (Mailing Address) PO Box 48343 • Olympia, Washington 98504-8343  
 (360) 586-3065 Fax Number (360) 586-3067

July 27, 2004

Mr. Trevin Taylor  
 Environmental Engineer  
 Washington Department of Transportation  
 310 Maple Park Ave. SE  
 P.O. Box 47300  
 Olympia, Washington 98504-7300

In future correspondence please refer to:

Log: 053003-01-I-IWA

Property: City of Issaquah Southeast Bypass Cultural Resources Determination

Re: Review Comments

Dear Mr. Taylor:

Thank you for contacting the Washington State Office of Archaeology and Historic Preservation (OAHP). The above referenced project has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication. Review comments from the Washington State Office of Archaeology and Historic Preservation have been requested regarding the City of Issaquah Southeast bypass Draft Supplemental Environmental Impact Statement. I have received and reviewed this document from your office dated June 1, 2004. This office is requesting more information prior to a determination being made.

As noted on Page 4-197, Alternatives 3, 4 will have an adverse effect on the Issaquah Sportsmen's Clubhouse by changing the setting or relocating the historic structure.

Alternatives 2, 4, and 6 will put the bypass in close proximity to both the White Swan Inn and the Campbell house. According to the Revised Cultural Resources Technical Report both historic structures retains enough surrounding to suggest a semi-rural character of the areas where these structures were built. Changes that involve bringing the bypass into close proximity to these historic structures have the potential to create an adverse effect that would require mitigation.

This office is also concerned by lack of attention paid to Deputy State Historic Preservation Officer, Greg Griffith's letter to WSDOT dated, May 30, 2003. In that letter, Mr. Griffith referenced the potential of adverse effects (such as those stated above) and the probability that the project would necessitate a Memoranda of Agreement. On page 4-199, though an MOA is specified, it excludes signatories such as the Advisory Council for Historic Preservation, Federal Highways Administration, and the Office of Archaeology

1. After issuance of the SDEIS, changes were made to Alternative 5, resulting in Modified Alternative 5, and this was chosen as the preferred alternative because it is the only build alternative that meets Purpose and Need and has impacts that can be effectively mitigated. All other build alternatives considered in the SDEIS would either have unacceptable impacts to 4(f) resources or would not meet Purpose and Need.

2. Since issuance of the SDEIS, the City and the Washington State Department of Transportation (WSDOT) have coordinated with Office of Archaeology and Historic Preservation (OAHP) regarding impacts on historic and cultural resources for Modified Alternative 5. OAHP responded in January 2005 and has indicated that "the proposed project "will have no adverse effect on National Register eligible or listed historic and cultural resources." A copy of the OAHP letter is provided in Chapter 6 of this Final EIS.

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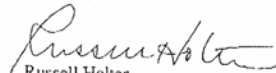
FAX NO. 3607056822

P. 03

Mr. Taylor  
July 27, 2004  
Page 2  
and Historic Preservation.

Thank you for the opportunity to review and comment. Should you have any questions, please contact me.

Sincerely,



Russell Holter  
Project Compliance Reviewer  
(360) 586-3533  
[russellh@cted.wa.gov](mailto:russellh@cted.wa.gov)

Cc: Julie Koler (KingCo)

ADMINISTERED BY DEPARTMENT OF COMMUNITY, TRADE & ECONOMIC DEVELOPMENT



## Issaquah School District No. 411

565 NW Holly Street • Issaquah, WA 98027-2899 • Phone (425) 837-7000

Janet N. Barry, Ed. D.  
Superintendent

July 30, 2004

Mayor Ava Frisinger  
City of Issaquah  
PO Box 1307  
Issaquah, WA 98027 – 1307

RECEIVED

AUG 02 2004

PUBLIC WORKS ENG.

### RE: SCHOOL DISTRICT INPUT ON DRAFT SUPPLEMENTAL EIS

Dear Mayor Frisinger:

Thank you for the opportunity to comment on the June 2004 Draft Supplemental Environmental Impact Statement (DSEIS) for the proposed SE Issaquah Bypass. District staff have studied the document in detail and found it adequate to characterize the impacts to school district properties. The following comments, which include some matters still wanting resolution, are provided for your consideration.

**Focus on School Facilities and Operations.** In reviewing the DSEIS, the School District's three primary objectives are as follows:

1. Protect the learning environment for students and staff at Issaquah High School, Clark Elementary, and Tiger Mountain Community High School.
2. Maintain safe conditions for students, staff and visitors to school district properties.
3. Ensure long-term efficient operation of the schools listed above and the District Transportation Center.

All four facilities identified above are important community assets located in close proximity to the proposed bypass routes. All except Tiger Mountain have primary entrances on 2<sup>nd</sup> Avenue SE; all four are located in close proximity to the roadway—that is, they have relatively limited setbacks from the street which serves as the *de facto* “no build” alternative.

**Overview of Specific Impacts.** As stated in a March 2004 letter from Capital Projects Director Steve Crawford, the District believes all seven alternatives, including the “no build” alternative, will impact District operations and resources. Specifically:

- Alternatives 1 and 2 impact school facilities so severely that they are unacceptable to the School District.
- Alternative 3 does not overlay or conflict with the location of existing school structures or facilities; thus, it is the alternative of least impact to 2<sup>nd</sup> Avenue schools.

1

1 After issuance of the SDEIS, changes were made to Alternative 5, resulting in Modified Alternative 5, and this was chosen as the preferred alternative because it is the only build alternative that meets Purpose and Need and has impacts that can be effectively mitigated. All other build alternatives considered in the SDEIS would either have unacceptable impacts to 4(f) resources or would not meet Purpose and Need.

#### Board of Directors

Constance L. Fletcher • Larry W. Ishmael • Mark Warner • Michael Winkler • Jan Woldseth

- Alternative 4 matches the northern alignment of Alternative 3, but follows closer to school facilities in the southern portion of the route. For this reason, it is less acceptable than Alternative 3. (If either were selected as a “build” solution, the District would expect to participate in design work to minimize school impacts.)
- Alternatives 5 and 6 have the same impacts to school facilities in the northern portion of the route. While we believe these can be mitigated within reasonable parameters, we do have continuing concern on several matters and have, therefore, provided more detailed discussion of this alignment below.
- Without significant action to stem projected traffic increases on 2<sup>nd</sup> Avenue SE, Alternative 7 (the “no build” alternative) would also be unacceptable to the District. More detailed discussion of this point is also provided below.

**School Facility Issues to be Resolved in Alternative 5 or 6.** While we believe the impacts of this alignment can be reasonably mitigated if Alternative 5 or 6 is selected, we want to enter specific concerns into the record for future resolution.

**First,** Alternative 5 and Alternative 6, the DSEIS preferred alternative take a portion of the Issaquah High School softball fields for the proposed roadway. The DSEIS notes that mitigation must be provided, but does not specify what that mitigation will be. It is essential that the high school retain two softball fields, as this is a federally protected condition for female athletes that cannot be compromised. For this reason, we would expect to have District representatives participate in design work to resolve this matter.

**Second,** while it is clear that District facilities will be impacted by increased noise, Alternatives 5 and 6 do not project a need for noise mitigation. It is our view that FHWA and WSDOT “reasonableness” criteria may not be adequate to preserve the current educational environment, and we will want to discuss this and other matters further if the project goes forward to a design phase. In this matter, I would point back to the assurances you offered in a May 2001 letter addressed to me and written jointly with then Council President Fred Kempe:

*We have always said our goal at the School facilities has been to build a street, if that is the final decision, with the least possible noise impact reasonably possible. We have never suggested we would accept federal or state standards that we believe may well be higher than you or we would want, and we have not capped our responsibilities financially. Ultimately, financial ability will factor into the decision as it always does, but that is true of the project at large and not specific to any feature more than any other feature.*

**Alternative 7: The “No Build” / 2<sup>nd</sup> Avenue Alternative.** Traffic counts on 2<sup>nd</sup> Avenue SE have continued to increase since the opening of the Sunset Interchange. Both the DSEIS and the Neighborhood Mitigation Study (Entranco, 2002) conclude that unrelieved traffic congestion on Front Street will continue to substantially increase neighborhood cut-through traffic, primarily on 2<sup>nd</sup> Avenue SE, along the front of four school district facilities.

1

1. After issuance of the SDEIS, changes were made to Alternative 5, resulting in Modified Alternative 5, and this was chosen as the preferred alternative because it is the only build alternative that meets Purpose and Need and has impacts that can be effectively mitigated. All other build alternatives considered in the SDEIS would either have unacceptable impacts to 4(f) resources or would not meet Purpose and Need. The District would be involved in the design effort to incorporate appropriate measures to mitigate impacts to school facilities.

2

2. Alignment North C will impact the northeast corner of the high school softball field. This impact will be fully mitigated on site with grading, reconfiguration of one of the baseball fields, and realignment of two fences. The high school softball field is a 4(f) and Title 9 property and the impact of the roadway will be fully mitigated to the satisfaction of the high school administration. Discussions have been held with the school district administration and the proposed mitigation is acceptable to the Issaquah School District and the high school. Both diamonds will remain fully useable.

3

3. The City of Issaquah is currently working with the Issaquah School District regarding the noise abatement proposed as part of the project.

4



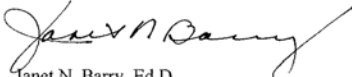
Continued increases in the volume of 2<sup>nd</sup> Avenue traffic will compound safety issues, erode school environments, drive down efficiency, and increase operational cost at the District's Transportation Center—all matters that would require mitigation to adequately serve the public.

**Summary.** If a "build" alternative is selected, some further specificity is needed regarding the mitigation of impacts to ensure that we retain a safe, high quality educational environment and efficient school transportation services for this community. We believe the impacts can be reasonably addressed in the design phase and would expect to participate with you to develop appropriate solutions.

If a "no build" alternative is selected, such a decision must include plans to limit the projected volume of cut-through traffic on 2<sup>nd</sup> Avenue SE and otherwise address issues related to safety, health, noise and efficient access to four school district facilities.

Thank you for your attention to our perspective in this important public conversation. It is a complex matter. Like you, we come to it as stewards of this community's key assets and look forward to working with you in the later phases of decision-making.

Sincerely,



Janet N. Barry, Ed.D.  
Superintendent

*Copies:*

*Leon Kos, City Manager*

*Bob Brock, Public Works Director*

*City Council*

*ISD Board of Directors*

*Steve Crawford, Director of Capital Projects, ISD*

4

4. Your comments have been noted and will be considered in the decision for selecting the preferred alternative.

5

5. The City is committed to working with the School District during the design process to ensure all concerns are addressed, to ensure a high quality school environment is achieved. Should the no-action alternative be selected, relieving congestion on 2<sup>nd</sup> Avenue SE will certainly remain as one of the primary issues that need to be addressed by alternative transportation improvements.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

RECEIVED  
AUG 02 2004  
PUBLIC WORKS ENG.

July 29, 2004

Reply To  
Attn Of: ETPA-088

Ref: 96-091-FHA

Mr. Peter Eun  
Federal Highway Administration  
711 South Capitol Way, Suite 501  
Olympia, Washington 98501

Dear Mr. Eun:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Supplemental Environmental Impact Statement and Section 4(f) Evaluation (DSEIS) for the **Southeast Issaquah Bypass** (CEQ No. 040255). We are submitting comments pursuant to our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. Thank you for accepting our comments.

The DSEIS provides changes and new information since the first Draft EIS issued in year 2000. Key features include:

- a traffic modeling analysis to the year 2030 rather than 2015;
- examination of a 4-lane facility rather than a 2-lane roadway;
- elimination of the South B alignment;
- modification of the South A alignment; and
- addition of a new South C alignment.

Alternative 6, which includes the North C and South C alignments, is presented as the preliminary preferred alternative. EPA appreciates the work that went into exploring other design options and realignment to reduce wetland impacts, particularly for Alternative 6.

The DSEIS also includes more information about the affected environment and environmental consequences of the proposed action. In particular there is more information on water quality in the Issaquah Creek Basin and Lake Sammamish, the lack of stream flows, flooding, groundwater recharge functions, and brief discussion of the Issaquah Creek Nonpoint Action Plan and the Issaquah Creek Valley Groundwater Management Plan. EPA especially commends the project proponents for incorporating wildlife crossings into the proposed project, and for completing a study that recommended a new transit center be located near the existing Issaquah Park-and-Ride location. We are encouraged that the City and Sound Transit are moving forward with preliminary design of the recommended site.

1

1. After issuance of the SDEIS, changes were made to Alternative 5, resulting in Modified Alternative 5, and this was chosen as the preferred alternative because it is the only build alternative that meets Purpose and Need and has impacts that can be effectively mitigated. All other build alternatives considered in the SDEIS would either have unacceptable impacts to 4(f) resources or would not meet Purpose and Need. Through the 404 Merger Agreement Signatory Agency Committee (SAC) process the EPA was provided an added opportunity to address their concerns with the Draft Supplemental EIS (DSEIS). The SAC process resulted in approval of Concurrence Point 3 from the EPA and other signatory agencies, indicating approval of the Modified Alternative 5 as the preferred alternative with the proposed mitigation. The EPA also will have an additional opportunity to review analysis presented in this FEIS. Comments on specific issues from the DSEIS are provided below.

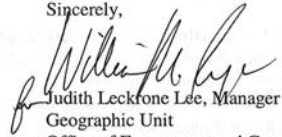


EPA conducted a partial review of a preliminary DSEIS (pre-DSEIS) issued in March 2004, and provided comment to Federal Highway Administration (FHWA) in a letter dated May 7, 2004. We thank you for your response to those comments, dated May 25, 2004. Where appropriate we re-state and augment the comments that were provided in the pre-DSEIS review. We also provide additional comments on topics not included in our review of the pre-DSEIS.

Based upon our review, we are rating the DSEIS as EC-2 (Environmental Concerns, Insufficient Information). A description of this rating is enclosed. Our rating is based primarily upon (1) the need for analysis and disclosure of induced travel resulting from the transportation improvement and its associated effects on land use and growth; (2) the need for analysis and disclosure of air toxics pollution resulting from the proposed project, identification of sensitive receptors, and inclusion of construction mitigation measures; (3) the need for analysis and disclosure of the project's secondary and cumulative effects upon water quality, water quantity, aquatic habitat, flooding, and fish; and (4) our continued concern that additional public transit service and facilities, access management, and aggressive and innovative Transportation Demand Management (TDM) strategies need to become integral components of the proposed project in order to offer an additional solution to traffic congestion in Issaquah.

Our detailed comments are enclosed. If you have questions or would like to discuss these comments, please contact Elaine Somers of my staff at (206) 553-2966. Thank you for the opportunity to provide comment.

Sincerely,

  
Judith Leckrone Lee, Manager  
Geographic Unit  
Office of Ecosystems and Communities

Enclosures

cc: Dave Scott, WSDOT Northwest Region  
Pam Fox, City of Issaquah

U.S. Environmental Protection Agency  
Southeast Issaquah Bypass Draft Supplemental EIS  
Detailed Comments

**Induced travel, induced growth, and impact projections.** We have reviewed the traffic modeling results and we are unclear whether the analysis includes an assessment of induced travel demand that is likely to result from the proposed bypass. The traffic model uses population and employment forecasts to derive transportation demand in years 2005 and 2030. It is unclear, however, whether these population and employment forecasts have taken into account induced growth expected from the proposed bypass. The EIS should include a realistic projection of how the proposed bypass will likely change amounts and locations of residential and commercial growth.

While it is unclear whether the traffic model accounts for land use changes or fully incorporates induced travel demand and induced growth, the DSEIS includes information that highlights the potential for these effects. The City of Issaquah is currently studying the relationship between new roadways and growth (p. 4-270), and in the DSEIS (pages 4-267 through 4-270), there are several indications that transportation investments have the potential to influence land use and human activities. For example, there is acknowledgment that the proposed bypass "...could have an indirect effect on the rate and timing of when expected growth may occur," and that the additive convenience afforded by the bypass' connection with the South SPAR/Sunset Interchange and North SPAR projects "...may make the eastern portions of the Olde Town and Sycamore subareas, and adjacent county land, more attractive for potential residents." Also, "Construction of the Southeast Issaquah Bypass may have the potential to increase zoning density changes, as well as requests for local property rezones," and the bypass "...could help facilitate development of the Sammamish Plateau." The most substantive evidence is given in discussions regarding the project area history (p. 4-195, 4-196) and the effect that the transportation infrastructure in the form of railroads and roads has had on development of the project area. An additional factor that could allow and potentially induce development is the absence of access management on the proposed bypass (p. 4-146, 4-147), which, as the DSEIS indicates, causes the proposed bypass to be non-compliant with the Vision 2020 Multi-County Policy RT-8.7.

If these induced travel effects have not been taken into account in the modeling, EPA recommends that FHWA, WSDOT, and the project sponsor perform traffic modeling that specifically, (a) adjusts trip destination/distribution to reflect project effects on travel times and speeds (the speeds used for assignment should be consistent with those used for trip distribution or there is internal inconsistency and a contradiction in the analysis); and (b) adjusts land use assumptions between the Build and No Build cases to reflect how changes in travel times and speeds would affect the type and location of growth. To the extent that the modeling does not include this information, the EIS should disclose how the lack of that information affects the impacts analysis.

2

2. The DSEIS states that direct impacts on population growth are not expected to result from the new roadway. In the City's CP3 document, the FHWA determined "the project will mostly serve existing travel patterns and is unlikely to have any regional impacts and will, thus, result in minimal induced demand due to changes in trip activity and land use relocations."

Since issuance of the SDEIS, FHWA and EPA have coordinated on this issue during the City's negotiations with resource agencies for the 404 Merger Process concurrence on the preferred alternative. FHWA concluded that appropriate modeling approaches for the proposed project have been followed and, therefore, further study of sub-regional or regional land use effects would not be necessary. A copy of the FHWA and EPA correspondence on this issue, and concurrence from EPA and other resource agencies, is provided in the Concurrence Point 3 Package available from the City of Issaquah, or via the City's website at [www.ci.issaquah.wa.us](http://www.ci.issaquah.wa.us).



**Air Quality – Air Toxics.** The DSEIS states (p. 4-5) that “Long-term effects on air quality in the project area would primarily result from vehicle emissions” and that the bypass is expected to attract increased truck traffic. While the EIS has indicated that there would not be substantial adverse impacts to air quality from carbon monoxide (CO), the DSEIS does not account for area-wide and near-roadway new and increased exposure effects to populations for other air pollutants, including air toxics and diesel particulate matter.

There is heightened concern for human health from projects that result in air toxics emissions and particulate matter from mobile sources, particularly diesel exhaust. The National Air Toxics Assessment, <http://www.epa.gov/ttn/atw/nata>, asserts that a large number of human epidemiology studies show increased lung cancer associated with diesel exhaust and significant potential for non-cancer health effects. Also the Control of Emissions of Hazardous Air Pollutants From Mobile Sources Final Rule (66 FR 17230, March 29, 2001) lists 21 compounds emitted from motor vehicles that are known or suspect to cause cancer or other serious health effects.

EPA strongly recommends that the EIS disclose whether vehicular air toxics emissions would result from project construction and operations, discuss the cancer and non-cancer health effects associated with air toxics and diesel particulate matter, and identify sensitive receptor populations and individuals that are likely to be exposed to these emissions. For example, the school children in the three schools (Issaquah High School, Clark Elementary, and Tiger Mountain High School) that are in close proximity to the proposed roadway, the Issaquah High School outdoor athletic field facilities that are immediately adjacent to the proposed road way, and the elderly and low income residents, which the census data indicate live in the project impact area, are considered sensitive receptors.

For each alternative, EPA recommends:

- Disclosure of all locations at which emissions would increase near sensitive receptors because of project construction, intersections, increased traffic, including increased diesel traffic, increased loads on engines (higher speeds, climbs, etc.)
- An assessment or accounting (qualitative or modeled depending on the severity of existing and projected conditions) of all the factors that could influence the degree of adverse impact on the population because of the activities listed above (e.g., distances to human activity centers and sensitive receptor locations, particularly parks, schools, hospitals, etc; amount, duration, and location of emissions from construction, diesel and other vehicles, etc.)
- For receptor locations, we recommend that hotspot analysis be conducted for air toxics and particulate matter, and that construction mitigation measures be included. We have enclosed two lists of potential mitigation measures that could reduce emissions during construction.

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3. On February 3, 2006 FHWA released interim Guidance on Mobile Source Air Toxic (MSATs) analysis in NEPA documents. This guidance is interim because MSATs science is still evolving. Currently, EPA has not established regulatory concentration targets for relevant MSAT pollutants appropriate for use in the project development process. Therefore, qualitative MSAT analysis has been added for the Modified Alternative 5.

**Water quality, water quantity, aquatic habitat, flooding, and fish – existing conditions and secondary and cumulative effects.** We commend the project proponents for including more information on the condition of the affected environment in the project area. In particular, there is more information with respect to water quality in the Issaquah Creek Basin and Lake Sammamish, lack of stream flows, flooding, ground water recharge functions, and brief discussion of the Issaquah Creek Nonpoint Action Plan and the Issaquah Creek Valley Groundwater Management Plan.

While the document does a good job of analyzing and disclosing direct impacts to aquatic resources from the proposal, we continue to recommend that the EIS include a quantitative analysis of the secondary and cumulative effects of this proposed project on water quality and aquatic resources, as discussed in our September 28, 2000 letter on the Draft EIS. There are a variety of models available for quantifying the projected cumulative effects on environmental resources. Examples include *Nonpoint Education for Municipal Officials (NEMO)*, a model that predicts impervious surface cover based on land use projections, *Community Viz*, an alternative futures planning model with outputs for environmental parameters, and the *Smart Growth Index*, a planning futures sketch tool that also provides environmental outputs.

The outputs of a revised traffic modeling effort, as discussed above, which incorporates induced travel demand and land use effects, would be useful in developing a secondary and cumulative impacts assessment because it would provide projections for land use changes as well as traffic volumes, project area roadway use, extent of impervious surface, runoff, and pollutant levels.

**Fish.** The presence of kokanee in the Issaquah Creek system is documented in the DSEIS (p. 4-120). We recommend, however, that the EIS include a description of the status and threats to and condition of the affected environment for kokanee. Lake Sammamish and its tributaries support one of the last native wild kokanee salmon runs in the State of Washington. This run had two major components – the early and late run. The status and vulnerability of these kokanee are documented in recent scientific literature (Berge and Higgins, 2003). The early run was recently pronounced extinct. The late run had a recent resurgence, but is still on a long-term decline. Kokanee are highly susceptible to hydrologic changes, sedimentation, and pollution in the streams, and are dependent on Lake Sammamish for their rearing to adulthood.

While stormwater management and erosion control measures will be implemented for the proposed project, the DSEIS (p. 4-266) indicates that “The combined impacts of the Southeast Issaquah Bypass and additional projects in the area could contribute cumulatively to an increase in impervious surfaces, a loss of groundwater recharge areas, and general disturbance that could introduce sediments into the Issaquah Creek Drainage. Stormwater and erosion controls and mitigation can minimize these impacts, but taken cumulatively, further degradation of water quality in the Issaquah basin may result.”

Based on recent events, there is a possibility that steep, unstable slopes in the project area, ground disturbance and disruption of subsurface hydrology, and the cumulative effects of development activities could result in additional significant sedimentation to streams and aquatic

4

4. Comments noted. A revised traffic analysis for induced travel demand is beyond the scope of this FEIS as indicated in correspondence between EPA and FHWA during the 404 Merger Agreement discussion on Concurrence Point 3 (see City's Concurrence Point 3 Packet [December, 2005]). Thus the FEIS continues to provide a qualitative assessment of potential secondary and cumulative impacts.

5

5. The potential presence of kokanee in the project area is addressed in the fisheries and threatened and endangered species sections in Chapter 4 of this FEIS. The Kokanee salmon (*Onchorynchus nerka*) is not federally or state listed in the Issaquah Creek basin, nor is the species classified as a candidate species of concern. The late-run population is, however, declining as shown by recent studies (Berge and Higgins, 2003) and early-run kokanee have been declared functionally extinct. A revised Biological Assessment has been prepared for issuance with the FEIS. In addition, cities around Lake Sammamish are working with King County and Washington State Department of Fish and Wildlife on the Kokanee issue, and will be evaluating various conservation and recovery measures in a proposed 2008 work program.

6

habitats. In January 2004, a second major landslide occurred on a hillside near the new Sunset Interchange. EPA believes that these events underscore the need for the EIS to further analyze and disclose project area hydrology and discuss the ecological, human health and safety uncertainties associated with project related development and the further development of this watershed.

**Threatened and endangered species.** Thank you for including the Biological Assessment (BA) document with the publication of the DSEIS. In line with our earlier comments about induced travel, we believe that the BA should factor in the results of an updated traffic projection modeling effort to account for the effects of new transportation infrastructure on travel demand and land use. These effects could potentially result in additional secondary and cumulative effects upon threatened, endangered, and candidate species.

**Spill containment.** On page 4-73, the DSEIS indicates that ponds in the southern portion of the project "could be equipped with emergency shut-off valves..." We recommend that this be done.

**Wildlife crossings.** We commend the project proponents for including wildlife crossings in the proposed project. Clarification and additional information is needed regarding the crossings in the three separate sections of the project:

**I-90/East Sunset Way Interchange section:** It is not clear whether the "overpasses" and the north/south corridor below the freeway for wildlife were designed and constructed specifically for wildlife (p. 4-105). On page 4-106, the three wildlife crossings are all described as being underneath I-90. If heavy traffic, which the DSEIS states will be exacerbated by the proposed bypass, is responsible for low usage by wildlife, improved siting and/or design may be necessary to achieve effective connectivity. Please describe the improvements that the DSEIS indicates would be made that are in addition to directive fencing.

**North Project Area section:** We are pleased that an underground wildlife crossing will be provided in the vicinity of Southeast Evans Lane and that Alternatives 3 and 4 include a wildlife crossing south of the Issaquah School District athletic field. It is not clear why this second crossing south of the athletic field is not included in all of the alternatives. We recommend that the crossing south of the athletic field be included in all alternatives, but most importantly in the selected alternative. In addition, the Washington Department of Fish and Wildlife should be consulted regarding whether or not it is advisable to post signs for the wildlife crossings that alert pedestrians to the occurrence of wildlife crossings so they avoid the area. Signs may have the opposite effect in some cases.

**South Project Area section:** The wildlife crossing for Alternatives 3 and 4 and the bridge for Alternatives using the South A alignment would have 6 feet of clearance in height, which the DSEIS indicates may not be adequate to avoid deterring use by large-sized mammals. We recommend that increased height be considered to improve the crossing designs. It is also important that the bridge be wide enough to span upland areas as well as wetted areas to enable movement for terrestrial wildlife species. Currently there is no safe passage for wildlife to access

6

6. Supplemental analysis of existing hydrologic conditions and potential permanent stormwater impacts was conducted by the City for the Concurrence Point 3 package, and associated mitigation measures have been expanded upon. This information is reflected in the text of the FEIS. This analysis has resulted in a greater level of surface water hydrology and water quality protection, to an extent that should effectively prevent adverse effects on streams in the project area. There remains a possibility that a minor reduction in ground water recharge would occur as a result of the project. Project design will include a commitment to maximizing infiltration of stormwater to prevent and minimize reduction of recharge. As for construction-phase impacts on receiving waters, the project will be subjected to rigorous erosion and sediment control requirements to minimize adverse impacts.

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The January 2004 landslide event is not necessarily an indication of problems that would be likely to occur at the Southeast Bypass construction site. That event was caused by excessive groundwater seeping which originated at a very large upland stormwater infiltration facility that serves the much larger Issaquah Highlands development. Subsurface soil and groundwater conditions change significantly over relatively short vertical and horizontal distances in the project vicinity and thus it would not be appropriate to assume that conditions in the SE Bypass project area are the same as those encountered at the Sunset Interchange, or Issaquah Highlands. All large construction projects in the vicinity should be subjected to site-specific review to meet requirements to minimize adverse effects on Issaquah Creek and its tributary streams.

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7. New traffic modeling has not been required per correspondence between EPA and FHWA during the 404 Merger Agreement discussions on Concurrence Point 3 held after the SDEIS was released. A revised Biological Assessment is included with this Final EIS and discusses indirect effects of increased traffic flow. The City's Concurrence Point 3 Packet also addressed these concerns in Attachment B and Attachment H.

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8. Comment noted. The discussion of mitigation measures for accidental spills has been expanded considerably in the FEIS.

9. *I-90/Sunset Way Interchange* - In the Concurrence Point 3 Package (the agreement between the proponents and the resource agencies on the preferred alternative and compensatory mitigation) the City has also agreed to facilitate a discussion during the project design stage with WSDOT through an inter-agency request to evaluate maintenance needs at the existing wildlife crossings on I-90 in coordination with WDFW and USFWS.

the Issaquah Creek corridor. We recommend providing passage across Issaquah-Hobart Road be examined.

**Wetlands.** It appears that wetland impacts from Alternatives 2, 4, and 6 have been reduced substantially from the June 2000 Draft EIS. EPA appreciates the work that went into exploring other design options and realignment to reduce wetland impacts, particularly for the preferred alternative (Alternative 6).

The following comments focus on the conceptual mitigation proposed for unavoidable impacts to wetlands. As the mitigation is further refined, EPA would like an opportunity to comment on the draft mitigation plan. In particular, EPA is interested in the planting plan.

In addition, EPA is concerned about activities conducted during any construction. Throughout the plan, it is mentioned that before construction, limits of clearing would be marked. There have been past issues with Washington Department of Transportation (WDOT) sites and violations occurring as a result of misunderstandings as to what is marked and why. EPA encourages WDOT to have a trained staff person at the site during initial land clearing to identify the boundary to the machinery operators.

**Mitigation.** On page 4-84, second to last paragraph, the DSEIS states that Site 1 mitigation would involve removing the "fill" material. Removal of fill material is mentioned several times throughout the mitigation discussion. Please note that removing fill material from a site that was previously documented as a wetland is considered restoration mitigation, not creation. While the success rate is higher for restoration, the ratios of replacement are slightly lower. Further clarification on whether this is considered to be a wetland restoration or a wetland creation should be provided in the EIS.

On page 4-87, first paragraph, is stated that Site 2 "could be used for wetland creation by removing fill material previously placed in the Wetland GW." On page 4-93, second paragraph, our above comment also applies here. Please clarify whether these would be considered a wetland restoration or a wetland creation, and provide the justification for this.

**Invasive species.** The potential for introducing invasive plant species is mentioned on page 4-104 of the DSEIS. Also, on page 4-83, last paragraph, the DSEIS mentions that "periodic maintenance such as pruning vegetation adjacent to the bridge could disturb areas and possibly allow invasive species to colonize the margins of the bridge." In compliance with NEPA and in accordance with the Executive Order 13112 (E.O. 13112) on Invasive Species, analysis and disclosure of ground disturbing activities that create opportunity for establishment of non-native invasive species, as well as mitigation to prevent or control such outbreaks should be included in the NEPA document. This means that every effort should be made to eliminate any invasive species that colonize along the margins of the bridge or in other areas disturbed by this proposed project. EPA recommends that an invasive species management program be developed and implemented that includes invasive species removal and supplemental planting of natives that tolerate the new conditions (dry shade) that a bridge would create. We are pleased that the DSEIS indicates that proposed roadway vicinity and mitigation sites will be revegetated using

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North Project Area. Modified Alternative 5, the preferred alternative, does not include a wildlife crossing in this portion of the corridor because existing fencing on private lands in this area would conflict with the goals of the crossing. This decision was agreed upon by the resource agencies, including the Washington Department of Fish and Wildlife.

South Project Area. During the development of the Concurrence Point 3 Package with the regulatory agencies it was agreed that elevating the bridge to 8 feet was not necessary because it could not be demonstrated that this would benefit the migration of large mammals. Regarding a crossing further south of the corridor, the City recognizes that more needs to be understood regarding the migration patterns of large mammals between Tiger and Squak Mountains. Therefore, in the Concurrence Point 3 Package, they agreed to participate monetarily to help initiate a study and planning effort to address regional wildlife connectivity.

10. Further analysis during the development of the CP3 Package determined that Modified Alternative 5 is the preferred alternative for the project. The alignment of South A has been modified from that shown in the SDEIS, in order to avoid filling of Wetland GW. EPA was given the opportunity to comment on the draft conceptual mitigation plan. Details on planning plans won't be available until final design is conducted.

11. The limits of clearing will be clearly marked in the field, both at the restoration site and at the impact areas. A pre-construction meeting will be held before clearing and grading begins, during which the contractor will be informed about the limits of clearing. A trained staff person will be on the site during initial clearing to clarify any issues regarding the clearing limits.

12. The mitigation plan for the wetland fill and wetland shading proposes wetland re-establishment at a 3-to-1 ratio, as recommended by the Department of Ecology (Ecology). Existing, degraded wetland areas will also be enhanced, and a 110-foot buffer will protect the wetlands. According to the "Guidance on Wetland Mitigation in Washington State," by DOE, Corps, and EPA, wetland re-establishment and wetland creation receive the same amount of credit.



native species and recommend including a native grass and forb mixture to ensure adequate coverage to prevent establishment of invasive plants. We encourage the use of wholly or primarily non-chemical means to prevent and/or control establishment of invasives in areas disturbed by project activities.

**Tribal consultation, natural and cultural resources.** The DSEIS describes on page 4-193 efforts to contact the affected tribes (Tulalip, Snoqualmie, and Muckleshoot). Tulalip Tribes sent a letter to WSDOT in May 2003 that included a list of standard operating procedures they wished to see followed during project development. Their letter points to the importance of the need for (1) conducting ethnobotanical surveys and replanting of indigenous plants in areas disturbed by the project; (2) preventing adverse effects to trees, flora, and fauna adjacent to rivers and streams; and (3) protecting their water resources and fisheries. The Muckleshoot Tribe commented on the Draft EIS issued in 2000 expressing detailed concerns about the aquatic resources and fisheries. A Snoqualmie Tribal member indicated concern for Indian burial sites on Grand Ridge in the vicinity of Black Nugget Road. The DSEIS is not clear as to how these issues have been addressed in the project planning and EIS development process. The EIS should clearly describe how the concerns of the tribes have been addressed and reflected in the project alternatives and design.

Under NEPA, the scope of cultural resource analysis should include direct and indirect impacts to traditional resource rights, historic buildings, historic districts, archeological sites, Native American traditional places, sacred sites, environmental justice issues, and traditional ways of life. As we stated in our comments on the pre-DSEIS, the following is a list of specifics that we believe should be addressed in the EIS for a complete analysis of cultural resources:

- sacred sites (see Executive Order 13007);
- traditional cultural properties or landscapes;
- hunting, fishing, gathering areas (including impacts to ecosystems that support animals and plants that are or once were part of the tribes' traditional resource areas);
- access to traditional and current hunting, fishing, and gathering areas and species (berries, root foods, basket weaving materials, fire wood, elk, deer, trout, and any other species of concern to the tribes);
- changes in hydrology or ecological composition of springs, seeps, wetlands, and streams, that could be considered sacred or have traditional resource use associations;
- travel routes that were historically used, and travel routes that may be currently used;
- historic properties, districts, or landscapes;
- cultural uses of the natural environment, the built environment, and human social institutions;
- unique characteristics of the geographic area such as proximity to historic or cultural resources (40 CFR 1508.27(b)(3)); and
- 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 (40 CFR 1508.27(b)(8) in accordance with the National Historic Preservation Act (NHPA).

Consultation with the affected tribes, per Section 106 of the National Historic Preservation Act (NHPA), has been initiated, and FHWA has committed to ensure that appropriate consultation and resolution occurs (FHWA response letter to EPA on pre-DSEIS, 5/25/04). In their letter, FHWA also indicates that "Once a preferred alternative is selected, the specific impacts to cultural and

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13. The temporarily impacted wetland and buffer areas will be restored with native plants suitable to the area, per the mitigation plan. Performance standards included in the plan will require the invasive species coverage to be less than a certain percentage each year. The monitoring program for the project will cover at least a 10-year period; by the end of this period, native vegetation should be well-established enough to prevent invasives from colonizing.

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14. Mitigation measures in this Final EIS include measures to protect vegetation, fish and wildlife, aquatic resources and water quality under the evaluation of natural elements in Chapter 3. After issuance of the SDEIS, additional mitigation was identified during the Concurrence Point 3 process under the 404 Merger Agreement. Concurrence was obtained from resource agencies participating in 404 Merger Process review that Modified Alternative 5 would represent the least environmentally damaging practicable alternative for the proposed project.

Mitigation for potential impacts on cultural resources is provided in this Final EIS and in the Cultural Resources technical report for this project. The proposed project's northern limits would end south of Interstate 90 and would not affect property on Grand Ridge or other areas north of the interstate. The Office of Archaeology and Historic Preservation was contacted during the 404 Merger Process regarding Modified Alternative 5 and has concluded that the proposed project would have no adverse effects on cultural resources. Therefore, a Memorandum of Agreement will not be needed and no further consultation under Section 106 is needed. If archaeological resources are encountered during construction, work would be stopped and the OAHF would be consulted regarding these resources.

historic resources will be confirmed and coordination with OAHP, the Tribes, and the Advisory Council on Historic Preservation (ACHP), as appropriate, will occur, per the requirements of the NHPA.” We are concerned with this approach as it appears to be inconsistent with the direction of the NEPA regulations. In order to demonstrate that all practicable means have been taken to avoid or minimize possible adverse effects (see 40 CFR 1500.2(f)) the specific impacts to cultural and historic resources need to be examined for each alternative.

Consultation to resolve adverse effects should be coordinated with public comment on the DSEIS, with the results reported in the Final EIS. Any Memorandum of Agreement (MOA) developed under Section 106, or the final comments of the ACHP, should be addressed in the Record of Decision (ROD). The Section 106 MOA should be fully executed before the ROD is issued, and the ROD should provide for implementation of the MOA’s terms.

**Community Impacts.** In compliance with NEPA, actions should be taken to conduct adequate public outreach and participation that ensures the public fully understand the possible impacts to their communities and trust resources. Communities must be effectively informed, heard, and responded to regarding the project impacts and issues affecting their communities and natural and cultural resources. Outreach methods should accommodate physical disabilities and potential differences in language and education levels. The information gathered from the public participation process and how this information is factored into decision-making should be disclosed in the EIS.

The public involvement activities are documented in Chapter 6 of the DSEIS, and the comment letters from the public are included in a separate volume. However, we recommend that the chief concerns of the public, particularly the neighborhood and project area residents that are most affected by the project, be disclosed and responded to in Chapter 6 of the EIS.

The DSEIS indicates there would be between 5 and 10 single-family residences (including two potential low-income households) displaced by the proposed bypass. The residents of this neighborhood may also be affected by air pollution, noise, visual aesthetic impacts, light and glare, construction activities, change in neighborhood character, setting, or cohesion, and other potential social disruptions and economic impacts, e.g., change in property values, health effects, etc. The NEPA document should clearly disclose what was heard from the neighborhood residents and how what was heard has been incorporated into decision-making for the project.

**Public Transit and Transportation Demand Management.** We are pleased to note that the City of Issaquah recently completed a study that recommended a new transit center be located near the existing Issaquah Park-and-Ride location and that the City and Sound Transit are currently moving forward with preliminary design of the recommended site (p. 2-25). We recommend that more information about this new Park-and-Ride facility be included in the EIS, such as how many vehicles it will accommodate, and any new or improved transit service that will be provided. To improve the long-term viability of the proposed project as a congestion management solution, we urge that this and other efforts to improve public transportation and to pursue Transportation Demand Management (TDM) strategies be included as integral components of this project.

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15. Impacts and mitigation measures for local neighborhoods are identified in the evaluation of social elements in Chapter 3 of this Final EIS. Modified Alternative 5 was chosen as the preferred alternative for the proposed project. A summary of issues expressed by local neighborhood residents who commented on the SDEIS has been included in Chapter 5 of this Final EIS, and responses to individual comment letters are provided below.

16. Since issuance of the SDEIS the Issaquah Highlands Park and Ride was completed and opened in February 2006. The new facility provides 1,000 parking stalls on a four-acre site within the Issaquah Highlands town center. The project was a cooperative effort by King County Metro and Sound Transit. The Issaquah Transit Center on SR-900 is also under construction, providing more than 800 parking stalls. Bus routes served by these facilities are described in Chapter 3. The proposed SE Issaquah Bypass would provide access to the Issaquah Highlands Park-and-Ride for vehicles traveling from points of origin south of Interstate 90, and would probably be more convenient than the Issaquah Park-and-Ride on SR-900. Transportation Demand Management (TDM) is added to alternatives that were considered in the EIS but rejected in Chapter 2.

**Comment Letters on June 2000 Draft EIS.** We note that the EPA comment letter on the Draft EIS, which is printed in the Comment Letters volume of the DSEIS (pages 7-13), is difficult to read. For the purposes of disclosure under NEPA, we would be happy to supply a readable copy for inclusion in the final EIS.

#### Mitigation Measures to Reduce Emissions During Construction

- Properly maintain construction equipment;
- Evaluate the use of available alternative engines and diesel fuels:
  - engines using fuel cell technology
  - electric engines
  - engines using liquified or compressed natural gas
  - diesel engines that meet the proposed EPA 2007 regulation of 0.01 g/bhp-hr (grams per brake horsepower hour)
  - diesel engines outfitted with catalyzed diesel particulate filters and fueled with low sulfur (less than 15 ppm sulfur) fuel
  - diesel engines fueled with biodiesel (diesel generated from plants rather than petroleum)
  - fueling on-site equipment, e.g., mining equipment, with lower sulfur highway diesel instead of off-road diesel fuel;
- Reduce construction-related traffic trips and unnecessary idling of equipment;
- Use newer, "cleaner" construction equipment;
- Install control equipment on diesel construction equipment (particulate filters/traps (DPTs), oxidizing soot filter, oxidation catalysts, and other appropriate control devices to the greatest extent that is technically feasible.) A particulate filter ("P-trap" or oxidizing soot filter) may control approximately 80% of diesel PM emissions. An oxidation catalyst reduces PM emissions by only 20%, but can reduce CO emissions by 40%, and hydrocarbon emissions by 50%. Different control devices may be used simultaneously.
- Reroute the diesel truck traffic away from communities and schools.
- Adopt a "Construction Emissions Mitigation Plan (CEMP). A CEMP would help to ensure that the procedures for implementing all proposed mitigation measures are sufficiently defined to ensure a reduction in the environmental impact from diesel PM and NOx due to the project's construction. CEMP inclusions:

All construction-related engines are tuned to the engine manufacturer's specifications in accordance with the time frame recommended the engine manufacturer; not idle for more than 5 minutes; not tampered with in order to increase engine horsepower; include particulate traps, oxidation catalysts and other suitable control devices on all construction equipment used at the construction site; and use diesel fuel having a sulfur content of 15 ppm or less, or other suitable alternative diesel fuel. Minimize construction-related traffic trips through appropriate policies and implementation measures.

Implement an adaptive mitigation measure program over the project's construction phase.

### Construction Mitigation Measures Adopted for Several Major Projects in California

#### A. Administrative

1. Have a Mitigation Plan that is committed to in the ROD and included in the FEIS.
2. Require reporting.
  - a. Prepare inventory of all equipment prior to construction.
  - b. Report on suitability of add-on controls for each piece of equipment before groundbreaking.\*\*
  - c. Evaluate other engine alternatives: electric, CNG, LNG, fuel cell, alternative diesel.
  - d. Monthly, public reports by Environmental Coordinator of fulfillment of requirements
3. Suitability report subject to review by Air District, USDOT, State DOT, EPA and the public

#### B. Equipment

1. Use add-on controls such as catalysts and particulate traps where suitable.
2. Use fuel with 15 ppm of sulfur or less unless unavailable.
3. Establish idling limit (e.g., 5-10 minutes per hour).
4. Tune to manufacturers' specs and do so at manufacturers' recommended frequency.
5. Prohibit any tampering with engines and require continuing adherence to manufacturers' recommendations.
6. Require that leased equipment be 1996 model or newer unless cost exceeds 110% of average lease cost.
7. Require 75% of total horsepower of owned equipment to be used to be 1996 or newer models.

#### C. Work limitations

1. Establish a cap on daily emissions and/or hours of work.
2. Use no more than 2 pieces of equipment simultaneously near or upwind from sensitive receptors.
3. Establish additional emissions limits within 1000 feet of any K-12 school.
4. Provide notification to all schools within 1000 feet.
5. Reduce truck trips and/or restrict hours of driving through communities to minimize risk.

\*\* Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public. Such determination is to be made by the Contract Project manager (CPM) in consultation with the appropriate vendor.

U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\*

Environmental Impact of the Action

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
SEATTLE DISTRICT, CORPS OF ENGINEERS  
P.O. BOX 3755  
SEATTLE, WASHINGTON 98124-3755

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Regulatory Branch

City of Issaquah  
Bob Brock, Public Works Director  
Issaquah Public Works Department  
Post Office Box 1307  
Issaquah, Washington 98027

Dear Mr. Brock:

SUBJECT: Southeast Issaquah Bypass, Draft Supplemental EIS (DSEIS)

The U.S. Army Corps of Engineers (Corps) has reviewed the referenced document with particular emphasis on the wetland and aquatic impacts of the project. As the project develops, the Corps will likely have additional comments.

The need for this project is stated as 1) increase mobility in downtown Issaquah by reducing congestion, and 2) improve access from the south to I-90. The purposes for the project all revolve around mobility, access, level of service, linking with the regional road system, and promoting multimodal transportation options. The Corps has no comments on the purpose or need.

All the stated alternatives include a new four lane highway between Front Street South, with two travel lanes in each direction, and including bicycle lanes, sidewalks and trail connections. The south section of the new highway includes three alternatives, none of which will have direct impacts on any existing aquatic resources. The possibility exists for some impacts to upland ditches that connect to other waters of the U.S. These ditches appear to be jurisdictional, and would be under Corps regulation. As the project is further refined, the Corps will review impacts based on its jurisdiction. See comment 12 for additional information.

The north section of the new highway includes two alternatives, both of which will impact aquatic resources. These northern alternatives are of interest to the Corps with regard to permitting. The majority of the present comments are related to the north section alternatives.

1. Several of the alternatives do not actually cross North Fork Issaquah Creek, however the only separation between the highway and creek appears to be a retainer wall.

a. What direct and indirect impacts would result from actually crossing the creek?

b. What direct and indirect impacts would result from the construction of a retainer wall?  
How far would the wall be located from the riparian zone?

1. The project would not involve constructed features in close proximity to North Fork Issaquah Creek. If this comment was intended for East Fork Issaquah Creek, the following response is provided: A large retaining wall would be needed along the east edge of the SE Bypass roadway at the north end of the project corridor. This wall would not extend into the existing riparian corridor of East Fork Issaquah Creek. The project would not involve construction of any roadway or bridge crossing over the creek in this area. The only potential effects of construction on the creek in this area would be due to potential erosion and sedimentation effects during construction and interception of shallow ground water in the retaining wall's drainage system over the long-term following construction. These impacts are addressed in the Hydrologic Systems and Water Quality sections in Chapter 3 of the FEIS.

2. Several of the alternatives include six stormwater ponds and others five. What impacts would result from the construction of six stormwater ponds instead of five ponds, as discussed in the DSEIS? Would there be more or less likelihood of overflow into wetlands or streams with one alternative or the other? Would the location of the ponds also affect the likelihood of overflow? Would the impact to other aquatic resources be increased or diminished by either alternative?

3. Ponds A-1 and A-2 are both close to Lewis Lane Tributary. Do they drain to it? What impacts might they have on the creek or to any wetlands?

4. North pond 1 is close to the East Fork Issaquah Creek. Is there a direct connection? What impacts would this pond have on the creek or any associated wetlands?

5. Does Pond C-1 have a connection to or drain to Wetland GW?

6. The document mentions that a "large storm event" will cause two stormwater ponds to overflow into Wetland HS. How frequently would this occur? What would be the anticipated effects?

7. What consideration has been given to providing a more unrestricted flow between Wetlands GW and HS, by means of a bridge rather than only a culvert?

8. Is there a surface hydrological connection between Wetlands HS and GW at present? Or historically? What consideration has been given to re-establishing continuity between the wetlands GW and RD or between GW and VL?

9. Is there a surface hydrological connection between Wetlands RD and GW, or between Wetlands VL and GW? Will such a connection be maintained or disturbed by any of the proposed work?

10. The document mentions a replacement culvert draining wetland HS under the abandoned railroad bed. Where does this culvert lead? What is its present/future purpose?

11. The figures provided seem to indicate that all of the wetlands in the project area may have been historically connected. Subsurface flow may still connect them. What consideration has been given to re-establishing wetland connectivity?

12. Under the Talent Decision, the Corps takes jurisdiction over certain upland ditches that flow into other waters of the U.S. Under any of the alternatives, there would be impacts to existing roadways, some of which may have jurisdictional ditches. As the alternatives are narrowed, the City of Issaquah is advised to note impacts to such ditches in determining the least environmentally damaging preferred alternative.

2. The FEIS discusses specific plans for stormwater ponds for all alternatives, as the other build alternatives considered in the DSEIS are no longer proposed. The impacts of these ponds on nearby streams and wetlands are described in the text of the FEIS in the Hydrologic Systems and Water Quality sections of chapter 3, and are briefly addressed in the responses to comments 3 through 6 below.

3. South Ponds S-1, S-2, and S-3 would be located close to the Lewis Lane Tributary (north tributary to Issaquah Creek) under Modified Alternative 5. Each of these ponds would drain to this stream. The ponds would not deprive Wetland GW or the stream of existing hydrologic input, but would result in minor alterations in existing streamflow patterns that are described in detail in Attachment C (Revised Stormwater Analysis) to the Concurrence Point 3 Packet and in the FEIS.

4. North Pond N-1 would be close to East Fork Issaquah Creek under Modified Alternative 5. This pond would discharge to the East Fork, and would require construction of a new outfall to the creek. This pond would not affect wetlands, as there are no wetlands in that area. Sufficient stormwater treatment would be incorporated in this pond such that adverse effects on East Fork Issaquah Creek water quality would not occur. Minor effects on streamflow patterns in the East Fork, which Pond N-1 would factor into, are discussed in detailed in Attachment C (Revised Stormwater Analysis) to the Concurrence Point 3 Packet and in the FEIS.

5. This comment is related to what is now called South Pond S-1 for Modified Alternative 5 (the preferred alternative discussed in the FEIS). The pond would have an outfall that directs flows via a spreader into the north tributary to Issaquah Creek (Lewis Lane Tributary) that lies within Wetland GW in that area.

6. Modified Alternative 5 would involve stormwater discharges into Wetland HS only when North Pond N-2 is overflowing due to a large storm event hydrograph exceeding the infiltration and storage capacity of this pond. As discussed in Attachment C (Revised Stormwater Analysis) to the Concurrence Point 3 Packet and in the Hydrologic Systems section of Chapter 4 of the FEIS, this pond should be able to infiltrate approximately 95% of the annual runoff volume routed to it. For reference, 95% of the average annual runoff volume typically occurs in storms with recurrence frequency of about 6 to 8 months in the Issaquah area. The peak portion of the runoff hydrograph from a few large rainfall events each year would represent the overflow runoff volume entering Wetland HS. Thus, it is expected that the pond would overflow into Wetland HS (indirectly via a long channel between the pond and the wetland) occasionally, and only for short periods of time. The storm events in which the pond overflows would occur would likely coincide with high water conditions in Wetland HS, and thus it is not expected that adverse alteration of the wetland's hydroperiod would result.

7. The conceptual mitigation plan for the project focuses on two options that provide significant opportunity for re-establishment and enhancement of wetlands and buffers. Mitigation for the project was not considered at Wetland HS, as mitigation opportunities are relatively few. Wetlands HS and GW were most likely one wetland historically, before the railroad was built. Currently, no stream exists between Wetlands HS and GW, or within Wetland HS. The culvert connecting Wetlands HS and GW, which is over 100 feet long and lies beneath a high railroad bed (abandoned), provides the only surface connection between the two wetlands. Wetlands GW and RD are currently connected by a culvert located just east of the intersection of SE 96th Street and 238th Way SE. Wetlands GW and VL are also currently connected by a culvert, which is located under 6th Avenue SE. To re-establish a more natural connection, the roads would have to be removed.



13. What is the purpose of the wildlife crossings? The only types of wildlife mentioned in the DSEIS are the endangered species, i.e. fish and eagles. What habitat types does it connect? What are the targeted species?

Thank you for the opportunity to comment on this document. If you have any questions about this letter or our regulatory program, please contact Anne Robinson, Project Manager, at (206) 764-6951 or via e-mail [Anne.M.Robinson@nws02.usace.army.mil](mailto:Anne.M.Robinson@nws02.usace.army.mil).

Sincerely,



Michelle Walker, Chief  
South Application Review Section

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8. The only surface connections between Wetlands GW and RD, and Wetlands GW and VL, are the culverts described in response to comment #7 above. These culverts will not be affected by the proposed project.

9. The culvert beneath the abandoned railroad bed connects the northwest corner of Wetland GW and the southeast corner of Wetland HS. This connection is believed to be generally level, with drainage occurring during periodically from Wetland HS to GW. Replacing this culvert is not proposed in this project scope. All mitigation will occur on one (or both) of the mitigation option sites.

10. The wetlands may have been historically connected. They are still connected via culverts, as described in Response #7, 8, and 9. Re-establishing more natural connections would require removing the abandoned railroad bed and removing city roads, which is not feasible at this time. The project will mitigate for all impacts as described in the Conceptual Mitigation Plan (2005).

11. Impacts to jurisdictional ditches will be evaluated by the jurisdictional ditch analysis and impact analysis associated with the U.S. Army Corps of Engineers 404 permit. The alternatives analysis to determine the LEDPA is described in the CP3 Packet and is ongoing.

12. The project area is located at the base of extensive public lands (Tiger Mountain and lands east of SR 18) that provide important wildlife habitat. Other important habitat areas include forested lands north of I-90 and lands to the east (Squak Mountain). The wildlife crossings at I-90 are important for regional wildlife movement. It is also important to maintain corridors between Tiger and Squak Mountain, although these corridors are likely further south of the SE Bypass corridor. The purpose of examining wildlife crossings in the SE Bypass corridor is to ensure that wildlife passage (for local wildlife populations and populations with large home ranges - elk, bears, cougars) at I-90 is not compromised by the project, and to maintain riparian corridors and connectivity for localized wildlife movement (deer, small mammals, amphibians) between Issaquah Creek, the north tributary and Wetland GW, and habitats adjacent to Tiger Mountain.

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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000

TTY 711 or 800-833-6388 (For the Speech or Hearing Impaired)

September 17, 2004

Ms. Pam Fox  
Project Coordinator  
City of Issaquah  
PO Box 1307  
Issaquah, WA 98027-1307

RE: Ecology Comments on Southeast Issaquah Bypass Draft SEIS, dated June 2004

Dear Ms. Fox:

The following are the Department of Ecology's comments on the City of Issaquah's Supplemental Environmental Impact Statement (SEIS) for the Southeast Issaquah Bypass project. The wetlands comments were composed by Ms. Kim Harper, and Mr. Jerry Shervey prepared the water quality comments. Ms. Harper and Mr. Shervey serve as Ecology representatives on the Multi-Agency Permitting Team located in Ecology's Northwest regions.

#### 1. WETLANDS

With the proposal of the newer South C alignment, potential wetland fill impacts are significantly reduced from the old South B alignment (from 0.92 acre to 0.16 acre). The South C alignment also has less fill impacts in wetlands than the current South A alignment. For this reason, Ecology prefers the South C alignment with regards to wetlands. Ecology recognizes the effort made to minimize wetland impacts by the project designers in developing the South C option.

The wetlands were originally delineated in 1997, and project documents do not indicate any more recent confirmation of wetland boundaries. There is also no indication that the U.S. Army Corps of Engineers ever verified the wetland delineation. It is possible that wetland boundaries have changed since the delineation occurred, or that there were inaccuracies in the original delineation. **Therefore, estimated wetland impacts in the SEIS may not be accurate.** Wetland boundaries should be re-confirmed and then verified with the Corps so that the project documents reflect the most accurate impact estimates.

The SEIS states on page 4-88 that South Pond C-2 would discharge into Wetland HS, and that this pond along with North Pond 2 are designed to overflow into this wetland during large storm events. South Pond C-1 would discharge to Wetland GW. Wetlands should not be receiving stormwater discharges, as this may result in degradation of a water of the state. Stormwater pond discharges generally do not mimic natural water flow patterns into wetlands and typically increase water level fluctuations. Stormwater ponds also do not remove all of the pollutants in the road runoff that enters them. **Ecology strongly discourages the discharge of stormwater into Category I and II wetlands.** The City should provide an assessment of potential impacts to Wetlands HS and GW from the stormwater discharge, including impacts to wetland hydroperiod (depth, duration and extent of ponding; water level fluctuations; effects of replacing outlet culvert for Wetland HS) and water quality.

1. The South A alignment (associated with Modified Alternative 5) was chosen over the South C alignment as the alternative that meets the purpose and need of the project, while minimizing identified impacts, both natural and socio/economic. The alignment of South A has been modified since the SDEIS to further minimize wetland impacts. South A would fill 0.59 acre of wetland, shade 0.32 acre of wetland, and impact 0.36 acre of buffer. South C would fill 0.16 acre of wetland and permanently impact 0.93 acre of buffer. The alternatives analysis found that the South C alignment would not improve traffic congestion, as the bypass would funnel traffic into 2nd Avenue, the Sycamore and Lewis Lane neighborhoods, three schools, the school district bus barn, and other streets. Please refer to the CP3 Packet for more information.

2. The four wetlands delineated in the area of South A in 1997 were re-examined in the field by Herrera in 2005. The boundaries of each of the wetlands were confirmed, with the exception of an adjustment to Wetland VL, and the addition of an upland inclusion in Wetland GW. The Hope wetland was also delineated during these 2005 site visits. Please see FEIS for more information. The wetland delineations will be verified by the Corps during the 404 permitting process.

3. Modified Alternative 5 would not entail discharges to Wetland HS under most circumstances, because it is expected that North Pond N-2 would infiltrate nearly all of the runoff directed into it. The overflow channel from this pond would direct flows under extreme storm events into wetland HS, but the occasional nature of those discharges is not expected to cause any noticeable effects on the hydroperiod of Wetland HS.

The SEIS states on page 4-81 that a portion of Wetland GW meets the criteria for Category I, using the 1993 Ecology rating system. However, the entire wetland received a rating of Category II. This apparently was based on the fact that the Category I forested area is outside the project area and "the majority of the wetland is dominated by scrub-shrub and emergent plants" (SEIS, page 4-81). **This is not an appropriate manner in which to rate wetlands.** The alternatives offered in the rating system for such a wetland are to either rate the entire wetland as Category I (the higher rating) or to assign a dual rating. To justify a dual rating, there must be a clear boundary that separates the Category I from the Category II area. If the Category I rating is based on the presence of a mature forest (no information about the tree size or forested extent in the wetland is provided in the SEIS), the boundary between the categories should be set at the edge of the mature forested area. Such a boundary is not shown on the wetland maps in the SEIS. If a dual rating is proposed for this wetland, adequate justification for this must be included along with the supporting data forms and appropriate maps. **Apparently, none of the documents associated with the project include Ecology rating forms for any of the wetlands, nor do the documents provide clear rationale for the ratings. This issue was raised in letters from Ecology dated August 14, 2000 and November 16, 2000.**

Wetlands that are divided by artificial boundaries such as roads or railroad embankments should be rated as if they were not divided if there is a level surface water connection between the two portions of the wetland that permits flow of water, fish or other organisms in both directions. The SEIS indicates that Wetland HS is hydrologically connected to Wetland GW by a culvert under the railroad embankment, but does not state whether the flow in the culvert is generally unidirectional or if water can flow in both directions. Similarly, Wetland RD is separated from Wetland GW by a narrow road (SE 96<sup>th</sup> Street) but the SEIS does not state whether there are any culverts connecting the two wetlands. **Therefore we cannot assess whether the rating for Wetlands HS and RD are appropriate. This issue should also be assessed with regards to Issaquah Code since buffer and mitigation requirements for the City depend on the wetland rating.**

Impacts to wetland buffer area can only be fully assessed once the ratings of Wetlands HS and GW have been confirmed, since buffer widths vary with wetland rating. Additionally, the rating of Wetland HS affects the mitigation replacement ratio and thus the extent of required mitigation cannot be known until the ratings are clear.

South Pond C-1 encroaches well into the buffer for Wetland GW. **Stormwater facilities should be placed outside of wetlands and buffers whenever possible.** If site constraints require the placement of the pond in the wetland buffer, then efforts should be made to shape the pond so it can be situated in the outer half of the buffer, and the buffer between the pond and the wetland should be enhanced if possible, as well as providing mitigation for lost buffer.

The SEIS describes fill impacts to Wetland HS, but does not provide an assessment of impacts to wetland functions for either Wetland HS or Wetland GW. Placing a four-lane road in or directly adjacent to wetlands will most certainly impact functions such as aesthetics, water quality and quantity, and disturbance to wildlife species using the wetlands. For example, page 4-105 of the SEIS (vegetation and wildlife section) states that operation of the bypass would deter some wildlife from the project area, yet this is not reflected in the wetland impact assessment section. **This assessment should be included in the FEIS.**

The proposed wetland creation area would be contiguous with Wetland GW and should therefore be assigned the same buffer width. Wetland GW has a 100-foot buffer under Issaquah Code, but the

(3. cont'd.) Modified Alternative 5 would routinely discharge stormwater runoff into the north tributary to Issaquah Creek (Lewis Lane Tributary) which flows through Wetland GW. The discharges from this pond are not expected to measurably alter the hydroperiod of Wetland GW, as the pond would control flows to match forested flow durations up to the 50-year recurrence interval event, thus preventing "flashy" discharges into the large wetland that could otherwise induce minor hydroperiod effects.

This pond would overflow uncontrolled into the north tributary stream channel (and by extension, Wetland GW) in an extreme event exceeding the 50-year design event, but in that condition the short-term effects on what would likely be a flooded wetland would not induce changes in wetland vegetation or morphology. Treatment of stormwater in Pond S-1 would remove much of the pollutant load in runoff discharged from the project site into the north tributary and Wetland GW. Modified Alternative 5 also includes installation of a sanitary sewer for portions of the residential neighborhood bordering the west edge of Wetland GW, which would provide water quality benefits for the north tributary and possibly in the western parts of the large wetland complex. These effects are discussed in Attachment C (Revised Stormwater Analysis) to the Concurrence Point 3 Packet and in the FEIS.

4. The wetland ratings have been adjusted to meet the standards in Ecology's *Washington State Wetland Rating System for Western Washington* (Hruby 2004). Because Wetlands GW, VL, HS, and RD all have surface connections but are bisected by human-made features, they were considered to be one assessment unit. The wetland unit received a rating of Category II. The Hope Property Wetland was also rated using this rating system, and is defined as a Category II. Please refer to the FEIS for more information. The rating forms were attached to the Appendix of the Conceptual Mitigation Plan (Issaquah 2005).

5. As stated in Response 4, Wetlands GW, VL, HS, and RD were rated as one unit because they have hydrologic connections. The FIES and the Conceptual Mitigation Plan also discuss City of Issaquah ratings and mitigation ratios.

6. South Pond S-1 will be located outside of the 110-foot buffer of Wetland GW.

7. Wetland and buffer impacts expected within the project area are discussed in the FEIS and the Conceptual Mitigation Plan. No impacts on functions of Wetland HS are anticipated under Modified Alternative 5. The analysis describes direct impacts (filling) and indirect impacts (shading) to Wetland GW, as well as impacts to GW's buffer. A specific functions analysis and justification will be provided when a final decision has been made regarding the mitigation site.

Ms. Pam Fox  
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mitigation area is shown as having a 50-foot buffer. Reduced buffers on mitigation areas are rarely justified. **The mitigation site should have an adequate buffer or be re-located.**

The SEIS does not discuss in any detail how the proposed mitigation would replace lost wetland functions. **This assessment should be an integral part of the mitigation plan.**

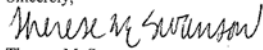
## 2. STORMWATER

Page 4-43 of the SEIS states that North Pond 1 can be assumed to infiltrate stormwater at a rate of 2 inches per hour. A nearby infiltration pond was constructed by WSDOT for the I-90 Sunset Interchange project. WSDOT project Engineer Cathy George reports that this pond infiltrates at an average rate of 0.5 inches per hour as it is now constructed. This rate is considerably lower than that predicted by designers. To address this problem, WSDOT is planning to modify the Sunset Interchange pond to be a detention pond with primarily surface water discharge. They will likely compensate for the additional surface water into Issaquah Creek by controlling flows higher in the watershed. Ben Giddings of Port Blakely Communities also reports that ponds constructed for Issaquah Highlands do not provide any infiltration. Water from those ponds is now piped down the hill to an infiltration gallery near the I-90 Front Street Interchange. Recently-constructed facilities in Issaquah have failed to infiltrate as predicted. The consequence of failed infiltration ponds is localized flooding. **Project proponents for the SE Issaquah Bypass should be prepared to use methods other than infiltration to detain storm flows during the winter. Detailed, site-specific studies of soil and infiltration characteristics need to be performed in all areas proposed for infiltration ponds.**

As we had recently discussed, please send future information about this project directly to me at the Department of Ecology, P.O. 47600, Olympia, WA 98504-7600. Direct mailings will ensure timely review and avoid the delay that resulted during the review of the SEIS. Any SEPA documentation should also be sent to the SEPA coordinator at the Department of Ecology.

Please do not hesitate to contact me at 360.407.6789 should you have questions, concerns, or comments. I look forward to working with you on the next phases of the City's project.

Sincerely,



Therese M. Swanson  
Ecology-WSDOT Liaison

cc: Phil Kauzloric, WSDOT  
Sharon Love, FHWA  
Patty Betts, EPA (Lacey)  
Nancy Brennan-Dubbs, USFWS (Lacey)  
Teresa Eturaspe, WDFW  
Mike Grady, NOAA (Seattle)  
Kate Stenberg, Corps  
Sandi Manning, Corps  
Kim Harper, MAPT Ecology  
Jerry Shervey, MAPT Ecology

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8. The mitigation site will be protected by a 110-foot buffer, consistent with the buffers for all of the wetlands in the project area.

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9. The Final Mitigation Plan will include a detailed discussion and assessment to compare the lost functions with the functions provided by the mitigation.

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10. The FEIS assumes a "base scenario" for stormwater effects that reflects much less infiltration of runoff from the project site. Attachment C (Revised Stormwater Analysis) to the Concurrence Point 3 Packet presents a detailed discussion and calculations of hydrologic impacts for this base scenario, as well as an "alternate scenario" wherein much more project site runoff is assumed to infiltrate at North Pond N-1 (near the I-90 Sunset Interchange) and at South Pond S-1. The project design would focus on maximizing runoff infiltration, and would include extensive in situ explorations at proposed pond sites to confirm realistic infiltration rates to use in pond design.



**MUCKLESHOOT INDIAN TRIBE**  
**Fisheries Division**

39015 - 172<sup>nd</sup> Avenue SE • Auburn, Washington 98092-9763  
Phone: (253) 939-3311 • Fax: (253) 931-0752



July 29, 2004

Bob Brock  
Director  
Issaquah Public Works Department  
P.O. Box 1307  
Issaquah, WA 98027

SENT BY FAX AND MAIL

RE: Southeast Issaquah Bypass Draft Supplemental Environmental Impact Statement (DSEIS) and Section 4(f) Evaluation

Dear Mr. Brock:

The Muckleshoot Indian Tribe Fisheries Division has reviewed the DSEIS for the Southeast Issaquah Bypass proposal. This project has the potential to impact treaty protected fishery resources important to the Muckleshoot Indian Tribe. Therefore, we are forwarding these comments in the interest of protecting and restoring these resources. The Tribe may also comment on impacts to cultural resources in a separate correspondence.

Previously, we commented on the Draft EIS for this proposal. Several of our comments were not addressed in the DSEIS. Therefore, you will find several comments reiterated in this letter, in addition to our specific comments to the DSEIS. If you have any questions, please contact me at (253) 876-3116. We appreciate the opportunity to comment.

Sincerely,

Karen Walter  
Watershed and Land Use Team Leader

Cc: Mike Grady, NOAA Fisheries  
Peter Eun, FHWA  
Dave Scott, WSDOT, Northwest Region  
David Brock, WDFW, Region 4

Muckleshoot Indian Tribe Fisheries Division  
Comments to the SDEIS for SE Issaquah Bypass

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#### Alternatives

From the six action alternatives proposed in the SDEIS, it appears that any of the alternatives that use the South "C" alignment will have less impact on aquatic resources than alternatives that use the South "A" alignment. While we do not have a preference for a particular action alternative at this time, we recommend that the least environmental damaging alternative be chosen. This recommendation assumes that the new road way is necessary and that transportation system management/transportation demand management is not feasible. The SDEIS lacks any detailed discussion to reach the conclusions in Table 2-3. Finally, we also recommend that all impacts be fully mitigated for the action alternative chosen.

#### Chapter 2- Site Description and Affected area

This section should be updated to reflect information found elsewhere in the SDEIS and Biological Assessment (BA) for this project. There are three tributaries affected by the proposal (north tributary to Issaquah Creek, south tributary to Issaquah Creek (also known as WRIA 08.0199, or Kees Creek) and the tributary to the East Fork of Issaquah Creek- see page 3-2 of SDEIS). Only the first two tributaries are discussed on pages 2-30 and 2-31.

Also on page 2-31, as we noted in our previous comments, we found juvenile coho in this stream, which is documented in King County's WRIA 8 coho distribution map and table <http://dnr.metrokc.gov/Wrias/8/fish-maps/coho/index.htm>. This particular data was not cited in the SDEIS. There may also be coho using the northern tributary for rearing and overwintering purposes. Since an instream survey was not conducted as we previously recommended, we recommend that the project assume salmonid use and mitigate accordingly. The SDEIS notes this possibility on page 3-4 and pages 2-30 and 2-31 should be updated accordingly.

#### Chapter 4- Environmental Consequences

On pages 4-34 and 4-37, please clarify if the tributary to the East Fork of Issaquah is part of the affected environment or not. Page 3-2 indicates that this tributary is part of the affected area.

The SDEIS fails to consider potential impacts to salmonids using waterbodies that will receive stormwater. These impacts are different from habitat impacts that are discussed on page 4-47 in the SDEIS. In our previous comments, we noted these impacts at length and pointed out that the King County Stormwater Manual does not mitigate for all impacts as noted on page 1-15 of the Manual. While the SDEIS considers the landscape to be in a pre-developed condition for hydraulic analysis purposes and to size stormwater facilities, the SDEIS fails to discuss the lack of pre-developed conditions in the waterbodies affected by this proposal, particularly the northern tributary of Issaquah Creek. Since this tributary (and the other waterbodies in the project area) has been affected by past and current land use actions, they are not as capable as undeveloped streams to receive higher volumes of water for longer durations due to stormwater. The result is that aquatic life will be exposed to the stormwater with little opportunity to find refuge in the existing habitat (see page 4-121 for a description of North tributary habitat). There will be an increase in flows and flow durations even with the implementation of the Level II stormwater detention. The Final SEIS should discuss this issue and the potential impacts to salmonids may occur even with stormwater detention, unless 100% of the stormwater will be infiltrated, which appears unlikely based on the SDEIS.

One mitigation measure has been identified in the BA for the project, which is to create off-channel or overwintering habitat for salmonids to mitigate for the increase in stormwater discharged to the north tributary to Issaquah Creek. The created off-channel habitat site will need to be accessible to salmonids for a variety of flows and should not cause fish to become stranded when flows decrease. The SDEIS considers placing wood as mitigation, which may also work, provided the wood is of sufficient size and frequency. Similar mitigation may be necessary for the East Fork of Issaquah Creek, if the North Pond 1 cannot be enlarged as recommended on page 4-45 and flows greater

1. After issuance of the SDEIS, changes were made to Alternative 5, resulting in Modified Alternative 5, and this was chosen as the preferred alternative because it is the only build alternative that meets Purpose and Need and has impacts that can be effectively mitigated. All other build alternatives considered in the SDEIS would either have unacceptable impacts to 4(f) resources or would not meet Purpose and Need. . Reviewing agencies under the 404 Merger Process have provided concurrence that Modified Alternative 5 would be considered the least environmentally damaging practicable alternative. Please see Chapter 2 of this Final EIS and the Concurrence Point 3 Packet for more discussion on /Modified Alternative 5.

2. Comments noted. Please see the water quality, fisheries, and threatened and endangered species sections of Chapter 3 of this FEIS for updated information on these species. A revised Biological Assessment will be issued with this FEIS.

3. The proposed project's northern area is near the East Fork of Issaquah Creek. There are no tributaries to the East Fork that are part of the affected environment. Several small drainages coming from the north end of Tiger Mountain drain into the East Fork, but those drainages are located upstream (east) of the proposed project's limits. Potential impacts to the East Fork of Issaquah Creek are identified in Chapter 3 of this FEIS.

4. Additional information on water quality and stream impacts under Modified Alternative 5 is provided in Chapter 3 of this FEIS. The overall condition of Issaquah Creek and its tributaries is not considered to be generally degraded, nor is the surrounding area extremely developed. The headwaters of the north tributary is located in Wetland GW in the project area, at the base of Tiger Mountain. Farther downstream, the riparian area is fairly well vegetated, and the tributary flows through the Hope Property Wetland. Supplemental analysis of existing hydrologic conditions and potential permanent storm water impacts was conducted by the City and provided in their Concurrence Point 3 Packet. Associated mitigation measures have been expanded. This information is reflected in the text of the FEIS in Chapter 3. A greater level of surface hydrology and water quality protection would be provided, to the extent that is expected to effectively prevent effects on streams in the project area.

5. Your comments have been noted and will be considered for the Final EIS. Please see Chapter 4 of this Final EIS for more information on mitigation measures under Modified Alternative 5.

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than a 4 year interval are discharged to the creek.

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5. The Conceptual Mitigation Plan describes the proposed mitigation within the north tributary of Issaquah Creek. Mitigation would include creation of off-channel habitat, installation of large woody debris, and in-stream improvements within the north tributary. If North Pond N-1 cannot be designed as an infiltration pond (as previously proposed in the SDEIS), it would be designed as a conventional detention pond that discharges to the East Fork of Issaquah Creek. Outflows from the pond would be controlled to match forested flow peaks and flow durations for all storms up to the 50-year statistical recurrence interval (King County Level 2 flow control criteria), and thus it is expected that onsite runoff entering the East Fork of Issaquah Creek would not cause a substantial change to in-stream flow conditions during high flow events. During lower flow conditions, the addition of a minor amount of runoff flow from the project area via North Pond N-1 would not be expected to adversely affect in-stream flow characteristics for fish. Thus, habitat mitigation within the East Fork is not proposed.





## **Individual Comment Letters**



Mr. Bob Brock  
Public Works Director  
Issaquah Public Works Department  
PO Box 1307  
Issaquah, WA 98027

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PUBLIC WORKS ENG.

July 30, 2004

Dear Mr. Brock,

Issaquah Environmental Council (IEC) is a grassroots nonprofit with a history of community involvement since 1985. Our purpose is to preserve and enhance the quality of life in and around Issaquah and our goal is to promote local citizen involvement in governmental decisions which affect their community.

We have evaluated the Supplemental Draft Environmental Impact Statement for the SE Issaquah Bypass project and have the following comments:

1. This proposed arterial does not provide a solution to Front St. traffic congestion, as required by the Purpose and Need Statement. The added congestion from this road to the I-90 interchanges at Front St. and Sunset Way and south of its terminus with Front St on Issaquah-Hobart Road far outweigh its short term reduction in congestion on Front St. between Gilman Blvd. and Clark St.
  - The bypass would make Issaquah a "Factoria Style" pass-through commuter crossroads, rather than an economic destination where people stop, stay, and spend.
  - Olde Town businesses could see significant drops in business from impulse shoppers passing through.
  - Other critical traffic projects like traffic light synchronization, widening Newport Way and an additional I-90 under-crossing would provide greater decreases in congestion at much less cost.
  - The induced traffic brought on by the proposed bypass would soon create greater noise impacts and air quality concerns for the entire city.
  - This road, although purported to be multimodal, adds little to no increased transit service.
2. This proposed project does not have any build options that can be built within the City of Issaquah without Code exemptions. City Code has been developed with community input to protect and preserve sensitive areas and socially significant aspects of our environment. We feel it is not reasonable or fair to exempt a project which would benefit a small segment of users (primarily commuters) at the expense of the larger community.
  - Flooding risks are a great concern for residents of this city built on wetlands: Stormwater would be infiltrated in facilities that have historically been shown to be ineffective. Detention and infiltration ponds located in floodways and floodplains cannot be expected to provide the water storage that currently is achieved by native vegetation and soils. The impervious surfaces of this road placed on high recharge areas combined with less than

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1. Traffic modeling for Modified Alternative 5 indicates that volumes on Front Street would decrease with the proposed roadway and that north-south travel conditions and accessibility to I-90 from Front Street and the proposed SE Bypass roadway would be greatly improved with the new roadway.

2. The proposed roadway is intended to accommodate pass-by trips between I-90 and Issaquah-Hobart Road where stops in Issaquah are not desired and improve travel to and from Front Street businesses.

3. Widening of Newport Way was considered by the City not long ago, but expanding this road to four lanes was rejected by the City Council as having too great of impact on that area of Issaquah. The resulting design for Newport Way, which is included in the Transportations Improvement Program in 2012 (or beyond), is intended to primarily address safety issues and calls for a two lane road with a center turn lane. Other potential improvements, addressed in Chapter 2 of the Final EIS, are not considered to have a significant effect on improving traffic flow on Front Street South.

4. Substantial adverse impacts on air quality and noise are not expected to occur under the proposed project. Please see the air quality and noise sections of Chapter 3 of this Final EIS for impacts and mitigation measures associated with Modified Alternative 5.

5. The proposed roadway would accommodate use by transit vehicles. The need for increased transit service to Issaquah via the proposed roadway would be determined by city and county transit service providers. The proposed roadway would include pedestrian and bicycle facilities for non-motorized travel.

6. Where permit requests include the need for code exemptions, the proposed project would be subject to conditions prior to permit approval. Such conditions would be expected to address impacts on sensitive areas and the community that may be associated with granting the potential exemptions. The proposed project would follow all conditions required for requested permits.

7. The FEIS assumes a "base scenario" for stormwater effects that reflects much less infiltration of runoff from the project site. The City's Concurrence Point 3 Packet presents a detailed discussion and calculations of hydrologic impacts for this base case scenario, and an "alternate scenario" where more project site runoff is assumed to infiltrate at North Pond N-1 and at South Pond S-1. The project design would focus on maximizing runoff infiltration, and would include extensive on-site explorations at proposed pond sites to confirm infiltration potential for ponds. The FEIS includes additional discussion about potential effects on flooding downstream of the project corridor. Wetland fill associated with this project would displace stormwater detention functions provided by the wetland; however, this wetland fill would be compensated for in the project mitigation plan and the project's stormwater detention facilities would compensate for the lost stormwater attenuation function of the filled wetland area.

8. The SDEIS identifies alternatives considered prior to advancing those evaluated for the proposed project. Alternatives selection followed an appropriate screening process and was consistent with NEPA guidance. Existing corridors were considered in several locations and were not advanced where they could not meet the proposed project's purpose and need, and/or where a high level of potential impacts could be identified.

9. Substantial conflicts exist between wildlife and humans in the neighborhoods of Issaquah. Therefore, it is unwise to provide movement corridors through the SE Bypass project area that direct wildlife into these areas of conflict. Hence, the decision to maintain a corridor at the north tributary coupled with buffer enhancement so that wildlife can move with the benefit of security to other suitable habitats in the Issaquah Creek corridor. The City has agreed to participate monetarily to help initiate a study and planning effort to address regional wildlife connectivity, and to facilitate a discussion with WSDOT during the project design stage to evaluate maintenance needs at the existing

effective storage facilities would create potential for increased flooding throughout Olde Town.

- This project, like the Issaquah Highlands and Sunset Interchange, is based on ability to infiltrate stormwater to protect aquifer. Preliminary studies show limited infiltration capacity.
- Our city's highest class of wetland is filled and its buffers are reduced to zero.

3. NEPA requires that options be chosen that preserve local features unless there is no other reasonable alternative. The SDEIS claims that there are no reasonable alternatives. IEC disputes this claim and proposes that the following impacts would be avoided by improving existing corridors.

- Such a road would create a barrier in the wildlife movement between Tiger Mountain and the valley floor with 4-7 lanes of 35 mph. The one (or two) proposed "wildlife crossings" are a ludicrous nod to wildlife impact mitigation. This road would cause huge mortality issues. This new road's construction would force increased wildlife density and conflict with humans onto Tradition Plateau and southern Tiger Mountain.

- Noise impacts at Issaquah H.S., Clark Elementary and Tiger Mt. H.S. would degrade student learning environments. The SDEIS did not adequately evaluate mitigations necessary to offset this concern. Noise impacts to other areas of town were not considered, yet noise bouncing off concrete walls and traveling uphill would bring ambient sound in Squak Mountain neighborhoods and Issaquah Highlands commercial areas to unacceptable levels.

- The narrow valley between Squak Mountain and Tiger Mountain creates a bottleneck for air pollution in southern Issaquah. Induced traffic flow in this area would increase levels of particulates and noxious fumes to uncomfortable levels.

- The bypass would replace forested hillsides with multiple retaining walls, but the SDEIS hardly examines the extent to which this would impact views throughout Issaquah. It is silent on the number of additional mature trees which would become "danger trees" outside the project and would need to be removed. No elevations were presented for consideration. There is little landscaping shown and no discussion of the road's appearance until that landscaping becomes mature—20 years out.

- This road would require cuts into forested, extremely steep slopes mapped as landslide hazard areas. Given the City's experience with similar geology north and west of the Sunset Interchange, this project merits in-depth study of soils and hydrology which seems to be missing from the SDEIS.

- The proposed bypass would require purchase and demolition of 4-10 homes, including one of only two Habitat for Humanity homes in Issaquah. Additionally, access would be disrupted to as many as 15 close-in homes and the project footprint would come within feet of at least 5 others, which was not discussed in the SDEIS.

- This project "may affect and is likely to adversely affect" Chinook Salmon, which is an icon for the Issaquah community.

- The heavily used, rural Issaquah Trail would be replaced by a sidewalk on a 4-7 lane, 35 mph road. Access to Tiger Mountain recreational trails will be extremely limited.

4. Cumulative impacts of this segment of a formerly connected group of projects (Issaquah Highlands, Sammamish Plateau Access Road, Sunset Interchange) were not adequately addressed in the SDEIS.

- All of the alternatives studied by Park Pointe, a potential urban village styeo development east of the proposed road require the SE Bypass. If the Bypass were built, it would be providing publicly funded access to this currently land locked parcel behind Issaquah High School.

- This road, by providing ready access to rural areas south of town, would create pressure to move the Urban Growth Boundary south.

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Wildlife crossings on I-90 in coordination with WDFW and USFWS. It is difficult to predict the level of mortality that will occur on the roadway although the DSEIS acknowledges this may occur. Where the roadway is confined by retaining walls, little mortality is expected because wildlife could not access the corridor. Where the roadway crosses at-grade, wildlife could suffer mortality. Also, some wildlife will not attempt to cross the corridor given the high volume of traffic expected on the roadway.

10. It is correct to say that noise can travel from low-lying areas to areas above. However, Squak Mountain residences are located further than one-half-mile from the project area. Residences at this distance would not experience a noticeable change in noise levels from the project. As a comparison, Noise Receptor I is located 250 feet west of the project. Existing and future noise levels at Noise Receptor I are predicted to be 60 dBA for the existing conditions and future conditions with the project. With no change in noise levels resulting from the project at 250 feet, no noticeable change in noise levels resulting from the project are predicted at residences located at least one-half-mile from the project on Squak Mountain.

11. The Environmental Protection Agency has set National Ambient Air Quality Standards which specify maximum concentrations for carbon monoxide (CO), particulate matter less than 10 micrometers in size (PM<sub>10</sub>) and less than 2.5 micrometers in size (PM<sub>2.5</sub>), ozone, sulfur dioxide, lead, and nitrogen dioxide. The project area is in compliance with these standards for all pollutants, but because the Carbon Monoxide (CO) standards have been recently attained, the project is within a CO maintenance area, therefore local intersection level CO analysis was conducted. This analysis concluded that CO levels near project intersections would be within EPA standards. The Puget Sound Clean Air Agency (PSCAA) is responsible for monitoring, setting standards, and regulating development to achieve regional air quality standards in the King, Kitsap, Pierce, and Snohomish counties. For additional information regarding air quality in the region, please visit the PSCAA website at: <http://www.pscleanair.org> or call the PSCAA at 206-343-8800. Regional air pollutant trends have generally followed national patterns over the last 20 years. While the average weekday vehicle miles traveled in the central Puget Sound region has increased from 30 million miles in 1981 to 65 million in 1999, pollutants associated with transportation sources have decreased over time due to more stringent federal emission standards for new vehicles and the gradual replacement of older, more polluting vehicles. The downward trend for pollution emissions is predicted to continue with the implementation of the EPA Tier II Gasoline/Sulfur Rule.

12. Potential visual impacts from the proposed project are addressed in the SDEIS. Visual analysis follows FHWA guidance for evaluating potential impacts on visual quality and was reviewed and approved by FHWA and WSDOT prior to DSEIS issuance. While the proposed project may require removal of some existing trees along the base of Tiger Mountain, it is not expected to result in significant losses of large stands of trees, or to create the need for large-scale removal of trees, along the proposed project route. It is acknowledged that portions of the proposed roadway may be more visible from some view locations until proposed landscaping has time to grow.

2 of 3

- By causing a bottleneck at 2-lane Issaquah Hobart Road, a county road with no plans of expansion in the foreseeable future, the bypass would create pressure to widen Issaquah Hobart in an environmentally sensitive rural area. This would raise the potential for a major north-south freeway through rural areas, contrary to the Urban Growth Act.
  - The SDEIS further fails to evaluate the change in business patterns created by diverting large amounts of traffic from the Central Business District. IEC believes that East Issaquah would become a "Factoria Style" pass-through commuter crossroads, rather than an economic destination where people stop, stay, and spend.
5. As a contentious, community-dividing project, the SE Bypass does not have adequate funding in the foreseeable future. To continue to focus on this road as the only means of relieving traffic congestion in Issaquah is an affront to Issaquah residents, who would most likely be major funders of this project.
- The SDEIS does not evaluate the No Build option to include minor improvements to existing roads that would alleviate some of the troublesome congestion. Nor does it suggest a level of advocacy by the City to promote additional transit and/or regional projects that would lessen traffic in Issaquah.
  - If this road were built, funding would not be available for other critical traffic projects like traffic light synchronization, expansion of Newport Way and the I-90 under-crossing.

The SE Issaquah Bypass SDEIS is fatally flawed in its examination of this road's Purpose and Need, the impacts it would generate, and its financial feasibility. After \$4million in expenditures, it is possible to acknowledge that this project has far more costs than benefits. The preferred alternative chosen by City Council should be the No-Build option. As none of the options presented fulfill the need of the road, the No-Build option, as the least environmentally harmful is the required choice.

Sincerely,

*Barbara Shelton*

Barbara Shelton, President  
Issaquah Environmental Council

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As the DSEIS indicates, depending on the location, existing vegetation and topography would help block views and screen the roadway from many view locations. In locations nearer to the roadway, landscaping is intended to diminish potential view impacts. Although landscaping would become more effective over time, no substantial visual impacts are expected to occur while landscaping matures.

13. Additional subsurface exploration would be needed at the design level for the proposed walls in the north project area. Subsurface geologic conditions vary widely in the area and it is not possible to compare conditions at nearby locations with those in the SE Bypass project area. The project has included a detailed analysis of existing surface and subsurface hydrologic conditions in the project area.

It is acknowledged that large retaining walls proposed in the northern part of the project corridor could intercept shallow ground water on the affected hill slope area. These effects are discussed in Attachment C to the City's Concurrence Point 3 Packet and in Chapter 3 of this FEIS. Walls would be designed and constructed with careful protection to avoid hillslope failure as a primary consideration.

14. Modified Alternative 5 was chosen as the preferred build alternative and would not displaced the home built with Habitat for Humanity assistance. The Final EIS acknowledges that Modified Alternative 5 would displace up to eight residences and that such displacements would be subject to compensation and assistance provided under the Uniform Relocation Act. The SDEIS indicates that potential disruptions to access could occur during construction. Afterward, no long-term impacts on access to local residences would occur. Proximity impacts are addressed throughout the DSEIS under individual elements where impacts could occur, such as noise, air quality, social, and visual elements.

15. As discussed in the revised biological assessment and in the FEIS, the "effect determination" on chinook salmon and bull trout (and steelhead) has been updated to "may affect not likely to adversely affect" due to additional conservation measures that have been incorporated into the project plans. These conservation measures include measures to improve water quality in project area streams and stream restoration improvements in the north tributary downstream of Front Street South. See Chapter 3 of this FEIS for more information.

16. The proposed project would preserve access to Tiger Mountain trails, although it would change how trails may be reached. Proposed sidewalks and signalized crosswalks would provide continued access to local trails. In the northern project area, a new trailhead parking lot is proposed south of East Sunset Way to accommodate individuals and groups that use vehicles to reach northern trailhead destinations. In addition, while it is used by the public the Issaquah Trail is not a formal trail because it is located on private property.

17. Cumulative impacts were addressed in the SDEIS and are included in Chapter 3 of this Final EIS, as detailed under each discipline. It was concluded that the mitigation being proposed to offset the identified impacts will be effective in addressing cumulative impacts caused by this project and other transportation and development projects currently proposed. For example, stormwater impacts are mitigated to result in no-net increase in pollutant loadings to receiving waters, and infiltration of stormwater will mitigate hydrologic impacts to pre-project conditions. The effects on the environment will be no different if other projects, such as Park Pointe, are constructed. Cumulative impacts that could be caused by future growth are addressed by current land use regulations, which effectively limit the amount of additional development that could occur in the project vicinity.



Mr. Bob Brock  
Public Works Director  
Issaquah Public Works Department  
PO Box 1307  
Issaquah, WA 98027

RECEIVED July 30, 2004

JUL 30 2004  
PUBLIC WORKS ENG.

Dear Mr. Brock,

The Issaquah Alps Trails Club (IATC), representing over 600 members united in purpose to “protect, promote, preserve, and enhance open space lands, hiking trails, recreational opportunities, and environmental qualities of the Issaquah Alps area,” offers comments below on the DSEIS for the proposed SE Bypass project.

IATC acknowledges the severity of traffic problems in Issaquah and agrees that measures to mitigate traffic impacts should be pursued. However, IATC fundamentally disagrees with the entire concept of the SE Bypass for many reasons and believes that more effective, potentially cheaper options should be pursued instead.

To address the SDEIS specifically, we strongly disagree with the documented “Purpose of the Proposed Action” (p. S-2) that states,

“The new roadway would relieve existing traffic congestion...and provide improved mobility throughout the eastern portions of the city. (It) would increase the local road network’s capacity, improve the existing level of service,...provide an important new link in the regional roadway system, and promote multi-modal transportation options by including pedestrian, bicycle, and recreational trail connections.” (SDEIS, p. S-2)

Even if this statement were accepted as fact, the essential question that must be asked is, “At what cost? (monetarily, socially, environmentally, visually, and more)? But, despite the tone of certainty of this statement, IATC does NOT accept this documented purpose as fact, instead believing a more certain outcome if a bypass were to be built is:

A permanent, landscape-altering, environmentally damaging road construction project that will forever degrade the character and quality of life in Issaquah while providing little or no long-term traffic relief. The bypass will instead only encourage more regional traffic to use Issaquah roads and facilitate a major private development (Park Pointe) that will flood thousands of new car-trips/day onto the bypass and other Issaquah roads. A new saturation point will quickly be reached as Issaquah-Hobart Road, the bypass, AND Front St. (as well as Newport Way and Old Town streets) are ALL clogged with polluting traffic jams. Issaquah will have

18. Park Pointe does not require the SE Bypass under any development scenario. As noted in the SE Bypass SDEIS, the original development proposal under the Urban Village land use designation did rely on the SE Bypass to achieve full development density. The Park Pointe developer has indicated access to the property is available via local streets without access from the Bypass. Entrance roads to Park Pointe are shown on project illustrations only as potential points of access. They will not be constructed unless approved and paid for by future developers of this site.

19. Your comments have been noted and will be considered in the City's decision for this project. The proposed project is not intended to influence the location of local urban growth boundaries. Decisions regarding the urban growth boundary would be made by city and county planning officials and would be subject to a lengthy public review process prior to potential changes.

20. If changes are proposed to Issaquah-Hobart Road, future environmental evaluation would occur, including impacts on sensitive areas, prior to approval. Similarly, considerable public review and evaluation would be required prior to consideration of locating a new north-south freeway in east King County. No such plans have been identified at this time.

1 21. The proposed project is intended to address pass-through traffic that is traveling between I-90 and Issaquah-Hobart Road, as stated in the Purpose and Need. This traffic, which overwhelms the current road system because there are no alternate routes through downtown Issaquah, is preventing easy access by other motorists who do want to visit and shop at these CBD businesses. The proposed project is intended to separate these distinctly different types of traffic.

22. Funding for the proposed roadway would be determined by the City and would likely be provided through a combination of local, state and federal funding sources. The city would be responsible for between 14-20% of the project cost.

2 23. The purpose of the No-Action alternative is not to identify and evaluate other alternatives, but rather to provide a baseline that the build alternatives could be compared to. Please see Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Whether funding affects other future transportation project cannot be determined; however, the city would be responsible for only 14-20% of the project cost, leaving funds for other project.

24. Your comments are acknowledged and will be considered by the City. The proposed project's purpose and need was carefully developed in coordination with FHWA, WSDOT, the City, and reviewing agencies. The SDEIS and this Final EIS have been reviewed extensively by state and federal agencies and provide adequate information to evaluate impacts associated with the remaining alternatives. The City Council, through their funding authority, will determine if potential impacts associated with the proposed project outweigh the benefits of the project.

1. Your comments are noted and will be considered in the City's decision on this project.

2. The DSEIS considers impacts associated with the proposed project and identifies mitigating measures for elements of the natural and social environment. The proposed project's purpose and need was developed by the City in cooperation with state and federal agencies. Chapter 1, in which the purpose and need is identified, provides additional background regarding reasons why the project is being proposed.



sacrificed its quality of life, it's documented "treasures", its finances, and its environmental and scenic values for the sake of fictional, temporary traffic relief.

While IATC could offer pages of comment opposing the concept of the bypass, we have only focused on specific SDEIS issues and questions and have documented these in terms of "Issues" to readily highlight IATC's concerns regarding this document:

**Issue #1:** The SDEIS fails to adequately assess the cumulative impacts of multiple traffic routes all feeding into the two-lane Issaquah-Hobart Road at the south end of town, i.e. if a bypass were built (four lanes), and its traffic levels combined with those from Front St, Second Ave, and Newport Way, which all funnel traffic onto Issaquah-Hobart Rd and its single south-bound lane, how can traffic backups on all of these roads possibly be avoided? In fact, won't a minimum of at least four lanes of heavy southbound traffic all be forced to funnel into one lane at the south end of town? Why was this scenario not evaluated? These traffic counts must be included in an FEIS with the results shown for each of these roads listed, and for what the cumulative impact will be on Issaquah-Hobart Rd south of town.

**Issue #2:** The SDEIS inadequately addresses the entire issue of a future Park Pointe development. Will a publicly funded bypass provide the transportation facilities necessary for a private developer to go forward with their major, lucrative development? How much in road mitigation fees would Park Pointe pay for the bypass? How many thousands of cars/day would this add to the bypass and how does this affect the modeled capacity? How do stoplights at the Park Pointe entry affect traffic flow and backups? Why isn't Park Pointe being required to utilize another main entry and access instead of a publicly funded bypass? What percent of bypass capacity would be consumed by Park Pointe car-trips each day?

**Issue #3:** A "no-build" alternative was not adequately considered. There are other City options available besides construction of a new bypass to assist in traffic relief (Second Ave, a third crossing under I-90, expanded Newport Way, all of which could likely be completed for much less cost than the bypass). An expanded SR-18 will also benefit Issaquah traffic when completed. None of these alternatives and their beneficial impacts were analyzed or adequately addressed in the SDEIS. The final EIS should identify, analyze, and consider these other options as part of the no-build alternative and compare cost/benefits with those expected from the bypass. No decision on the bypass should be made unless and until these other options have been proven infeasible.

**Issue #4:** Visual impacts are inadequately addressed and fail to disclose what the expected significant, negative, visual impacts would be. The political leaders and citizens of Issaquah, whose "treasures" include the forested slopes above Issaquah, must be provided a true representation of the damaging visual impacts a bypass would cause. Computer-altered photos should be used to provide realistic images of what the cuts and retaining walls would look like from various points along I-90 and throughout Issaquah. Further, no consideration is given to loss of "danger trees" as the large retaining walls are built and trees above these walls die from sun exposure or wind or because of fears they could fall onto the roadway. What setback of trees from the top of all retaining walls is expected and what further effect will this have on visual impacts? (i.e. the visual on page 2-40 implies that large conifers

3. It should be noted that current City streets –Newport Way, Front Street South, and 2<sup>nd</sup> Avenue SE— all currently funnel traffic to the 2-lane Issaquah Hobart Road. The SE Bypass is intended to relieve congestion and reduce traffic on those streets by making them available for local use and allowing pass-through traffic that travels between I-90 and Issaquah Hobart Road to completely bypass these areas.

Impacts of the Issaquah-Hobart Road are described for future year 2030 conditions. Please refer to the discussion on page 2-23 of the SDEIS.

4. The Park Pointe development is not reliant on the SE Bypass for access. As noted in the SE Bypass SDEIS, the original development proposal under the Urban Village land use designation did rely on the SE Bypass to achieve full development density. In 2004 the City Council amended the Comprehensive Plan and changed the land use designation for Park Pointe from "Urban Village" to "Low Density Residential". Under current regulations and plans, up to 356 residential units could be built without access from the SE Bypass road. The Park Pointe developer has indicated access to the property is available via local streets without access from the Bypass. Entrance roads to Park Pointe are shown on project illustrations only as potential points of access. They will not be constructed unless approved and paid for by future developers of this site. There are no other projects in the planning or permitting process that are reliant on, or anticipatory of, the SE Bypass project.

5. Many other alternatives were evaluated, including those suggested in the comment, and are summarized in Chapter 2. Widening of Newport Way was considered by the City not long ago, but expanding this road to four lanes was rejected by the City Council as having too great of impact on that area of Issaquah. The resulting design for Newport Way, which is included in the Transportation Improvement Program in 2012 (or beyond), is intended to primarily address safety issues and currently calls for a two lane road with a center turn lane. The alternative of widening SR 18 is also summarized in Section 2, and but was rejected because the traffic modeling showed it wasn't effective in reducing traffic on Front Street South. The City is currently proposing a third crossing of I-90, the I-90 Undercrossing Project, but that project won't provide any improvement to congestion to City streets south of I-90.

6. through 8. Visual impacts are adequately identified in the SDEIS following state and federal guidance for this analysis, and this analysis was reviewed and approved by FHWA and WSDOT prior to SDEIS issuance. Computer-generated graphics were considered, however, subsequent decisions resulted in the use of different graphic representations in the visual analysis section of the SDEIS. Trees near the roadway would be retained to the extent possible. Landscaping and other measures identified in the SDEIS are intended to reduce potential visual impacts associated with the proposed roadway. Computer-generated graphics were considered but were not included in the final approved consultant contract.

would exist along all steps of the retaining walls. We find this difficult to believe. IATC believes visual impacts will be severe, permanent, and greatly damaging to the scenic, social, and character values of the City. There absolutely must be graphics provided in advance of any decision that clearly portray what these significant visual impacts will be. (Note: We recall the shock caused by the visual changes when Reid Sand and Gravel cleared the trees on the north side of I-90, catching City leaders who hadn't realized what a major landscape change this would bring by surprise. IATC doesn't want City leaders or citizens to be surprised and shocked again by the dramatic visual changes a bypass (and Park Pointe) would bring to the east edge of the city).

**Issue #5:** Surface, groundwater, and slope stability issues are inadequately addressed. Surely, by now, the City has had enough bad experiences with projects that cut into steep hillsides, particularly those known to have seeps, springs, and underground water flow, to know that there are multiple disasters waiting to happen with this proposed project. The current SDEIS doesn't adequately provide sufficient scientific, detailed information to guarantee that construction practices won't damage underground aquifers, surface flows, or create slope and retaining wall stability problems for years to come. The FEIS must go much further in evaluating slope stability and surface/groundwater issues before any decision can be made. The risks are too great, as evidenced by the Sunset interchange blow-out in 2003, to not insist upon absolutely thorough, in-depth, scientific knowledge of these issues, and the guaranteed (and we suggest, bonded) plans for how these issues are expected to be handled.

**Issue #6:** Significant negative impacts to popular, historic, recreational trails are not evaluated sufficiently and are unacceptable. A new bypass would sever the City and its residents from their physical and emotional connection to the lands and trails of Tiger Mountain. The Issaquah Trail, the High School Trail, Tradition Plateau, and the Plateau Access Trail near Sunset Way provide a hugely popular, convenient loop for many local citizens. This loop, and the access routes to Tradition Plateau would be permanently degraded and made much more difficult for public access and use. Portions of the route would become a sidewalk next to a four to seven-lane road. The SDEIS fails to adequately address the impacts to the public on the trails, access routes, and character of the trails that will be impacted by the bypass. The SDEIS and any bypass plans should include and evaluate pedestrian over-crossings of the bypass to enable continuing trail access and a connection of the City and its citizens to Tiger Mountain. Finally, a free right turn from Front Street onto the bypass would put Rainier Trail users attempting to cross the bypass at grade at severe risk. This free turn must be eliminated or an over-crossing provided.

**Issue #7:** Streetscape/sidewalk/trail amenities are inadequate and must be addressed. The planned 14' sidewalk and trail along the lower (west) side of the bypass appears to have no separation from traffic, no landscaping, and no safety measures. Instead, it appears there would be a 77 foot-wide strip of solid pavement from edge to edge along the length of the bypass. This is unacceptable and represents a visual, safety, and quality of life failure. Street trees and landscaping must be incorporated into the plan as well as a railing or other safety measure between the sidewalk and traffic if no other separation is provided. We remind you that many schoolchildren would likely use this route and it is a gross safety

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9. The Bypass will require retaining walls along the north end of the project. The purpose of the retaining walls is to replace the lateral support of the hillside in cut areas and to provide support for fills while providing adequate space for the roadway. The retaining walls will be structural and designed appropriately. Soil and groundwater conditions through this area have been preliminarily evaluated in the SDEIS (see *Southeast Issaquah Bypass Earth Technical Report*, October 2, 1998).

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New cuts in the steep slope area must be designed to: 1) replace the lateral support of the slope by the use of structural retaining walls, and 2) provide a path for flow of groundwater that is present within the native soils. New fills in the steep slope area need to be 1) evaluated for overall stability, and 2) designed such that it is constructed on a series of horizontal benches to "key" the fill into the slope. Geologic and hydrogeologic design considerations will require additional subsurface exploration to supplement the test borings completed to date for the SDEIS. Additional subsurface exploration will need to be completed before designing structural walls for the SE Bypass project, since subsurface conditions change significantly over relatively short distances. A design level subsurface exploration program can be developed to adequately address the geotechnical and hydrogeological design considerations at the north end of the SE Bypass project area as a basis for structural wall design.

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10. The SDEIS identifies potential impacts on trails and access to Tiger Mountain and additional information on these impacts under is provided in Chapter 3 of this Final EIS. It has been acknowledged that the proposed SE Bypass roadway would change the route to reach trails on Tiger Mountain. The proposed project has been designed to accommodate future trail access and hiking opportunities near Issaquah. Modified Alternative 5 would continue to include an enlarged sidewalk, 14 feet in width, to accommodate trail use along the western side of the proposed roadway. A 5-foot bicycle lane also would be provided along both sides of the roadway. Signalized crosswalks would be included connecting to a standard sidewalk on the east side of the roadway which would provide access to existing Tiger Mountain trails. A new trailhead parking area south of East Sunset Way is also proposed to provide vehicle access to trails in the north. While the hiking environment would change along the roadway, access to hiking trails on Tiger Mountain would be continued.

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A pedestrian crossing was considered near the high school athletic field during early design meetings on the proposed project build alternatives. A potential overpass raised clearance issues for vehicle movement along the roadway. The Issaquah School District expressed concerns for loitering and other issues associated with the potential provision of a tunnel undercrossing at this location.


lapse to fail to include some separation between kids on bikes and fast moving traffic. Equally important, over-crossings must be planned to ensure safe transport of recreational users across the bypass.

**Issue #8:** Wildlife considerations and protections are inadequate. The SDEIS hardly addresses wildlife issues at all yet each week the Issaquah Press is full of stories of bears, cougars, and other wildlife sighted within the city. The bypass will become a major killing zone for the significant numbers of wildlife that migrate into the city from Tradition Plateau. How is this to be addressed and mitigated?

**Issue #9:** Surface water runoff and groundwater infiltration issues are inadequately addressed. A bypass would add a massive amount of new impervious surface to an area now covered primarily by forest. As the City has learned repeatedly (e.g. Sunset Way detention ponds), man-made retention/detention/infiltration facilities rarely work as planned and the negative consequences are severe. The SDEIS doesn't provide an adequate plan for capturing, containing, and infiltrating into the deep aquifer under Issaquah all of the surface water runoff it will create. How will this be addressed? Will the engineering design firm or construction firm be bonded and held accountable financially if these planned facilities fail to work as designed?

Even if it were to provide the supposed traffic relief that supporters wish for, IATC remains deeply opposed to the bypass for all of the negative impacts it will cause to the city, its citizens, and the environment. But, IATC strongly believes that any traffic benefits would be marginal and short-lived at best. The worst of all cases would be to build such a permanently damaging roadway, at such great cost (dollars, character, quality of life, environment, and more), AND to have it fail to alleviate traffic in any meaningful way for any meaningful amount of time. IATC sadly believes that is what the current proposal would do. We urge a much more thorough evaluation and analysis by City officials of the issues identified above and a NO decision on the proposed bypass.

Yours truly,



Doug Simpson  
President



Ken Konigsmark  
VP, Advocacy



Steve Drew  
VP, Advocacy

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To date, no further consideration has been given to provisions for grade-separated crossings and the proposed project continues to provide at-grade crosswalks for east-west pedestrian and bicycle travel. Alternatives that would have used the South C alignment, where a free right turn to the SE Bypass was proposed near the Rainier Trail, would need to accommodate pedestrian movement in the design.

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11. and 12. The proposed sidewalks on both sides of the roadway would be separated from traffic by curbs and a five-foot wide bicycle lane. Landscaping is proposed along the inside portion of sidewalks, but is not currently planned between the outer portion of the sidewalk and the road. As indicated above, a grade-separated crossing was considered, but is not proposed, along the roadway.

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13. The City recognizes that more needs to be understood regarding the migration patterns of large mammals between Tiger and Squak Mountains. Therefore, in the Concurrence Point 3 Package (the agreement between the proponents and the resource agencies on the preferred alternative and compensatory mitigation) the City has agreed to participate monetarily to help initiate a study and planning effort to address regional wildlife connectivity. The City has also agreed to facilitate a discussion during the project design stage with WSDOT through an inter-agency request to evaluate maintenance needs at the existing wildlife crossings on I-90 in coordination with WDFW and USFWS.

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14. The FEIS assumes a "base scenario" for stormwater effects that reflects much less infiltration of runoff from the project site. Attachment C (Revised Stormwater Analysis) to the Concurrence Point 3 Packet presents a detailed discussion and calculations of hydrologic impacts for this base case scenario, as well as an "alternate scenario" wherein much more project site runoff is assumed to infiltrate at North Pond N-1 (near the I-90 Sunset Interchange) and at South Pond S-1. The project design would focus on maximizing runoff infiltration, and would include extensive in situ explorations at proposed pond sites to confirm realistic infiltration rates to use in pond design. The FEIS includes more discussion than was presented in the DSEIS about potential effects on streamflow and aquifer recharge in acknowledgment of the importance of this comment.

15. Your comments have been noted and will be considered in the City's decision for this project.



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JUL 28 2004

PUBLIC WORKS ENG.

July 28, 2004

Mr. Bob Brock  
Public Works Director  
P.O. Box 1307  
Issaquah, WA 98027

**SUBJECT: RIVER & STREAMS BOARD COMMENT LETTER  
ON THE SE ISSAQUAH BYPASS SDEIS**

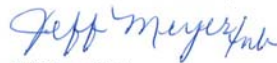
Dear Mr. Brock:

The City of Issaquah River & Streams Board (R&S) has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the SE Issaquah Bypass and the Board has prepared the attached comments on the adequacy, accuracy and completeness of the SDEIS document. The Board focused their review and comments on elements of the SDEIS that are related to water resources, consistent with the stated duties and responsibilities of the River & Streams Board to "serve as a scientific and technical resource advisory body to the Mayor and City Council of actions necessary to protect, preserve and enhance the quality and quantity of aquatic environments within the City of Issaquah and the drainage basin surrounding the City."

The comments represent the consensus of all Board members. The River & Streams Board members would like to thank the Mayor and Public Works Engineering (PWE) for the opportunity to comment on the SDEIS.

If you have any questions or require additional information, please contact our Chairman, Jeff Meyer.

On behalf of the City of Issaquah  
RIVER & STREAMS BOARD,



Jeff Meyer, Chair

cc w/attachment: Honorable Mayor Ava Frisinger  
All R&S Board members  
Mark Hinthorne, Planning Director  
Peter Rosen, Environmental Planner

## River & Streams Board comment letter on SE Bypass SDEIS

### Table S-1 - Summary of Environmental Impacts and Mitigation Measures for Build Alternatives

1. Table S-1 does not address the No Action Alternative (Alternative 7) – The absence or reduced level of impacts resulting from a No Action Alternative should be noted and must be included for comparative purposes. Without an adequate comparison to the No Action Alternative, the magnitude of the impacts of the build alternatives is de-emphasized. Under the No Action Alternative, additional impervious surface coverage in the project area would not take place. The natural forest and soils would remain intact. There would be no impacts to the hydrologic system- surface or groundwaters, water quality, wetlands, wetland buffers, etc.

2. The summary table does not include the secondary and cumulative impacts from the body of the report. Many people only read the summary and the secondary and cumulative impacts are important to include.

### Chapter 2 - Alternatives

1. Page 2-1 – The second bullet states that the FHA criteria for the action would “have independent utility or independent significance, i.e. be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made.” The proposed action is not independent. Conversely, the proposed project is entirely dependent on the new Sunset Interchange. The Bypass would have had little or no utility without the recently configured Sunset Interchange. The old interchange did not have off and on ramps in all directions, particularly to the west to Seattle. This dependence was not adequately discussed or disclosed in the Bypass SDEIS, nor were the cumulative effects of this dependence on the new Sunset Interchange. Moreover, the modifications to the Sunset Interchange necessary to connect it to the Bypass should be included and discussed in the Bypass EIS. At present the Interchange is not configured to receive the Bypass.

2. The No Action Alternative should include options for utilizing and improving existing facilities, such as 2<sup>nd</sup> Avenue, Newport Way, Rainier Avenue, etc.

3. The River and Streams Board opposes all the SDEIS Alternatives with the south alignment following 6<sup>th</sup> Avenue SE (Alternatives 1, 3, and 5). This alignment would result in increased direct and indirect environmental impacts on flooding and the large wetland (Wetland GW).

### Geology and Soils:

1. In the SDEIS, it isn't clear that in the critical north section on the very steep hillside above E. Sunset Way, the grading cut will have to be large enough to allow 7 lanes of traffic (not 4) for the intersection turn lanes, with adequate turning radius allowances and gradual merge lanes, so that much of this section will have to be much wider than was depicted in the illustrated cross-sections (Figures 2-5, 2-6) provided. It is not clear how wide this cut will actually have to be and how far south the huge-tiered retaining walls will extend across the slopes of Tiger Mountain. The locations of the “typical” cross-sections along the road alignment should be identified.

2. The current ground surface of the intersection is approximately 50-70 vertical feet above the Sunset Interchange. The transition to tie the two interchanges together will require massive excavation, grading, and removal of soil and increase the chances of disrupting subsurface water. Little mention has been made in the SDEIS about dealing with probable interceptions of groundwater in the process of making this huge cut, nor about the importance of insuring adequate drainage from behind the retaining walls so that water pressure from intercepted groundwater doesn't jeopardize the integrity of the retaining walls.

1. Your comments have been noted and will be considered in the City's decision for this project.
2. Secondary and cumulative impacts are included in the Summary of this Final EIS.
3. Issues regarding the proposed SE Bypass and independent utility were identified in the SDEIS volume addressing comment letters on the Draft EIS. This response is repeated from the SDEIS text below:

“Through a series of meetings held in summer 1997, it was determined that each of the Issaquah area projects would have independent utility, and therefore, would be subject to separate environmental review. These meetings, attended by Issaquah, Washington State Department of Transportation, Federal Highway Administration, and project consultant team members, resulted in agreement that independent review should proceed (Position Paper on Segmentation, May 14, 1997; Meeting Notes with FHWA dated August 5 and September 9, 1997). This was determined to be true for all three Issaquah-area projects. The North SPAR project would exist even if the South SPAR project had not been built, and it would still serve the Issaquah Highlands development. The South SPAR project was considered dependent on the I-90 Sunset Interchange and that is why those two projects were linked in a single environmental impact statement. The South SPAR/Sunset Interchange project, however, was not considered dependent on construction of the Southeast Issaquah Bypass or the North SPAR project. Finally, the Southeast Issaquah Bypass is not considered dependent on either of the SPAR projects, nor the I-90 Sunset Interchange Improvements. “Since issuance of the Southeast Bypass Draft EIS, both the North SPAR and South SPAR/Sunset Interchange projects have been completed and are serving local traffic needs as intended. Therefore, even if the proposed Southeast Bypass project is not constructed, these two projects will continue to function as designed (page xi, SDEIS Comment Letters, June 2004).”

The proposed SE Bypass project's northern limits would end south of the I-90 Interchange and may require modification of the East Sunset Way intersection. The potential for a new t-intersection at East Sunset Way has been considered in environmental analysis for the proposed SE Bypass project. This intersection was identified and described in the Draft EIS (2000) and again in the Supplemental Draft EIS (2004) and continues to be a part of the proposed project.

The I-90 interchange will need to be rebuilt whether or not the bypass is done; reconfigured if the bypass is not built and reconfigured to accommodate the bypass if it is built.

4. Mitigation measures are considered for the No Action alternative in the SDEIS. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but these alternatives are not reasonable because they are not effective in reducing congestion.
5. With mitigation, no adverse impacts on the floodplain are expected under Modified Alternative 5. Please see Chapter 3 of this Final EIS for impacts related to hydrology and floodplains. Modified Alternative 5 would include changes in the proposed project's southern alignment to avoid or reduce wetland impacts. Potential wetland impacts under this alternative cannot be fully avoided, however, and a wetland mitigation plan has been prepared and is included with this Final EIS.

6. The typical cross-section provided in the SDEIS depicts an area south of East Sunset Way and is used for illustrative purposes only. The proposed retaining wall on the east side of the roadway could extend approximately 1,000 feet south from a point opposite East Sunset Way in the northern project area. Additional subsurface exploration would be needed at the design stage of the proposed project to confirm the design of structural walls in the north.

There was no mention that a perched aquifer was intercepted in the process of installing fiber optic cables in this area, although they briefly mentioned intercepted groundwater seeps in the development of the Fred Meyer-Home Depot shopping center. Where would this drainage go?

3. The SDEIS only touched on the possibility of intercepting groundwater in the form of perched aquifers and indicated that site-specific geotechnical studies would be required to ensure the stability of the cut and fill on the steep slopes in the north. It is not clear when in the process these studies would be done.

4. It is not clear whether the drainage from intercepted groundwater is taken into account in the calculation of the storm events that the North Pond 1 would be able to handle, and if so, how was a prediction made of the volume of the water likely to be intercepted?

#### Hydrologic Systems

##### **Groundwater**

1. SDEIS does not adequately address the impacts to groundwater from the build alternatives. Given the problems we recently experienced on Issaquah Highlands, and on Talus a few years ago, the geologic and subsurface and interflow are not adequately studied in the SDEIS.

The "White Paper" on Issaquah Highlands stormwater infiltration acknowledged that the subsurface geology of the western portion of Issaquah Highlands is far more complex than was revealed in the Grand Ridge EIS. The Bypass will traverse similar terrain.

2. The excavation into the northwest side of Tiger Mountain for the bypass will expose many vertical feet of subsurface materials. The SDEIS indicates that these materials are well-drained and would not cause problems from seepage. This situation is especially relevant at the proposed Bypass-Sunset Way intersection. This interchange is very near the spot that a fiber optic installation punctured an aquifer several years ago. Moreover, a stream is approximately 100 yards or less from the Bypass construction area. The current ground surface of the intersection is approximately 50-70 vertical feet above the Sunset Interchange. The transition to tie the two interchanges together will require massive excavation, grading, and removal of soil and increase the chances of disrupting subsurface water.

3. Page 4-36 refers to artesian wells and other wells in the area. It would be helpful to know the locations. The location of an artesian well can provide clues about the underlying geologic structure and hydrology.

##### **Stormwater/infiltration/aquifer**

1. Page 4-43, third bullet – This bullet states runoff from the pedestrian trail and sidewalks in the northern part would sheet flow away from the roadway and soak into the ground in the permeable native soils, but the cross sections indicate the widest walkway on the east would be above fill soil, and this could cause a problem with water collecting behind the big lower retaining wall.

2. The SDEIS stresses the importance of checking the ability of the proposed infiltration ponds to infiltrate prior to selecting the preferred alternative, yet all alternatives in the north have the same pond locations, and no alternate locations are proposed if one or more of the sites are unable to infiltrate at the expected rate. A misjudgment in terms of volume of intercepted groundwater or infiltration rate can result in the system being overwhelmed and turbid, untreated water being released into the East Fork of Issaquah Creek.

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7. The project has included detailed analysis of existing surface and subsurface hydrologic conditions in the project area. It is acknowledged that large retaining walls proposed in the northern project corridor would intercept shallow ground water on the affected hill slope area. These effects are discussed in Attachment C to the City's Concurrence Point 3 Packet and in the FEIS. The walls would be designed and constructed with careful protection to avoid hill slope failure as a primary consideration. Additional design level subsurface exploration would be needed before designing the proposed structural walls in the northern project area.

9

8. Subsurface soil and groundwater conditions vary greatly in the project vicinity and it is not possible to compare other local events with the proposed SE Bypass project area. Additional subsurface explorations would be needed at the design stage prior to building structural walls in the north project area. Based on available boring data, groundwater seepage is not expected to be of concern within the proposed cuts. In particular, conditions that were encountered locally a few years ago by a telecommunications company are not expected along the SE Bypass route. In that event, a contractor was using directional drilling equipment in the area of the Sunset Interchange. They drilled in an easterly direction at about elevation 140 ft for a distance of about 250 to 300 ft into the hillside when the drill crew encountered groundwater under pressure, causing water to flow out of the borehole until it could be capped permanently. This drilling activity tapped the groundwater at a location east of the proposed alignment and at a depth of about 50 feet below the planned roadway elevations. The SE Bypass route would be at an elevation of about 190 feet in the vicinity of the proposed retaining walls, which is 50 feet higher than the previous boring. Geologic investigations have not found anything that would suggest a similar condition would be encountered in the SE Bypass area.

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9. The FEIS assumes a "base scenario" for stormwater effects that reflects much less infiltration of runoff from the project site. Attachment C to the City's Concurrence Point 3 Packet presents a detailed discussion and calculations of hydrologic impacts for this scenario, and an "alternate scenario" where more project site runoff is assumed to infiltrate at North Pond N-1 and South Pond S-1. The project design would focus on maximizing runoff infiltration, and would include extensive on-site explorations at proposed pond sites to confirm the infiltration potential for pond design. Please see Chapter 4 of the FEIS for additional discussion about potential effects on streamflow, surface water quality, and aquifer recharge.

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10. Your comments are noted. Please see response to comment 8 above regarding subsurface conditions in the project vicinity.

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11. Information on water wells in the project vicinity, including a map of well locations, is provided in the *Southeast Issaquah Bypass Waterways and Hydrologic Systems Technical Report* (Herrera, 1998) prepared in support of the *Southeast Issaquah Bypass Draft Environmental Impact Statement* issued in June 2000.

13

12. Infiltration rates of existing soils to absorb sidewalk runoff will be evaluated during final design. In the event that soils in the vicinity prove not to have sufficient infiltration capacity, any runoff from sidewalks will be conveyed to North Pond 1 for detention and treatment.

13. The variability and hence unreliability of infiltration in the project area has been acknowledged. To this end, all ponds shown in the FEIS, except North Pond 2, are designed and sized on the basis of zero infiltration. North Pond 2 is assumed to infiltrate stormwater given favorable soils documented in studies for the proposed Park Pointe development nearby.

3. North Pond 1 would be very close to the stormwater ponds built by WSDOT for the infiltration of stormwater from the Sunset Interchange. Engineers thought that these ponds would be more than adequate to infiltrate stormwater runoff, yet they way-overestimated their infiltration capability and have had to discharge turbid water into the East Fork of Issaquah Creek.

4. South Pond C-1 and South Pond C-2 are located very close and, in the case of C-1, within the buffer of a wetland. How can one expect to be able to infiltrate so close to a wetland? The water table is high in this area. According to the King County standard cited on p. 4-72, there has to be at least a 5-foot separation between the bottom of the infiltration pond and the seasonally high groundwater level. Wouldn't that indicate that there would likely be minimal ability to infiltrate and a lack of filtration of contaminants before the road runoff moves into the wetland system and is discharged into the Issaquah Creek tributaries?

5. Page 4-53 states: "The proposed infiltration facilities for the northern portion of the Southeast Issaquah Bypass would completely mitigate the potential hydrologic impacts" of the build alternatives on the groundwater aquifer and on East Fork Issaquah Creek. These bold statements are unwarranted and misleading. On the same page it states in bold "additional soil and infiltration rate testing should be performed at all proposed infiltration pond sites to confirm conditions prior to selection of a preferred alternative." How can the SDEIS state the infiltration facilities would "completely mitigate" impacts when the same page states further testing is necessary to confirm the feasibility of infiltration? It seems that there would be a number of scenarios in which the aquifer could be impacted; less water would be able to be infiltrated than before construction, and turbid stormwater would have to be discharged into the East Fork. What are the plans and impacts if infiltration facilities are not feasible or don't have capacity for sufficient infiltration?

6. Page 4-53 states: "The proposed detention facilities for the southern portion of the SE Bypass would mitigate potential substantial adverse impacts of Alternatives 1 through 6 on the North Tributary to Issaquah Creek. On p 4-59 there is an explanation that "because runoff will be detained and discharged into receiving waters at predevelopment rates, the risk of adverse impacts on the floodplain from stormwater runoff is extremely low." The stormwater detention facility would add significant volumes of stormwater (even if released at pre-development rates) at higher temperatures than existing flows. Prolonged flow peaks are known to have detrimental impacts on stream systems. There is already flooding below the wetland; the addition of more water to a relatively small tributary is likely to cause erosion and sedimentation. How could the detention facility be considered "mitigation" when it would actually result in impacts to the North Tributary?

#### Water Quality:

1. Page 4-65 notes that forest practice buffer widths of 25 feet "are not adequate to perform the primary function of trapping sediment" and "erosion of exposed soils and transport of sediments directly into small stream channels was the major water quality problem observed..." (in forest management areas), yet the primary mitigation for loss of buffer in a Class 1 wetland (GW) is proposed to be enhancement, not buffer averaging, so the buffer loss would be permanent. Best Available Science information on wetland buffers indicates that enhancement of buffers does not adequately compensate for buffer width reductions if the buffer width is greatly reduced. Enhancement with plantings is often temporary, as invasive species often take over and nullify the effect of the enhancement even if there is follow-up maintenance for 5 years.

2. Table 4-13 on p 4-70 indicates that the All-Build alternatives would result in total net loading that has substantially higher chemical oxygen demand (COD), total suspended solids (TSS), heavy metals (zinc, copper), nitrates (NO3, NO2), and total phosphates (TP) to local groundwater and Issaquah Creek.

In the event that during final design the soils prove conducive for infiltration, the proposed ponds would be downsized according to the requirements of the most current edition of the Department of Ecology's *Stormwater Management Manual for Western Washington*. To address the issue of turbid water during construction, the bottom 2 feet of pond excavation would not occur until the project has been completed and the site stabilized to prevent potential "clogging" of the soil pores. After site stabilization, small silty soil particles would be removed and un-compacted native soil used to maximize infiltration potential.

13 14. and 15. The variability and unreliability of infiltration in the project area has been acknowledged. All ponds shown in the FEIS, except North Pond 2, are designed and sized on the basis of zero infiltration. North Pond 2 is assumed to infiltrate stormwater given favorable soils documented in studies for the proposed Park Pointe project nearby. In the event that during final design soils in the SE Bypass project area prove conducive for infiltration, the proposed ponds would be downsized according to the requirements of the most current Department of Ecology *Stormwater Management Manual for Western Washington*.

15 16. Under design requirements of the Department of Ecology *Stormwater Management Manual for Western Washington*, not only would peak flows be matched for the SE Bypass project, but flow durations may not be exceeded for 1/2 of the 2-year storm through the 50-year storm. The detention facilities proposed for this project would meet this requirement. Attachment C (Revised Stormwater Analysis) to the Concurrence Point 3 Packet presents a detailed discussion of potential hydrologic effects on the north tributary to Issaquah Creek, including the potential for erosion and sedimentation of the stream channel. This analysis is referenced in the FEIS discussion in the Hydrologic Systems section of Chapter 4. The stormwater detention provided in South Pond S-1 and South Pond S-3 would mitigate for what would otherwise clearly be significant adverse impacts on this small stream. Thus, to state that these ponds would cause impacts on the stream channel is incorrect. Potential temperature effects on the north tributary are a concern that should be addressed in the design of South Pond S-1 and South Pond S-3 (which would include permanent pools of water for runoff treatment) - mainly to maximize shading of the ponds to reduce water temperatures. The continual ground water seepage that feeds the north tributary will provide a temperature buffering effect for the long-term.

16 17. As described in the FEIS and the Conceptual Mitigation Plan, all wetland buffers within the project area and the mitigation site will be 110 feet wide. Mitigation for permanent buffer impacts will be buffer addition. If the new buffer area is not of equal or greater value to the impacted buffer area, enhancement will also occur. Please see the FEIS and Conceptual Mitigation Plan for more detail.

17 18. Attachment C (Revised Stormwater Analysis) to the Concurrence Point 3 Packet presents a detailed discussion of revised pollutant loading calculations for Modified Alternative 5 (the preferred alternative discussed in the FEIS), as well as revised assumptions for stormwater infiltration and surface drainage discharges. The plans for stormwater treatment associated with this alternative, coupled with a commitment to install a sanitary sewer system to replace failing septic systems in parts of the neighborhood to the west of the southern portion of the project corridor, are expected to offset potentially adverse water quality effects on the north tributary (Lewis Lane Tributary) and Issaquah Creek and Lake Sammamish downstream.

However, the column for average pollutant concentration in surface runoff indicates pollutants would be slightly less in comparing the Build alternatives to No Action. The SDEIS is basing this analysis on high infiltration rates in the north end. This is unproven and uncertain, so the conclusions are misleading.

3. The SDEIS states that the size-restricted north infiltration pond can be expected to handle only a 4-year flood event, probably not accounting for any intercepted groundwater, yet the summaries of the effect of pollutants in road runoff minimize this and indicate that the pollutants "would be present at very low concentrations and would not pose a threat to groundwater quality." Is there really enough evidence at this time to be able to say this?

4. The calculation of the number of hazardous material spills seems to be based on the number of vehicles and the number of miles of roadway, yielding an estimated incidence rate of every 22 years for the north portion and every 35 years for the south portion of the bypass in the alternative with the greatest roadway length. In actuality, the risk is probably much higher in all Build alternatives, but especially in Alternatives 2, 4 and 6 due to the curves in the roadway, the speed some vehicles may go, and the fact that the curves may hide lines of cars waiting at bottlenecks, such as waiting to get onto the Issaquah-Hobart Road. It is also not clear in the cross sections what the height of the retaining walls above the roadway will be (compare the design for the 2-lane vs. 4-lane road), and whether it would be enough to prevent tanker trucks from going over the wall in the event of a collision. The two accidents in recent years on I-90 near the Issaquah exits as the result of backups indicate that this type of accident can occur more often in certain circumstances.

5. Page 4-73 advises the minimization of the use of pesticides in landscaping maintenance, yet municipalities often find it impractical to use mechanical means, especially on steep hillsides, to control non-native invasive plants along the right-of-way in between planted vegetation. Advisories on West Nile disease call for the use of larvicides in stormwater conveyances. How could these pesticides be prevented from entering the groundwater which becomes Issaquah's drinking water?

#### Wetlands

1. Page 4-76 - Wetlands were delineated in June-December 1997, more than 6 years ago. City code limits the validity of wetland reports to 2 years. Moreover, there is no indication in the SDEIS, or in Appendix D, or the DEIS, that the wetland boundaries were ever verified by the U.S. Corps of Engineers or other agency. Corps wetland verifications are typically valid for only 5 years. A field review by the R & S Board revealed that a few remaining wetland boundary flags were clearly hanging inside wetland areas. It is unclear if the SDEIS adequately presents current wetland boundaries.

2. Page 4-75 - The wetland classification was based on 1995 City Code. According to the City's Critical Area Regulations, Section 18.10.590.D, wetlands that are hydrologically connected to each other "shall be added together to determine" the category of wetland. In addition, Section 18.10.590.C states that "wetlands that fall into more than one class shall be considered to be a wetland of the higher numerical class." According to page 4-77: Wetland HS is "hydrologically connected to Wetland GW" via a culvert. Therefore, Wetland HS should be rated a Class 1 wetland (the classification stated for Wetland GW), rather than the Class 2 wetland as defined in the SDEIS. Table 4-14 (p.4-78) inadequately portrays the classification and buffer for Wetland HS. Wetland HS should be a Class 1 wetland with a 100-foot buffer and a corresponding wetland and buffer mitigation ratio. This class change will require additional mitigation for project impacts.

3. Construction impacts to Wetland HS are not addressed. Construction of the retaining walls and footings will necessitate additional clearing of vegetation and likely additional fill.

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19. See response to comment #18 above. There is sufficient evidence in the body of water quality literature for western Washington to support an assessment that pollutant loading occurring during the middle and latter part of extreme storm events is minimal compared to what occurs at all other times of lower flow and lighter precipitation, and thus it is reasonable to state that occasional infiltration pond overflows in heavy storm events should not result in measurable downstream water quality impacts, provided that the drainage conveyance system downstream of the infiltration facility is designed and maintained to resist significant erosion.

20. Comment noted. The discussion of mitigation measures for accidental spills has been expanded in Chapter 3 of this FEIS. The City also recently prepared a Spill Contingency Management Plan to address coordination of interagency actions and necessary response measures in situations of hazardous material spills.

21. The proposed ponds would be designed to allow fluctuations in water levels that would prevent mosquito eggs from hatching, therefore the use of larvicides is not expected to be needed. However, a larvicide is being used by the City consistent with the approved Department of Health strategy to mitigate potential mosquito-borne health issues associated with the West Nile Virus. This larvicide (Bti) is a natural bacterium that is considered safe by the Department of Ecology. If applied to surface waters, there is no chance that it will enter the groundwater drinking water aquifer because natural attenuation by subsurface soils will very effectively remove any contaminants.

The City currently does not employ herbicides for clearing brush from stormwater detention pond tracts and along road rights-of-way. Only mechanical removal methods are used. Vegetation maintenance on other city properties follow Integrated Pest Management Policy approved by the City. This will include use vegetation that requires minimal maintenance and no chemical treatment.

22. The four wetlands delineated in the area of South A in 1997 were re-examined in the field by Herrera in 2005. The boundaries of each of the wetlands were confirmed, with the exception of an adjustment to Wetland VL, and the addition of an upland inclusion in Wetland GW. The Hope wetland was also delineated during these 2005 site visits. Please see FEIS for more information. The wetland delineations will be verified by the Corps during the 404 permitting process.

23. The City of Issaquah wetland ratings for Wetlands HS and VL were changed from Class 2 (in the SDEIS) to Class 1. These wetlands are hydrologically connected to Wetland GW (Class 1), and therefore to the Hope Property Wetland and Wetland RD. The City of Issaquah Municipal Code requires 100-foot buffers for wetlands of this classification, and 2-to-1 mitigation ratios for permanent wetland impacts. The Department of Ecology's guidelines for a 110 foot wetland buffer are being followed.

24. The LEDPA, Alternative 5/Modified Alternative 5, involves the South A alignment, which does not propose impacts to Wetland HS.

4. Page 4-93 - In the section on compensatory buffer mitigation for the South C alignment, the mitigation for 1.39 acres of permanent impact to wetland buffers caused by impervious roads and stormwater ponds is proposed to be only 1.87 acres of enhancement. Included in this proposed buffer enhancement would be the removal of part of a paved road. Returning a paved road into a functioning buffer area would seem to be difficult to achieve. This enhancement proposal doesn't seem adequate for the damage caused, which is permanent loss of wetland buffer. There is a net loss of buffer area. City code requires buffer averaging to be used, adding an equal area to prevent loss of total buffer area. Enhancement of the buffer habitat is required, in addition to providing buffer area equal to the impacted buffer area.

5. The SDEIS makes no mention of compensation for collateral damage, such as blowdowns in the wetlands or buffers, due to buffer reductions opening them up to winds that they are normally protected from. Compensation for tree blowdowns should be at least on the order of the 1:2 or 1:3 standard as required at Issaquah Highlands, depending on the size of the tree blown down.

#### Vegetation & Wildlife:

1. Page 4-104 states: "The majority of impacts on vegetation and wildlife that would result from the Southeast Issaquah Bypass would not be of great consequence, because most of this habitat is highly disturbed and of relatively low quality." How the writers of the SDEIS came to this conclusion is puzzling. True, the area of the railroad grade has some non-native invasive vegetation, but it is adjacent to the Tiger Mountain natural resource conservation area which has fairly good habitat. The wildlife species which migrate across this area to move to other woodland sanctuaries have become accustomed to such minor disturbances as hikers. A study done on Tiger Mountain indicated that animals such as cougars often were feet away from hikers who passed by them without noticing them. The vegetation, native or not, provides cover, and a way to move to other areas unmolested at night or even in the middle of the day. The SE Bypass, however, would impose a formidable barrier to the migration of wildlife. In addition to the pavement, the speeding vehicles, the retaining walls, and the fencing, construction activities would strip all the cover-providing vegetation from a wide swath of the hillside. In addition, windthrow is likely to fell large trees beyond the clearing limits. Some of the cleared vegetation is proposed to be replaced with native vegetation, but it will take years before dense cover is established. These impacts need to be re-evaluated and addressed.

2. Page 4-105 states that in the southern portion of the project area, "wildlife currently moves relatively freely between the forested slopes of the West Tiger Mountain/Tradition Plateau NRCA to the east and adjacent residential areas to the west." Yet on page 4-87, it is stated that the wetland buffer boundaries would be fenced. Even fences that are designed to allow passage of deer can be one more deterrent (in addition to the proposed Bypass) in the prevention of wildlife migration from Tiger Mountain to the Issaquah Creek corridor and Squak Mountain. Prevention of migration can lead to local extinction of wildlife populations.

3. Two wildlife crossings are proposed for Alternatives 3 and 4, yet only 1 for the other Alternatives. Why? In deciding the location of the crossings, was the location of the Sportsman's Club's rifle range taken into account?

#### Secondary and Cumulative Impacts

1. The cumulative effects of the North Spar, South Spar, and Sunset Interchange relative to the Bypass were not adequately addressed in the SEIS. The Bypass will make it much easier for people who live on the Plateau to commute to Maple Valley, Auburn, Kent, and South King County.

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25. Under Modified Alternative 5, the South C alignment is not the preferred alignment in the Final EIS. All buffer impacts associated with the project will be mitigated under Mitigation Option 1 or 2.

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26. Modified Alternative 5 does not propose buffer reductions. All wetlands in the project area and mitigation site will be protected by a 110-foot buffer. The areas of temporary buffer or wetland impacts associated with the bridge will be restored with native plantings.

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27. The project is located in a transition area between vast areas of public lands with valuable wildlife habitat and urban development. This area provides edge habitat and supports wildlife with small home ranges, wildlife adapted to edge habitats, and wildlife that forage in urban settings. It is not suitable habitat for species with large home ranges or species requiring extensive intact forested habitat. For those species, this area is primarily a potential corridor to other intact forested habitat associated with Squak Mountain State Park. For the species that thrive in the current project area, a new road corridor would present a substantial impact if it isolates those populations from foraging sources (urban neighborhoods). These effects were disclosed on page 3-105 of the SDEIS. Some of these effects would be offset by the wildlife corridor at the North Tributary and Wetland GW. Many of the affected species are highly adaptable and they will find alternative foraging areas, travel routes, or move on to better habitat. It is important to note that this road corridor is directly adjacent to the urban boundaries of Issaquah. The total project effect is a loss of 26 acres of habitat, which is a relatively minor amount of habitat. The loss of this habitat and the construction of a road would not have a substantial impact on forest-dwelling species. The best movement areas for those species appear to be further south in the Issaquah-Hobart Road corridor.

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28. The wetland buffers would be fenced temporarily so newly planted vegetation has time to establish. In our experience, fencing is critical to the survival of plantings, because the young plants are a preferred food source for wildlife. The text in the FEIS has been revised for clarification.

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29. The preferred alternative proposes a wildlife crossing at the North Tributary. Numerous factors were considered during the discussion of wildlife crossing for the project. In the Concurrence Point 3 Package (*the agreement between the proponents and the resource agencies on the preferred alternative and compensatory mitigation*) the City has agreed to participate monetarily to help initiate a study and planning effort to address regional wildlife connectivity. The City has also agreed to facilitate a discussion during the project design stage with WSDOT through an inter-agency request to evaluate maintenance needs at the existing wildlife crossings on I-90 in coordination with WDFW and USFWS.

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2. Moreover, the cumulative effects of the Bypass on the rural lands south of the project were not adequately discussed. Particularly, the Issaquah-Hobart Road will get increased use which will make the road less safe, and in turn increase the need to widen and improve the road. There are many wetlands and streams along this road that feed Issaquah Creek. Impacts to those aquatic resources will degrade Issaquah Creek.

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30.-31. Cumulative impacts south of the city are addressed in the land use discussion of the SDEIS and this Final EIS. Please see response to Comment No. 30 above. As indicated in both the SDEIS and this Final EIS, the need for future improvements to Issaquah-Hobart Road will be determined by King County. Presently, the County has not proposed additional widening of the Issaquah-Hobart Road. Potential effects of future projects south of the Issaquah Southeast Bypass on streams and wetlands in the Issaquah Creek valley are speculative. The FEIS includes additional discussion of potential secondary and cumulative effects of the project on aquatic resources as well as other elements of the environment.



DEDICATED TO



## Issaquah Sportsmen Club

P. O. BOX 88

PHONE EX.2-3311

ISSAQUAH, WASH. 98027

Bob Brock, Public Works Director  
City of Issaquah Public Works Department  
1775 12<sup>th</sup> Ave. N. W.  
Issaquah, WA 98027

RECEIVED  
JUN 24 2004  
PUBLIC WORKS ENG.

Comments-Southeast Issaquah Bypass—Draft Supplemental EIS & Section 4 (f) Evaluation June 2004

Dear Mr. Brock:

The Issaquah Sportsmen's Club has the following comments;

### Access to Sportsmen's Club properties--- Alternatives 1 through 6

Access shall be via IMPROVED DEDICATED PUBLIC STREET RIGHT OF WAYS or by land acquisition by the city and improved by the City and deeded fee ownership to the Sportsmen's Club. Such access shall be equal in type/width (or greater to meet current city codes) as the current city rights of way (S. E. Evans & 6<sup>th</sup> Ave. S. E.)

Comments such as *Access by Park Point Development* are not appropriate as the Park Point project may not be constructed or may not be constructed with timing to match the bypass. Further, Park Point is private land and private land owners are under no obligation to provide access to other private properties.

In addition the Sportsmen's Club has had to relocate our access 4 times in the past when private land has exchanged hands and roads and easements were eliminated and/or we had to pay for construction of new access roads on city right of way.

### Utility Relocation

Water—The City of Issaquah provides both domestic and fire protection water to Club's properties.

The Clubhouse receives its domestic water via a club owned service line connected to a city metered water service connection at the southwest corner of the clubhouse property. A city owned fire line and fire hydrant are located in an easement granted to the City by the Sportsman's Club along the south line of the Clubhouse property.

The Shooting Range and House receive domestic water via a City owned meter and service line terminating near the Puget Sound Energy owned light pole in front of the Club owned house. Said City service line was constructed by the City and angles across School owned land (former city land) from the City Gun Club Well Site.

Continued water service is essential to our operations—any and all necessary re-locations shall be at project expense. NOTE: Club owned water lines with the exception of the short line to the house at the range were constructed using IAC-FARR supported funding, as was the fire hydrant and fire line at the clubhouse.

Electric Power and Street Light—Overhead and underground provided by Puget Sound Energy

Page 1 of 3

AFFILIATED WITH THE NATIONAL RIFLE ASSOCIATION

1

1. Under Modified Alternative 5, access to the Sportsman's Club property would be either by a public street through the Park Pointe Development should that be built or directly from the Bypass..

2

2. Your comments have been noted and will be considered in the City's decision for this project. Utility connections will need to be maintained and will be included in the design as part of the project.

3

3. Your comments have been noted and will be considered in the City's decision for this project. Utility connections will need to be maintained and will be included in the design as part of the project.



in PSE Easements in SE Evans Street & 6<sup>th</sup> Ave. SE. We assume any relocation of PSE owned facilities would be consistent with PSE/City agreements, but any relocation of Club owned facilities would be a project expense. Note Club owned portions of underground services to Clubhouse & Shooting Range were constructed using IAC-FARR supported funding.

3

Telephone and Communications Lines—Overhead and underground provided by QWEST and SPRINT in easements in SE Evans Street & 6<sup>th</sup> Ave. SE. We assume any relocation of QWEST or SPRINT owned facilities would be consistent with QWEST & SPRINT/City agreements, but any relocation of Club owned facilities would be at project expense. Note: Club owned underground services to Clubhouse & Shooting Range were constructed using IAC-FARR supported funding.

4

4. Your comments have been noted and will be considered in the City's decision for this project. Utility connections will need to be maintained and will be included in the design as part of the project.

Septic Systems and Storm Water Systems—. Any relocation or replacement of these systems would be at the expense of the City as these are required by King County and are parts of our facilities in King County.  
Note: Septic and Storm water systems on both club properties were constructed using IAC-FARR supported funding.

5

5. Your comments have been noted and will be considered in the City's decision for this project. Utility connections will need to be maintained and will be included in the design as part of the project.

Historic Properties—Issaquah Sportsmen's Clubhouse was identified as eligible for National Historic Register Designation numerous times in the draft and on the maps, this is incorrect.

The CLUBHOUSE BUILDING AND LAND were entered in the National Register of Historic Places on November 19, 1998.

In addition the CLUBHOUSE BUILDING AND LAND were listed in the Washington Heritage Register, September 25, 1998.

And the CLUBHOUSE was designated a King County Landmark August 22, 1997.

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6. Thank you. The CP3 document notes that the Clubhouse is on the National Register of Historic Places and is also noted in the FEIS as well.

Land Acquisition—Specific Mitigation has not been identified for acquisition and replacement of Sportsmen's Club properties—See May 16<sup>th</sup> 2003 letter from State of Washington, Office of the Interagency Committee to Doug Mattoon from Darrell Jennings.

Section 4(f) Mitigation pages 5-25 & 5-25 Issaquah Sportsmen's Clubhouse

A number of things listed have already been done by either the Issaquah Historical Society, Mountain to Sound Greenway or the Sportsmen's Club or are impossible to accomplish.

Completed items include History of the Issaquah Sportsmen's Club 1921 to 1998 includes clubhouse histories, walking tours and brochures of historic Issaquah, Historic Property inventories, numerous interpretive signs, History of Gilman Water System, History of the Issaquah Lumber Company, and currently nearing completion The transportation history of

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7. The City has selected alignment North C in the Preferred Alternative to avoid the Issaquah Sportsmen Club building, thus removing this potential impact. In addition a new access road would be provided to the Clubhouse property.

Issaquah, from Canoe to SUV. Also See the Issaquah Historical Society Web Site for many other history items ([issaquahhistory.org](http://issaquahhistory.org)).

7

Relocating the Clubhouse and Range to a new Location within King County or for that matter any other county or jurisdiction is impossible due to zoning and other permitting requirements.

Sincerely,



Tom Mechler  
Director & Club Agent

Cc: Darrell Jennings  
Project Manager  
State of Washington  
Office of the Interagency Committee

DEDICATED TO



## Issaquah Sportsmen Club

P. O. BOX 88

PHONE EX.2-3311

ISSAQUAH, WASH. 98027

July 15, 2004

Bob Brock, Public Works Director  
City of Issaquah Public Works Department  
1775 12<sup>th</sup> Ave. NW  
Issaquah, WA 98027

Comments-Southeast Issaquah Bypass---Draft EIS June 2004

Dear Mr. Brock:

The Issaquah Sportsmen's Club has the following additional comments;

Rangemaster's house---Alternatives 1 through 6:

House is not shown on Figures S-1, S-2, S-3, S-4, S-5, S-6, S-7, and S-8.

It appears as though alternative 3 and 4 would displace this house and this would add another house to your house displacement numbers.

Proposed Wildlife Crossings Alternatives 3 through 6:

Alternatives 3 and 4---Figures S-4 and S-5 show crossings directly onto the Club shooting Range.

Alternatives 5 and 6---Figures S-6 and S-7 show crossing into the fenced-in clubhouse property.

These crossings should not connect to fenced in (secured) Club properties.

Sincerely,

Tom Mechler  
Director and Club Agent

Cc: Darrell Jennings

Project Manager

State of Washington

Office of the Interagency Committee

AFFILIATED WITH THE NATIONAL RIFLE ASSOCIATION

1

1. The City has selected alignment North C in the Preferred Alternative to avoid the Issaquah Sportsmen Club building, thus removing this potential impact. In addition a new access road would be provided to the Clubhouse property.

2

2. The wildlife crossing near the Issaquah Sportsman's Club has been eliminated because existing fencing on private property in the area would make this crossing ineffective. Recognizing that more needs to be understood regarding the migration patterns of the large mammals between Tiger and Squak Mountains, the City agreed during the CP3 issue resolution process to participate monetarily and help initiate a study and planning effort that addresses regional wildlife connectivity.

Janet M Wall  
22740 SE 56<sup>th</sup> St.  
Issaquah, WA 98029

July 30, 2004

Mr. Bob Brock  
Public Works Director  
P.O. Box 1307  
Issaquah, WA 98027

**RE: Personal comments on the SE Issaquah Bypass SDEIS**

Dear Mr. Brock:

As a member of the City of Issaquah River & Streams Board, I fully support the comments of the Board, submitted by chair Jeff Meyer. As an individual resident and concerned citizen of the City of Issaquah, I am taking this opportunity to emphasize certain points and with a little less formality. Most of my comments are concerned with water issues, primarily at the north end of the proposed bypass, where all 6 build alternatives have the same alignment, but I am adding a few notes on other issues.

Issaquah city leaders will soon have to make important decisions regarding the Bypass, and it is important for these decision-makers to be fully informed about the potential risks and natural resource damage that would be undertaken should they decide to proceed with this proposed highway crossing Issaquah's recharge area. Once the Bypass is built, Issaquah would be changed forever, and there is no going back.

Thank you for this opportunity to comment on the SDEIS.

If you have any questions, you can contact me at 425-392-5506.

Sincerely,

  
Janet M. Wall

cc w/attachment:

Honorable Mayor Ava Frisinger  
All City of Issaquah Council Members  
King County Executive, Ron Sims

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JUL 30 2004

PUBLIC WORKS ENG.

**Table S-1-Summary of Environmental Impacts:**

Many people will only have time to evaluate the summary table, not read the whole SDEIS, yet many of the potential impacts of the bypass, including the secondary and cumulative impacts mentioned in the report are left out of the summary table.

**Alternatives:**

The SDEIS does not evaluate a valid alternative—that of using a fraction of the cost of the SE Bypass to widen and improve the western bypass of SR 900 and Newport Way; widen and improve the eastern bypass of Sunset Way and 2<sup>nd</sup> Avenue; synchronize the traffic lights; and provide another route under I-90 from Gilman Avenue.

**Geology and Soils:**

It has not been made clear to the casual reader that Phase 1 of the highway construction would do nearly as much damage as Phase 2 in the north end of the proposed bypass because all of the clearing and grading and the erection of the retaining walls would be done in preparation of the 4-lane highway. (The main difference in Phase 2 would be the increased amount of the impervious surface of the road bed itself and the provision of additional drainage to convey the runoff on the east side of the road.)

In the SDEIS, it isn't clear that in this critical north section on the very steep hillside above E. Sunset Way, the cut will have to be large enough to allow 7 lanes of traffic (not 4) for the intersection turn lanes, with adequate turning radius allowances and gradual merge lanes, so that much of this section will have to be much wider than was depicted in the illustrated cross-sections provided. It is not clear how wide this cut will actually have to be and how far south the huge-tiered retaining walls will extend across the slopes of Tiger Mountain. In addition to clarifying this, it would be helpful to have a cross-section of this 7 lane area.

**Groundwater/Hydrology/Stormwater/Infiltration:**

Little mention has been made in the SDEIS about dealing with probable interceptions of ground water in the process of making this huge cut, nor about the importance of insuring adequate drainage from behind the retaining walls so that water pressure from intercepted ground water doesn't jeopardize the integrity of the retaining walls that would hover like dams above the center of town.

If I could emphasize one sentence: **Never underestimate the power of water or overestimate the ability of present-day "experts" to predict what it is going to do.** We simply don't have the technology yet to know what pathway water will take as it percolates through complex glacial deposits—it often surprises us. I'm afraid Issaquah has had a poor track record on such projects. Time and time again we have been assured that no damage will occur, and time and time again water has overwhelmed the storm

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1. Your comments have been noted and will be considered for the FEIS. The FEIS contains a considerable amount, which all cannot be summarized in the summary table.

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2. Alternative alignments for the EIS evaluation were selected in 1997, and a DEIS was issued in June, 2000. The alternatives you suggest have been considered, but rejected due to various reasons (See Chapter 2). Widening Newport Way was considered in the 1990's, but was rejected due to the significant cost of acquiring additional property and issues with adding traffic to largely residential street. Traffic signal coordination is currently being implemented, but probably cannot be expanded beyond the current program to be more effective. A new route under I-90 is currently under design (but not funded), but this project – the I-90 Undercrossing – won't provide any capacity improvements to the I-90 to Issaquah-Hobart corridor. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but are not reasonable because they are not effective in reducing congestion.

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3. Potential construction impacts from the proposed project are identified in Chapter 3 of the SDEIS and in this Final EIS. Mitigation measures are also identified in Chapter 3 to avoid adverse impacts during construction.

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4. Additional subsurface exploration would be needed at the design level for the proposed structural walls in the north project area. Subsurface geologic conditions vary widely in the proposed project area and it is not possible to compare conditions at nearby locations as being the same as those within the SE Bypass project area. The project has included detailed analysis of existing surface and subsurface hydrologic conditions in the project area. It is acknowledged that the large retaining walls proposed in the northern part of the project corridor would intercept shallow ground water on the affected hillslope area. These effects are discussed in Attachment C (Revised Stormwater Analysis) to the Concurrence Point 3 Packet and in the FEIS. The walls would be designed and constructed with careful protection to avoid hillslope failure as a primary consideration. Regarding the point about "...never underestimate the power of water..." please be assured that the City is committed to learning from the drainage problems that have occurred on other projects in recent years, and not downplaying the concerns that you raise. Your comments in this regard, and those of the Rivers & Streams Board, have been vital in focusing greater attention on surface and subsurface drainage issues for this project. These are serious issues that must be addressed for the bypass project to be successful. The analysis presented in the Concurrence Point 3 packet and in the FEIS demonstrates that the City is paying close attention to these issues.

water conveyances or gone another way, landslides have repeatedly occurred, and large quantities of sediment have entered our salmon streams.

Soon after I moved to Issaquah in 1995, I heard about the collapse of the huge retaining walls for the Sammamish Plateau Water and Sewer District's 297 water tank in the Overdale Park neighborhood just above Albertson's on East Lake Sammamish Parkway, and incidentally right up the driveway from my house. The original contractor underestimated the amount of drainage needed from behind the retaining wall, and during the winter (of 1988-1989?), the huge wall came tumbling down, taking with it trees, telephone poles, underground utilities, and a tremendous amount of mud halfway down the slope. Many years later, dead trees and a lack of conifers still mark the path of the landslide.

Even with this warning, and with a series of exploratory borings, the builders of the Park Hill at Issaquah apartments on that same hillside encountered much more groundwater than expected while building the 13-foot retaining walls behind the apartments and had to retroactively add additional drainage. The builders of the retaining wall at the Fred Meyer-Home Depot intercepted groundwater seeps. Problems with predicting where water is going to go have plagued the Issaquah Highland infiltration system since its inception, causing the engineers to abandon one system after the other, trying to infiltrate stormwater and recharge the Lower Issaquah Valley Aquifer without causing unstable slopes. Twice, landslides/creek blowouts have resulted. Talus has also had problems with stormwater, underestimating the amount of extra runoff produced during construction and causing flooding of septic tanks of residents lower on the hillside. The proposed SE Bypass-Sunset Interchange intersection would be dug into the hillside very close to the location that a fiber optic installation intercepted a perched water table.

Given all of these previous problems with ground water in the same type of glacial deposits, one would think that the SDEIS would devote considerable discussion to handling the interception of ground water; its impact on the quantity of water flowing into the aquifer; insuring adequate drainage behind the retention walls; and the feasibility of handling all of this water in the proposed infiltration ponds, yet it does not. A hillside that appears dry during the construction of a project in the summer can lead the engineers into underestimating the amount of drainage needed behind the retention walls, with disastrous consequences even years later.

A related issue is the infiltration of the runoff: the SDEIS stresses several times in bold type the importance of checking the ability of the proposed infiltration ponds to infiltrate prior to selecting the preferred alternative. I understand that infiltration testing cannot properly be done in the summer time when the water table is low, yet the alternative is due to be chosen by early fall. All alternatives in the north have the same proposed pond locations, and no alternate locations are proposed if one or more of the sites are unable to infiltrate at the expected rate. A misjudgment in terms of volume of intercepted groundwater or infiltration rate can result in the system being overwhelmed and turbid, untreated water being released into the East Fork of Issaquah Creek.

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4. Cont'd (See above response)

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5. The FEIS assumes a "base scenario" for stormwater effects that reflects much less infiltration of runoff from the project site. Attachment C (Revised Stormwater Analysis) to the Concurrence Point 3 Packet presents a detailed discussion and calculations of hydrologic impacts for this base scenario, as well as an "alternate scenario" wherein much more project site runoff is assumed to infiltrate at North Pond N-1 (near the I-90 Sunset Interchange) and at South Pond S-1. The project design would focus on maximizing runoff infiltration, and would include extensive in situ explorations at proposed pond sites to confirm realistic infiltration rates to use in pond design. The FEIS includes more discussion than was presented in the DSEIS about potential effects on streamflow, surface water quality, and aquifer recharge in acknowledgment of the importance of this comment.

WSDOT has had just such problems with the infiltration rate of the Sunset Interchange runoff in the infiltration pond across the street from the proposed North Pond 1, leading to turbid water discharges into the East Fork. The SDEIS estimates that the North Pond 1 would only be able to handle the runoff from a 4-year storm (which is pretty minimal), and this is without accounting for drainage from behind the retaining walls due to intercepted ground water.

#### **Water Quality:**

Issaquah's SE Bypass would traverse some of the best of the remaining recharge area for Issaquah's aquifer. The potential for damaging this resource through interception of groundwater flows; lack of proper filtration of sediments/pollutants during construction; and through accidents on the finished roadway do not seem to be adequately addressed for what is at risk.

The calculation of the number of hazardous material spills seems to be based on the number of vehicles and the number of miles of roadway, yielding an estimated incidence rate of every 22 years for the north portion and every 35 years for the south portion of the bypass. The SDEIS did not address the fact that other factors besides distance can increase the risk of a spill. The risk is thus probably much higher, especially in Alternatives 2, 4, and 6 due to the curves in the roadway, the speed some vehicles may go, iciness in winter, and the fact that the curves may hide lines of cars waiting at bottlenecks, such as waiting to get onto the Issaquah Hobart road. The two tanker accidents in recent years on I-90 near the Issaquah exits as the result of backups indicate that this type of accident can occur more often in certain circumstances.

In the event of a hazardous material spill in the north end that escapes the collection system, the SDEIS estimates that in only 5 years the pollution would reach the city's wells. Much is at stake here, and it is important not to underestimate the amount of risk that is involved, yet this fact is glossed over in the summary tables.

#### **Wetlands:**

As the Rivers & Streams Board letter points out, according to the Issaquah code, wetland HS should be classified as a Class 1 wetland, not a Class 2, with a corresponding 100-foot buffer and a wetland mitigation ratio. Impacts to the wetland and buffers thus need to be reevaluated. Only buffer enhancement was proposed in mitigation for placing a storm water pond in a wetland buffer. City code requires buffer averaging to be used, adding an equal area to prevent loss of total buffer area. Enhancement of reduced buffer area is required in addition to providing additional buffer area equal to the encroached-upon buffer area.

#### **Vegetation and Wildlife:**

The SDEIS states on p. 4-104, "The majority of impacts on vegetation and wildlife that would result from the Southeast Issaquah Bypass would not be of great consequence,

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6. See response to comments #4 and #5 above

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7. See response to comments #4 and #5 above

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8. Comment noted. The discussion of mitigation measures for accidental spills has been expanded considerably in the FEIS.

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9. The wetlands have been re-evaluated as one wetland assessment unit under both the City and Ecology rating systems. Wetlands GW, VL, HS, RD, and Hope Property are categorized as Class 1 under the City rating and Category II under Ecology rating. Ecology recommends a 110-buffer for wetlands of this type. The conceptual mitigation plan has been revised to make up for impacts to wetland classified as such. Ecology mitigation standards are being proposed, which exceed City standards. Permanent buffer impacts associated with the storm pond are not proposed.

because most of this habitat is highly disturbed and of relatively low quality.” How the writers of the SDEIS came to this conclusion is puzzling. True, the area of the railroad grade has some non-native invasive vegetation, but it is adjacent to the Tiger Mountain natural resource conservation area which has fairly good habitat. The wildlife species which migrate across this area to move to other woodland sanctuaries have become accustomed to such minor disturbances as hikers. A study done on Tiger Mountain indicated that animals such as cougars often were feet away from hikers who passed by them without noticing them. The vegetation, native or not, provides cover, and a way to move to other areas unmolested at night or even in the middle of the day. The SE Bypass, however, would impose a formidable barrier to the migration of wildlife. In addition to the pavement, the speeding vehicles, the retaining walls, and the fencing, construction activities would strip all the cover-providing vegetation from a wide swath of the hillside. In addition, windthrow is likely to fell large trees beyond the clearing limits. Some of the cleared vegetation is proposed to be replaced with native vegetation, but it will take years before dense cover is established. These impacts need to be reevaluated and addressed.

#### Views from I-90:

Will the fabulous view of Tiger Mountain from I-90 be forever marred by the sight of SE Bypass retaining walls, roadway, traffic lights, street lights, probable erosion problems, expected windthrow, Park Pointe, and other developments? As I return home from Seattle, my heart lifts as I come up that last rise and the beautiful sight of Tiger Mountain comes into view in front of me—a lovely view of unbroken conifer trees reaching toward the sky. It helps to compensate for the ugly gashes that have disfigured Grand Ridge due to Issaquah Highlands and the extended gravel pit. Yet the SDEIS does not even mention how this view will change, let alone provide computer-altered photos of what it would look like.

#### Cost Estimates:

Factor in additional stormwater conveyances/and or groundwater infiltration systems to handle intercepted ground water from behind the retaining walls; add in additional mitigation for the Class 1 wetland impacts and wetland buffer replacement and enhancement; do computer-altered photos of what the visual impacts of the bypass will be; and address other inadequacies of the SDEIS, and the monetary costs of the SE Bypass will soar above present estimates. It may be possible to come up with a fair estimate of the projected costs in today's dollars.

What will be more difficult is to come up with a fair assessment of the risks that Issaquah would be taking to the quantity/quality of water going into the aquifer; the chance of landslides due to unpredictability of water in glacial till hillsides; the impact the barrier of the roadside/retaining walls/loss of vegetation cover will have on migrating wildlife; the effects on endangered salmon; and the cumulative effects on each of those elements due to additional development on this hillside, made feasible because of the bypass.

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10. Recognizing that more needs to be understood regarding the migration patterns of the large mammals between Tiger and Squak Mountains, the City agreed during the CP3 issue resolution process to participate monetarily and help initiate a study and planning effort that addresses regional wildlife connectivity. The City also agreed to facilitate a discussion during the project design stage with WSDOT through an inter-agency request to evaluate maintenance needs at existing wildlife crossing on I-90 in coordination with WDFW and USFWS. The project is located in a transition area between vast areas of public lands with valuable wildlife habitat and urban development. This area provides edge habitat and supports wildlife with small home ranges, wildlife adapted to edge habitats, and wildlife that forage in urban settings. It is not suitable habitat for species with large home ranges or species requiring extensive intact forested habitat. For those species, this area is primarily a potential corridor to other intact forested habitat associated with Squak Mountain State Park. For the species that thrive in the current project area, a new road corridor would present a substantial impact if it isolates those populations from foraging sources (urban neighborhoods). These effects are disclosed on page 4-105 of the SDEIS. Some of these effects would be offset by the wildlife corridor at the North Tributary and Wetland GW. Many of the affected species are highly adaptable and they will find alternative foraging areas, travel routes, or move on to better habitat. It is important to note that this road corridor is directly adjacent to the urban boundaries of Issaquah. The total project effect is a loss of 26 acres of habitat, which is a relatively minor amount of habitat. The loss of this habitat and the construction of a road would not have a substantial impact on forest-dwelling species. The best movement areas for those species appear to be further south in the Issaquah-Hobart Road corridor.

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11. The proposed project's northern limits would be approximately 450 feet south of the interstate and proposed retaining walls would be located approximately 650 feet south of the interstate. Portions of the proposed roadway may be visible from the interstate, however, views would be limited by topography, distance, and travel speeds on the interstate. Proposed landscaping is expected to help diminish view impacts associated with the proposed project.

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12. Your comments are noted and will be considered in the City's decision on the project. The estimated cost of the project is based on pre-design information available when the EIS was written, and will likely escalate in future years to reflect the regional construction climate.



RECEIVED BY ALL  
COUNCIL MEMBERS

*Clerk*  
CITY CLERK'S OFFICE  
AUG 13 2004  
RECEIVED  
Jim and Kathryn Sapienza  
1480 Hillside Drive SE  
Issaquah, WA 98027  
425-427-9629

August 11, 2004

TO:

City of Issaquah Mayor Ava Frisinger  
City Council Chair Nancy Davidson  
Council Member Fred Butler  
Council Member Bill Conley  
Council Member Joe Forkner  
Council Member Russell Joe  
Council Member Dave Kappler  
Council Member Hank Thomas  
Editors of the Issaquah Press

RE: DSEIS comments for SE Bypass Project

We ask you to review and strongly consider the comments in the enclosed letter written by Issaquah and Sycamore neighborhood resident, Jeffery S. Jones, PWS. Mr. Jones' constructs a lucid series of concerns from his perspective as a wildlife biologist and resident of our city, and concludes with a logical summary regarding the SE Bypass Project.

Mr. Jones' July 23, 2004 letter was submitted to Mr. Bob Brock, Public Works Director, with over 40 supporting signatures before the July 30, 2004 deadline for DSEIS comments. The letter is included for your review with over 50 signatures -- representative of a strong majority of the perspective on the project shared by the residents of the Sycamore neighborhood of Issaquah.

Sincerely,

*Jim Sapienza & Kathryn Sapienza*  
Jim and Kathryn Sapienza

July 23, 2004

Mr. Bob Brock  
Public Works Director  
City of Issaquah  
P.O. Box 1307  
Issaquah, Washington 98027

RECEIVED  
JUL 30 2004  
PUBLIC WORKS ENG.

RE: Comment on Draft Supplemental EIS, Southeast Issaquah Bypass

Dear Mr. Brock:

After a brief review of documents at the library, I have the following comments and concerns:

Wetlands

Herrera incorrectly separated the wetlands, shown in Figure 4-14 of the Draft Supplemental EIS, into four separate systems. The identified wetlands HS, GW, VL and RD are part of one wetland system. They are hydrologically connected by culverts, surface ditches and subsurface flow. Existing roads and the abandoned railroad grade were used to divide these into separate systems. These wetlands should not be considered separate systems. A surface hydrologic connection or overlapping buffers with a subsurface connection makes the wetland functionally one system. Another way of making a connectivity decision is to assess whether or not impacts to one area of wetland will have a hydrologic affect on the rest of the system. The abandoned railroad grade between wetlands HS and GW is a temporary fixture, which prior to its construction was probably wetland and removal would re-create wetland. Wetland HS is fed by the same spring systems as wetland GW, VL and RD. Wetland HS almost certainly has a subsurface connection to wetland GW. Wetland HS is also a relatively short distance from the flood plain of Issaquah Creek and probably has a piped connection.

The wetland system of HS, GW, VL and RD has a direct hydrologic connection to wetlands west of Issaquah-Hobart Road and wetlands adjacent to and feeding Issaquah Creek. Issaquah Creek is habitat for endangered species. Therefore, the entire wetland system is a Class 1 wetland, as defined by City of Issaquah code. The wetland is larger than the combined area of the identified wetlands because it includes wetlands adjacent to Issaquah Creek. It contains three or more classes of wetlands, using the USFWS Cowardin classification scheme, i.e. at least Palustrine forested (PFO), Palustrine scrub-shrub (PSS), and Palustrine emergent (PEM). Wetlands larger than 10 acres with three or more classes of wetland also meet the definition of Class 1 wetlands. The city code further requires Class 1 wetlands to have 100-foot buffers and a 2:1 mitigation exchange ratio.

The EIS does not adequately mitigate for wetland buffer impacts. Mitigation for buffer impacts should be replacement of equal area with enhancement for all buffer areas that

1. The wetland ratings have been adjusted to meet the standards in Ecology's *Washington State Wetland Rating System for Western Washington* (Hruby 2004). Because Wetlands GW, VL, HS, and RD all have surface connections but are bisected by human-made features, they were considered to be one assessment unit. The wetland unit received a rating of Category II. Please refer to the FEIS for more information. The rating forms were attached to the Appendix of the Conceptual Mitigation Plan (Issaquah 2005). A piped connection from Wetland HS to Issaquah Creek has not been found.

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2. The City of Issaquah wetland ratings for Wetlands HS and VL were changed from Class 2 (in the SDEIS) to Class 1. These wetlands are hydrologically connected to Wetland GW (Class 1), and therefore to the Hope Property Wetland (which may contain juvenile Chinook) and to Wetland RD. The City of Issaquah Municipal Code requires 100-foot buffers for wetlands of this classification, and 2-to-1 mitigation ratios for permanent wetland impacts.

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3. Mitigation for permanent buffer impacts will include buffer addition and enhancement, as described in the Conceptual Mitigation Plan. The mitigation site will be protected by a 110-foot buffer, consistent with the buffers for all of the wetlands in the project area. This buffer width exceeds the buffer widths required by the City of Issaquah for wetlands of this type.

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would benefit from enhancement. Vegetative enhancement in exchange for loss of buffer area will not fully compensate for permanent loss of buffer and should not be acceptable mitigation. The city code requires increased buffer widths for “wetlands within 25 feet of the toe of slopes equal to or greater than 30% but less than 40%”. The city code also requires increased buffer widths for issues not limited to: “critical drainage areas, location of hazardous materials, critical fish and wildlife habitat, landslide or erosion hazard areas adjacent to wetlands, groundwater recharge and discharge, and the location of trail or utility corridors”.

The functional assessment of the wetland is inadequate for evaluating either the existing condition or mitigation performance. I suggest using the Washington State Department of Ecology Wetland Functional Assessment methodology, which provides a comparative value for each function. The city code requires, “equal or greater biological values including habitat values, and with equivalent hydrological values including storage”.

#### Shorelines

The City of Issaquah Shoreline Management Program extends shoreline jurisdiction to Issaquah Creek and all associated wetlands. Wetland HS, GW, VL and RD are adjacent to Issaquah Creek and include a portion of the creek floodplain. Compliance with the Shoreline Management Program should be a requirement.

#### Endangered Species

The biological assessment does not address bull trout because distribution maps for this species were not completed at the time of the biological assessment. According to U.S. Fish and Wildlife guidance document, titled “*Biological Assessments and Section 7 of the Endangered Species Act*”, date Rev. May 2000, p-17, species should be assumed to be present if habitat is present and information about use is lacking. Bull trout should not have been ruled out of an effect determination. Attachment B and pages 24-27 of the above named document provide specific guidance for Section 7 Consultations on Bull Trout. This guidance was not followed.

The biological assessment determination for Chinook salmon is “may effect and is likely to effect”. There are only a small number of wild Chinook returning each year to Issaquah Creek. Any impact to the wild Chinook population or their habitat could result in loss of this species. Wild Chinook are used by the hatchery to help keep the hatchery stock genetically healthy. The preferred alternative includes a storm water infiltration pond west of Front Street adjacent to the creek floodplain. The additional water infiltrating will alter the hydrology of the creek, diverting some of the existing wetland flows and increasing groundwater flows to the creek below this infiltration pond. There may be changes to the creek channel both downstream and upstream due an increase in stream flow and changes to the hydroperiod, below the infiltration pond. Stream systems have a balance between erosion and deposition which is directly affected by flow rates. Increasing the flow downstream will change the hydrologic gradient and velocity, altering the balance of the stream and possibly damaging critical habitat. Section 7(a)(2) of the Endangered Species Act of 1973, requires that “any action authorized not jeopardize the continued existence of any listed species or result in the destruction or

3. Additional wetland mitigation is proposed for Modified Alternative 5; please see Chapter 3 in this Final EIS for more information.

4. The Washington State Department of Ecology Wetland Functional Assessment was used to evaluate the functions and values of the wetlands on the site. Please see Wetland Mitigation Plan for more information.

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5. The wetlands that would be affected by the Southeast Issaquah Bypass project are all outside of the riparian corridor of Issaquah Creek, and are thus not subject to Shoreline Management requirements. Some of the project area wetlands are associated with smaller streams that are not under the jurisdiction of the Shoreline Management Act. If mitigation site option #2 is pursued at Squak Valley Park, construction of the mitigation site could be subject to the City’s Shoreline Management regulations.

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6. A new Biological Assessment has been prepared for issuance with this FEIS. Bull trout is included. Also see the threatened and endangered species and fisheries sections in Chapter 3 of this FEIS for additional information on bull trout.

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7. The biological assessment (BA) entitled *Southeast Issaquah Bypass – Interstate 90 to Front Street South, Biological Assessment* (2004). The BA addresses the effects of the Southeast Issaquah Bypass project on candidate species and species listed as threatened or endangered under the Endangered Species Act (ESA) of 1973. The 2004 draft BA found the project will not adversely affect any ESA species or other significant biological resources since they either 1) do not exist in the project area, 2) are not affected by the project location or 3) will be protected by the project mitigation measures. These findings have been confirmed for Alternative 5 by a review by the City’s consultants Herrera Environmental Consultants. A copy of their findings is provided as Attachment A of the CP3 Report. Agency concurrence on the Final BA will be included in the published FEIS.

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adverse modification of habitat of such species which has been designated as critical (critical habitat)". Issaquah Creek is designated as critical habitat for Chinook salmon. Not only will the stream hydrology and channel be altered, the water quality will be adversely impacted by an increase in pollutants, such as PCB's from automobile exhaust. The conclusion of the biological assessment for Chinook is "may effect and is likely to effect". A determination of "may effect and is likely to effect" means that the project should not be implemented. Only an alternative with a determination of "no effect" or "may effect but not likely to adversely impact" should be used. In the case of Chinook salmon in Issaquah Creek, any "direct or indirect effects" to the species or critical habitat should not be allowed. If the project were to be constructed, a very high level of channel, flow and water quality monitoring would be necessary for the protection of the species. Corrective measure may be necessary if impacts occur. The need for and cost of such studies and corrective measures were not included in the analysis of alternatives.

#### Wildlife

The draft EIS does not fully evaluate the impacts to wildlife due to loss of habitat and the physical barrier created by the roadway and concrete walls. The proposed high concrete retaining walls would be an impassable physical barrier to many species of wildlife. These potential impacts raise a number of questions. How and to what extent will the alternatives result in fragmentation of wildlife habitat? How many and what species will be displaced? What mitigation is necessary for wildlife impacts?

Wildlife mortality from automobiles is also a concern. Where are existing large mammal trails located? What is the likelihood of medium and large mammals crossing and wandering onto the roadway? Won't a recessed roadway tend to trap wildlife? How many and what kinds of automobile accidents can be expected, due to wildlife?

Even though the draft EIS recognizes impacts to wildlife will occur, little mitigation for these impacts is proposed. Mitigation for wildlife impacts should include measures such as reestablishment of native plant communities on the side slopes of the roadway, several large bridging underpasses for wildlife movement, replacement of habitat features impacted, and purchase and restoration of additional habitat areas nearby.

#### View & Noise in the Sycamore Neighborhood

The draft EIS neglects information on view and noise impacts to the Sycamore neighborhood. The Sycamore neighborhood looks across the valley at the proposed bypass. Other residents and I are concerned that our views may be adversely affected and there may be an increase in traffic noise. Visual schematics of the change in view for the Sycamore neighborhood should be included in the draft EIS, in order for residents to comment on this issue. Data comparing the existing to potential noise levels are also needed.

#### Traffic Safety

The draft EIS does not fully address traffic hazards, particularly for schools, pedestrians and bicycles. The increased traffic exiting the south end of the bypass may be a hazard for children attending Clark Elementary, the middle school and high school. The

8. The BA found that the Southeast Issaquah Bypass project may affect, but is not likely to adversely affect Puget Sound Chinook salmon.

9. The project is located in a transition area between vast areas of public lands with valuable wildlife habitat and urban development. This area provides edge habitat and supports wildlife with small home ranges, wildlife adapted to edge habitats, and wildlife that forage in urban settings. It is not suitable habitat for species with large home ranges or species requiring extensive intact forested habitat. For those species, this area is primarily a potential corridor to other intact forested habitat associated with Squak Mountain State Park. For the species that thrive in the current project area, a new road corridor would present a substantial impact if it isolates those populations from foraging sources (urban neighborhoods). These effects are disclosed on page 4-105 of the SDEIS. Some of these effects would be offset by the wildlife corridor at the North Tributary and Wetland GW. Many of the affected species are highly adaptable and they will find alternative foraging areas, travel routes, or move on to better habitat.

10. It is difficult to predict the level of mortality that will occur on the roadway although the SDEIS acknowledges this may occur. Where the roadway is confined by retaining walls, little mortality of wildlife is expected because they could not access the corridor. Where the roadway crosses at-grade, wildlife could suffer mortality, however, a wildlife crossing is included in this area. Also, some wildlife will simply not attempt to cross the corridor given the anticipated volume of traffic for the opening year of the project (an average daily traffic volume of 31,000 vehicles). The preferred alternative would not provide a recessed road corridor.

11. On page 4-106 of the SDEIS under the discussion of "Mitigation Common to All Build Alternatives," it states "clearing of vegetation in the project area would be reduced to the extent possible to preserve existing habitat and notable trees. The right of way would be landscaped with native plantings that provide cover as well as nesting and foraging habitat for native wildlife. Snags would be created in areas adjacent to the project area to benefit woodpeckers and other cavity-nesting birds that may be affected by the loss of snag priority habitats." Additionally, in the Concurrence Point 3 Package (the agreement between the proponents and the resource agencies on the preferred alternative and compensatory mitigation) the city has agreed to participate monetarily to help initiate a study and planning effort to address regional wildlife connectivity. The City has also agreed to facilitate a discussion during the project design stage with WSDOT through an inter-agency request to evaluate maintenance needs at the existing wildlife crossings on I-90 in coordination with WDFW and USFWS.

12. The receptor nearest to the Sycamore Neighborhood was Receptor Q in the SDEIS. Receptor Q was found to have noise measurements that were below the noise abatement criteria for all of the proposed alternatives. The DSEIS visual analysis followed appropriate federal and state procedures, and was reviewed and approved by FHWA and WSDOT prior to issuance of the SDEIS.

13. At receptor Q, noise levels were predicted to increase 3 dBA as compared to existing conditions. A 1 to 3 dBA increase is barely perceptible to most individuals.

14. The proposed project would include traffic signals, and pedestrian and bicycle facilities intended to allow safe non-motorized travel in the project area.

preferred alternative has a turn in the road from all directions, at the intersection of Front Street and 2<sup>nd</sup> Avenue. Cars may make the turn and then not see the light at the end of the bypass and cause serious accidents at the intersection. These turns reduce site distance necessary for drivers to see light changes, pedestrians and avoid accidents. Cars are more likely to run off the road on a curve. Pedestrian walkways should be protected from traffic and bike lanes located off the road shoulder. A location for police patrol car presence should also be incorporated into the design near the intersection, since traffic must change speeds and the intersection is a school zone. Flashing school zone lights should be installed before the intersection and at other appropriate locations.

#### Air Quality at Schools

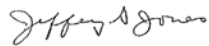
The draft EIS indicates that air quality within 300 meters will be adversely affected. However, no measures are proposed to correct air quality or to insure compliance with state and federal standards. Issaquah High School and Clark Elementary are within 300 meters of the proposed bypass roadway.

If the project cannot meet state and federal air quality then it should be abandoned. If the project is constructed, long-term air quality monitoring should be performed to insure that the health of the community and students are not compromised.

#### Alternative Analysis

The alternative analysis did not include an evaluation of other road improvements that cumulatively have already caused a noticeable reduction in traffic on Front Street. This missing alternative was repeated mentioned at the public hearing. I believe that this alternative should be added to the draft EIS and a new analysis and selection of the preferred alternative be performed. Impacts in the draft EIS are either left out, or incorrectly or not fully addressed. As discussed above, the wetlands were incorrectly rated and buffer sizes are wrong. Wetland and wetland buffer mitigation does not comply with city code. Wildlife impacts and mitigation are not fully addressed or mitigated. View and noise impacts for the Sycamore neighborhood are left out. Hydrologic impacts to Issaquah Creek are not addressed. Water quality impacts caused by pollutants not removed by bioswales or soil filtration aren't discussed. Bull trout are incorrectly excluded from study. The biological assessment concludes "may effect and is likely to effect" Chinook salmon, which means the project will not comply with the Endangered Species Act. Traffic safety particularly relating to schools is absent. And, safe air quality standards cannot be met. Unless the draft EIS can insure public safety, protection of endangered species and compliance with city code, the preferred alternative should be no action.

Sincerely,



Jeffery S. Jones, PWS  
1505 Hillside Drive S.E.  
Sycamore, Washington 98027

15. In the DSEIS, it was stated that during construction fugitive dust in the form of particulate matter (PM<sub>10</sub>) would be noticeable in uncontrolled to residences within 300 feet. Mitigation measures for construction activities are proposed in the SDEIS and included in Chapter 4 of this FEIS.

16. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. These other alternatives are not reasonable because they are not effective in reducing congestion. The reference to the "other road improvements that cumulatively have already caused a noticeable reduction in traffic on Front Street" is not clear, because no improvement have been made to Front Street for many years and conditions in the project vicinity have not changed.

17. Your concerns are noted and taken seriously in the ongoing project analyses and planning. Since the time the DSEIS was published, the wetland delineations in the project area have been refreshed, the wetlands re-rated per current Washington Department of Ecology guidelines, and the wetland impacts and mitigation have been re-assessed to current City and State standards in the Concurrence Point 3 packet and in the FEIS. The revised stormwater management analysis presented in the Concurrence Point 3 packet and summarized in the FEIS addresses the hydrology and water quality concerns noted in this comment. The revised biological assessment, based on the commitments to conservation measures for protection of threatened and endangered species included in Modified Alternative 5 (the City's preferred alternative), concludes that the effect on Chinook salmon, bull trout, and steelhead is "may affect not likely to adversely affect" these species. The proposed project is not expected to result in exceedances of Air Quality standards. As indicated above, traffic signals and pedestrian and bicycle facilities would be provided for safe non-motorized travel along the proposed roadway.

Residents of the Sycamore Neighborhood  
In support of the comments composed by Jeffery S. Jones:

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Signature	Print Name	Address
<i>Kathryn L. Sapienza</i>	KATHRYN L. SAPIENZA	1480 Hillside Dr.
<i>Jim Sapienza</i>	JIM SAPIENZA	1490 Hillside Dr.
<i>Steve J. Dr. W.</i>	STEVE J. DR. W.	1434 Sycamore Is. Wa.
<i>Donna Misner</i>	DONNA MISNER	1430 Sycamore Dr SE ISS WA
<i>Charlotte L. Mander Jones</i>	Charlotte L. Mander Jones	1505 Hillside Dr. SE ISS WA
<i>STEVEN SNYDER</i>	STEVEN SNYDER	1515 HILLSIDE DR SE, ISS WA
<i>KARIN A. POOL NORBY</i>	KARIN A. POOL NORBY	1498 HILLSIDE DR SE, ISS WA
<i>PETER G. NOBIS</i>	PETER G. NOBIS	1498 HILLSIDE DR SE, ISS WA
<i>SUSAN LOMMERS</i>	SUSAN LOMMERS	1404 Hillside Dr SE ISS WA
<i>JERRY MIXON</i>	JERRY MIXON	1524 HILLSIDE DR SE, ISS WA
<i>JEFF BICE</i>	JEFF BICE	1534 HILLSIDE DR SE ISS WA
<i>CATHERINE J. PIERCE</i>	CATHERINE J. PIERCE	380 SE CRYSTAL CREEK CIR.
<i>J. M. SCHRETER</i>	J. M. SCHRETER	380 SE CRYSTAL CREEK CIR.
<i>Robert Whitbeck</i>	Robert Whitbeck	1534 Hillside Dr. SE ISS WA 98027
<i>Denise Whitbeck</i>	Denise Whitbeck	1534 Hillside Dr. SE ISS WA 98027
<i>Dick Ferrarini</i>	Dick Ferrarini	1571 Hillside Dr. SE ISS WA 98027
<i>Anna Ferrarini</i>	Anna Ferrarini	1571 Hillside Dr. SE ISS WA 98027
<i>Kathleen Drew</i>	Kathleen Drew	1434 Sycamore Dr SE ISS WA 98027
<i>GERALD W. KLEIN</i>	GERALD W. KLEIN	495 SE SYCAMORE LN, Iss. 98027
<i>GEDALD O'NEILL</i>	GEDALD O'NEILL	505 SE SYCAMORE LN
<i>Ryan Records</i>	Ryan Records	331 SE Crystal Creek Cir.
<i>Tracy J. Hinz</i>	Tracy J. Hinz	1490 Hillside Dr SE ISS WA 98027
<i>Erica Temp</i>	Erica Temp	371 SE Crystal Creek Cir 98027
<i>Sandra Agnew</i>	Sandra Agnew	1531 Hillside Dr SE
<i>Terence Agnew</i>	Terence Agnew	1531 Hillside Dr SE
<i>Debra McEnroy</i>	Debra McEnroy	475 SE Sycamore Lane
<i>STEVE ESTATE</i>	STEVE ESTATE	475 SE Sycamore Ln.
<i>LEWIS MCAVOY</i>	LEWIS MCAVOY	475 SE SYCAMORE LN.
<i>N.A. WERNER</i>	N.A. WERNER	361 SE CRYSTAL CREEK ISS
<i>DAITH WERNER</i>	DAITH WERNER	361 SE CRYSTAL CREEK Circle
<i>STEVE SORICH</i>	STEVE SORICH	321 SE CRYSTAL CREEK Circle 98027
<i>Emily Lea Reed</i>	Emily Lea Reed	356 SE Crystal Creek Cir 98027
<i>Mike Bates</i>	Mike Bates	440 SE Sycamore Ln 98027
<i>Cheryl Bates</i>	Cheryl Bates	440 SE Sycamore Ln 98027
<i>Hedi Fuhs</i>	Hedi Fuhs	1564 Hillside Dr SE 98027
<i>SUSAN SCHRETER</i>	SUSAN SCHRETER	381 Crystal Creek Circle 98027
<i>DAN SHOFE</i>	DAN SHOFE	381 Crystal Creek Circle 98027



Residents of the Sycamore Neighborhood  
In support of the comments composed by Jeffery S. Jones:

Signature	Print Name	Address
38. Beverly Huntman	BEVERLY HUNTMAN	158 Brookside Dr SE
39. Jean Sanborn	JEAN SANBORN	1730 Brookside Dr.
40. Gretchen L. Campbell	Gretchen L. Campbell	1750 Brookside Dr SE
41. Lora Schurten	Lora Schurten	1745 Brookside Dr SE
42. Nick Margard	Nick Margard	1581 Hillside Dr SE
43. Nick Margard	Nick Margard	1591 Sycamore Dr SE
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*"The need for the proposed project is the result of existing traffic volumes on city streets, and the necessity to increase mobility by reducing congestion and improving access to I-90. The purpose of the proposed project is to resolve these problems by reducing traffic volumes that are causing the two existing interchanges and the Front Street corridor, to be overburdened." (Purpose and Needs Statement, SDEIS 1-1)*

**Comments on SE Bypass SDEIS**

In reviewing NEPA regulations and guidelines, the FHWA interpretation of NEPA and the WSDOT interpretation of NEPA, I have found many components of the SE Bypass supplemental EIS that do not conform. There are two main categories that are of primary importance. The first is the NEPA directive that all reasonable routes be addressed. The second is the use/lack of use of the "Purpose and Needs" statement.

NEPA indicates that all reasonable routes are to be addressed including both special requests (like City Council's request for an expanded No-Build alternative) and a study of improvements to the existing system. The SE Bypass EIS does not discuss improvements to 2<sup>nd</sup> that would increase capacity, nor does it discuss whole system improvements. It also does not discuss the No-Build option in an equally detailed manner, including minor improvements as specified in the NEPA guidance documents.

The Purpose and Needs Statement is mandated to be the thematic statement for the report, yet the SE Bypass SDEIS has little discussion of how reduced traffic volumes would resolve the failures on the two existing interchanges and the entire Front St. corridor. Instead much of the document discusses reduction of cut through traffic on 2<sup>nd</sup>, an issue that is not included in the Purpose and Needs Statement. Further the SDEIS segments the Front Street corridor, highlighting areas of reduced volumes while excluding the failure at 2<sup>nd</sup> and Front St. South and increased congestion on Front St. North as a part of that corridor. The function of the SR 900 interchange is only peripherally mentioned, while the Purpose and Needs Statement requires that information as a prime indicator of the viability of the SE Bypass.

Given the flaws in its two most basic structural components this SDEIS cannot be brought to a final version without a very extensive rework of the document. It is not my primary intent to request more money to fix this SDEIS. This SDEIS is fatally flawed, both by its lack of study of reasonable options and lack of adherence to its own Purpose and Needs Statement. When the lack of both Front St traffic benefits (when the corridor is considered as a whole) and interchange benefits are considered, it becomes very clear that the SE Bypass project does not fulfill its Purpose and Need and the No-Build option should be chosen, ending the need for a rework of the SDEIS.

Unfortunately, this EIS process seems to have a life of its own, and it would be naive to assume, no matter how rationally, that the process will not continue to the FEIS. Thus I am including comments on inadequacies of the SDEIS, with a note that NEPA also allows for comments on the merits of the varying alignments. These will be included as seems pertinent, and I have every expectation of seeing these comments addressed in the FEIS.

**It is important for me to reiterate that I do not wish to see another dollar spent on this project.**

**General Comments:**

1. The SDEIS has little language that "requires" the described actions to be taken. "Would" and "should" are extensively used, terms that have no requirements attached. The PDF presentation of the files made a word search of the entire document difficult but after finding "would" in nearly every category, from the description of when infiltration information would be presented to City Council to whether neighborhood stormwater systems will ("would" was the term used) be improved, it became clear that a general request was in order. Please create

1. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but are not reasonable because they are not effective in reducing congestion.

Following this direction, where appropriate the DSEIS did contain additional information concerning impacts related to the No Action Alternative. As required, the No Action Alternative has identified mitigation measures for the potential option of not constructing the proposed roadway. In most instances, mitigation has not been required under this alternative because potential impacts associated with construction of the roadway would be prevented should the No Action Alternative be selected. If the City decides not to build the SE Bypass, future project-specific actions the City might propose to address traffic problems would require separate environmental review.

2. Traffic data for the proposed project indicate that Modified Alternative 5 would substantially improve operations for north-south travel conditions and accessibility to I-90 from Front Street and the proposed SE Bypass roadway. This would meet the proposed project purpose and need as identified in Chapter 1 of this FEIS. Several options were considered as alternatives to the proposed project and are identified in Chapter 2 of this FEIS.

3. The EIS uses the term "would" in identifying impacts or actions that take place in the future, if a particular measure is provided or pursued. Frequently the use of the word "will" requires a level of certainty that is not appropriate at the stage of project design when environmental review occurs. The use of "would" implies that an impact or action *would* occur if future actions such as permits and approvals are granted at a subsequent stage of development. This has become an acceptable convention in EIS preparation because, generally, the EIS itself is not intended to make commitments. Instead, agencies may use an EIS to identify mitigation measures as conditions of approval for permits, which, because of their nature as enforceable documents, require such commitments.



a section within each area delineating required actions clearly. This must include only those actions using "shall", "will", and "must" concepts.

2. The expanded No-Build option, as requested after the DEIS, should have been provided in the SDEIS. How is this going to be addressed?
3. There is no discussion of how any of the "build" options fulfill the Purpose and Needs Statement. In reviewing the traffic models, it seems that none of the alternatives fulfill the requirements of this statement. Traffic with the SE Bypass, using the information in the SDEIS (pg 2-19), reduces failures on Front St. from south of Gilman to Clark Street. Conversely the Front St. corridor south of 2<sup>nd</sup> shows that corridor failing (pg 2-22). This failure (pg 2-23) is due to capacity constraints of Issaquah/Hobart. Also, Front Street north of I-90 and the I-90 ramps is shown to operate the same or worse with the SE Bypass. So, while some parts of Front Street improve, an equal area will stay the same or get worse. This will cause the Front Street corridor to continue to be over-burdened thus failing to meet the purpose of reducing traffic volumes.  
  
Similarly, pages 45 & 62 of the technical report both indicate that traffic is very similar on the 900 interchange whether the Bypass is built or not, causing the interchange to continue to be overburdened thus failing to meet the purpose of reducing traffic volumes.
4. NEPA has a very clear Cost/Benefit analysis section that encourages a discussion weighing the inevitable impacts of a project with the expected improvements. This analysis would be should be included.
5. Important impacts to seismic, landslide, erosion hazards, stormwater, infiltration, and several other areas remain un-addressed in the SDEIS, typically with indications that this information "would" be provided later. NEPA mandates that this information "shall" be provided. If it is not possible to provide (expense, lack of technology), then "reasonably foreseeable" impacts must be included. This includes "impacts which have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason." Please provide the mandated information before the preferred alternative is chosen. Please include a discussion of the potential impacts.
6. There was no topographical map included so that a reader could clearly understand the grade changes throughout the project. Please include existing topography and post development topography.

#### Transportation Analysis Comments

1. The criteria from FHWA that the road project "have independent utility or independent significance, i.e., be usable, and be a reasonable expenditure even if no additional transportation improvements in the area are made;" was not discussed. Please explain how this road stands alone and how it would be a reasonable expenditure even without improvements to Issaquah-Hobart Road or other projects to reduce the congestion at the interchanges and on all parts of the Front St. corridor.
2. The Transportation Analysis section, was both very difficult to read, complex and based on old information, relying on prior SR-900 traffic studies translated through a calculation that compared 2 models, finally adjusting the numbers on a percentage basis. Traffic counts upon which this model was based predate the opening of the Sunset Interchange. The model should be based on more current numbers. Please clarify, simplify and update.
3. Did this analysis use the functional classifications in the City Code? If this is the case, then Front Street and 2<sup>nd</sup> Avenue will show a lower traffic count with the SE Bypass, as a Principal Arterial (even more, a Regional Arterial at 20% extra capacity) will draw more trips in a gravity model (T-model) than a road with a lower designation. In reality, people will use the road that seems least congested and is therefore quickest, unlike the T-model. This use of functional classification is likely the cause of the traffic volumes on 2<sup>nd</sup> being unreasonably low given historic counts. Please discuss this assumption in the SDEIS main body.
4. Did this analysis include projected Issaquah School District projects that are not in the City TIP or County TIP? There are three projects in the proposed area that will impact traffic flows: The parking is being taken off of 2<sup>nd</sup> and a center turn lane is being provided. The Issaquah

4. Please see response to Comment No. 1 above.

5. The Purpose and Need statement was again agreed to in Concurrence Point 1. The purpose of the project is to provide a more direct access to I-90 for the 24,500 plus, non-city generated vehicle trips that now pass through the City streets each day. The removal of this traffic from Front Street and the community is vital to the long term economic viability of the City's downtown area. The CP3 document discusses how Modified Preferred Alternative 5 meets the Purpose and Need whereas the original Preferred Alternative 6 does not. It was determined that Alternative 5 achieves desired reduction in congestion on I-90 interchanges and on Front Street by diverting traffic away from existing congested city streets.

6. A formal cost-benefit analysis was not a part of the scope of the SE Issaquah Bypass EIS, however, economic impacts are addressed in the social elements section in Chapter 3 of this Final EIS.

7. Supplemental analysis of existing hydrologic conditions and potential permanent stormwater impacts was conducted by the City for the Concurrence Point 3 package, and associated mitigation measures have been expanded upon. This information is reflected in the text of the FEIS. This analysis has resulted in a greater level of surface water hydrology and water quality protection, to an extent that should effectively prevent adverse effects on streams in the project area. There remains a possibility that a minor reduction in ground water recharge would occur as a result of the project. Project design will include a commitment to maximize infiltration of stormwater to prevent and minimize reduction of recharge, but required on-site investigations of soil infiltration characteristics will be deferred until the final project design phase.

8. Existing topography is shown on several of the figures in the SDEIS Technical Appendices. Simulations of post-development topographic changes are not available, however, potential impacts on earth are described in the Geology and Soils section of Chapter 4 of this Final EIS.

9. Issues regarding the proposed SE Issaquah Bypass and independent utility were identified in the SDEIS volume addressing comment letters on the Draft EIS. This response is repeated from the SDEIS text below:

"Through a series of meetings held in summer 1997, it was determined that each of the Issaquah-area projects would have independent utility, and therefore, would be subject to separate environmental review. These meetings, attended by Issaquah, Washington State Department of Transportation, Federal Highway Administration, and project consultant team members, resulted in agreement that independent review should proceed (Position Paper on Segmentation, May 14, 1997; Meeting Notes with FHWA dated August 5 and September 9, 1997). This was determined to be true for all three Issaquah-area projects. The North SPAR project would exist even if the South SPAR project had not been built, and it would still serve the Issaquah Highlands development. The South SPAR project was considered dependent on the I-90 Sunset Interchange and that is why those two projects were linked in a single environmental impact statement. The South SPAR/Sunset Interchange project, however, was not considered dependent on construction of the Southeast Issaquah Bypass or the North SPAR project. Finally, the Southeast Issaquah Bypass is not considered dependent on either of the SPAR projects, nor the I-90 Sunset Interchange Improvements. Since issuance of the Southeast Bypass Draft EIS, both the North SPAR and South SPAR/Sunset Interchange projects have been completed and are serving local traffic needs as intended. Therefore, even if the proposed Southeast Bypass project is not constructed, these two projects will continue to function as designed (page xi, SDEIS Comment Letters, June 2004)."

Middle School parking lot is being reconfigured, as of the last School District/City Council meeting. Also a satellite bus barn is being constructed on the Issaquah Plateau. Please include in the model.

5. Did the modeling include traffic levels on I-90? Other City studies have found that I-90 begins to have large impacts on the local street system due to high volumes and required metering. This has potential to create AM peak queues on WB Sunset Interchange. Please include this in the model.

**The discussion of transit was inadequate:**

1. Please include a discussion of why the SE Bypass will not carry a significant amount of transit.
2. Please include information on Issaquah-Hobart Road and its ability to accommodate transit.
3. Please include information on how the Bypass supports goals for transit in the Comprehensive Plan and in competing for funding.
4. Please include design features required on the SE Bypass to encourage the use of Transit.

**Why were these items omitted?**

1. Why were 2nd Avenue improvements not included as mitigation for Alternative 7, the No-Build alternative?
2. Please include a discussion of whether the road classification for 2nd is changed as it begins to move regional traffic through the City. Why or why not?

**Inaccuracies/Outdated Information:**

1. As we near 2005, the traffic numbers on 2nd Avenue are already higher than the model yet do not seem to be failing as anticipated. (pg 2-22 SDEIS and current traffic counts per PWE, plus several presentations by PWE on traffic functions on 2nd in the PM peak.) Please discuss.
2. The survey of people using Front Street was done in 1999, nearly 5 years ago and is outdated.
3. On page 2-2 second bullet, Front Street South is said to be a Principal Arterial and it is actually a Minor Collector.

**Comparability:** (Can this information be compared to other City traffic information easily?)

1. Why use "delay" instead of "screenpoint analysis" (V/C or V/PC)? Why did you use this delay method for traffic analysis when the Issaquah Planning Department was concurrently updating its own traffic model using "screenpoint analysis"?
2. Please provide current traffic counts so that they can be compared to forecasted volumes for 2005.

**Environment:**

It is important to note that NEPA clearly states that a project must "stand alone", fulfilling its Purpose and Needs Statement without requiring further improvements outside of the project area. It is clear that the Bypass does not "stand alone" and to serve its Purpose and Need. Issaquah-Hobart road must be improved and the Front St. and 900 Interchanges must be improved to potentially allow this corridor to function. NEPA indicates that the environmental consequences of these other needed improvements must then be included in the SDEIS. So please, either prove that one of the alternatives serves the Purpose, or include the environmental review of projects necessary to fulfill the Purpose.

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10. Traffic data from 2000 was used for existing conditions at the time project work was initiated. Traffic modeling for the year of opening in 2010 and for future conditions in 2030 has accounted for the Sunset Interchange opening and potential changes in traffic patterns. Additional traffic information is provided in Chapter 2 of this Final EIS.

11. Functional classification of roadways was included in the travel model. One criterion the travel model analyzes for assigning trips is travel time. More information on the travel model is included in the SE Bypass SDEIS (June 2004) as Appendix F, *Transportation Technical Report*.

12. When the travel model was developed the three projects noted were not under consideration. These projects, if considered in the model, would have little if any impact on traffic demand questions; therefore the SE Bypass model remains valid.

13. Interstate 90 was included and analyzed in the SE Bypass traffic model.

14. Please refer to the SDEIS Appendix F, *Transportation Technical Report* for a more detailed discussion of transit in the proposed SE Bypass study area.

15. The City of Issaquah has not committed to specific projects that could potentially address the purpose and need of the SE Bypass roadway if the project were not constructed. Other project actions the city might pursue would require separate environmental evaluation and are not considered in this document.

16. The Transportation Element of the 2005 Issaquah Comprehensive Plan continues to identify Second Avenue as a collector arterial, not intended to serve regional traffic.

17. Traffic modeling indicates that without the proposed SE Bypass 2nd Avenue would become more desirable for cut-through traffic adding considerable volumes to this roadway. Under Modified Alternative 5, traffic would bypass 2nd Avenue because its capacity as a principal arterial would be greater than that provided by 2nd Avenue in its function as a collector arterial. The 1999 traffic study was conducted to provide additional information on the use of Front Street by commuters. Because commute trips on Front Street have not diminished, it is likely that many of the conclusions of that study remain valid today. The Roadway Classification Map in the City's 2005 Comprehensive Plan identifies Front Street as a minor arterial, except at its northern and southern ends, where it transitions to a principal arterial.

18. Providing intersection analysis and using delay information is usually more detailed than a screenpoint analysis, which is typically considered as a planning-level analysis tool.

19. Modified Alternative 5, which was determined to meet the purpose and need, was selected as the new preferred alternative. Alternative 5 would reduce congestion on Front Street and improve access to I-90 interchanges by diverting traffic away from existing congested city streets, as indicated in Chapter 2 of this FEIS and the City's Concurrence Point 3 Packet.

## Geology and Soils:

The geology of the Bypass site is the core of the critical area impacts. It has not been adequately studied, with the report indicating that these studies will be performed at design. (See general comment #5, pg1)

As we have seen from the Issaquah Highlands and the Sunset Interchange, several secondary impacts having to do with Geology and Soils have occurred in those similarly challenged projects. Please realistically describe potential secondary impacts such as downslope harm, downstream turbidity issues and describe how these potential issues will be mitigated.

## Sensitive Areas:

1. Steep Slopes: The difficulties of cutting and filling in steep slopes with perched water layers were not addressed. There was no discussion of risks to downslope homeowners and City liability. Please include (see general comment #5, pg1.).
2. Seismic Hazards: The consequences of building in a seismic hazard area were not addressed. Please include (see general comment #5, pg1)
3. Landslide Hazard: The language on pg 4-29 of the SDEIS indicates that borings show that there is not water in the landslide hazard area. Then on page 4-260 and in the Earth Technical Report water/seeps are described to the north in this same area. The SDEIS indicates that no mitigation is necessary because these hills have no water or seeps. Please change and address. Also the potential consequences of building in a landslide hazard area were not addressed. Please include (see general comment #5, pg1).
4. Erosion Hazards: There are no specific erosion controls mandated. Please clearly describe what will be required and how and when these will be implemented. Also the potential consequences of erosion were not addressed. Please include (see general comment #5, pg1).
5. Please describe the cumulative totals of disturbed soils from the Sunset Interchange, SSPAR, Issaquah Highlands, SE Bypass and Park Pointe. Please describe the impacts of those totals on the entire corridor system. Please tell the reader how effective the mitigation efforts have been for the Sunset Interchange, SSPAR and Issaquah Highlands. Perhaps a list of the turbidity violations would be helpful.

## Hydrology

### Surface water

1. It is important to note that stormwater facilities are not considered mitigations. They are permit conditions and may need to be considered as impacts. NEPA states that they must be indicated so. The SDEIS describes them as mitigations erroneously. Please remove or clarify.
2. Water is to be managed using the KC Level 2 flow control. Why is KC Level 3 not used on the southern portion of the road as the stormwater clearly releases into the floodplain, flowing shortly to the floodway (flood hazard areas as defined by flooding every 100 years)?
3. The DEIS sometimes says that proposed facilities will maintain pre-existing flows, in some areas only peak flows and durations are mentioned. Please clarify.
4. NP-1 (an infiltration pond located just across Sunset Way from the WSDOT infiltration ponds), would overflow to the East Fork at a 4 year storm. Please explain clearly what happens to the water above a 4-year storm.
5. Please explain what happens if the infiltration facilities do not function as planned (see general comment #5, pg1).
6. East Fork: Flows to the East Fork would be reduced between 8,800 to 48,000cu ft per year. Please explain the consequences to Chinook Salmon of this reduction. And please explain how this replicates pre-existing flows.

20. Please see responses for the letter from the Issaquah Alps Club and the first response to this letter above.

21. See response for the Issaquah Alps Club and Connie Marsh (July 13, 2004). The risk to adjacent properties from cutting and filling will be evaluated by completing slope stability analyses and estimating Factors of Safety (FOS). FOS is a measure of the effectiveness of the improvements with respect to the potential for a slope stability failure.

22. The SE Bypass project will cross a seismic hazard area along the south end of the alignment. The seismic hazards that exist in this area are not particularly different from other seismic hazard areas within Issaquah that are developed as urban areas. Design of the roadway across the seismic hazard area will include standard design and construction methods in accordance with accepted engineering standards for this type of construction. In addition, other structures, such as retaining walls at the north end of the Bypass which is not considered a seismic hazard area, will be designed and constructed using accepted engineering standards that include seismic loading during earthquake events.

23. Please see responses for the letter from the Issaquah Alps Club and the first response to this letter above.

24. During the design phase of this project, a detailed Temporary Erosion and Sediment Control (TESC) Plan will be developed that will specifically describe proposed erosion control measures.

25. Secondary and cumulative impacts on water quality are described in this FEIS. Turbidity problems encountered by other projects in the area would likely indicate that construction of the Southeast Issaquah Bypass project will receive similar scrutiny for effective erosion and sediment control measures by the City, citizens, and the Washington State Department of Ecology.

26. Comment noted. The discussion of stormwater hydrology and water quality impacts presented in this FEIS states that the stormwater management facilities proposed for the project are required. There are, however, additional mitigation measures proposed for hydrology and water quality purposes, such as use of compost to amend soils in off-road areas and retrofitting of a sanitary sewer system in the neighborhood near the south end of the bypass corridor that are not explicitly required and thus are not stated as such in the FEIS.

27. Level 3 detention requires that in addition to flow durations not exceeding 1/2 of the 2-year storm through the 50-year storm, the detention facility must hold the 100-year peak flow rate at its predevelopment level. Level 3 detention is intended to mitigate water level changes in certain volume-sensitive water bodies such as lakes, wetlands, and closed depressions, where severe flooding problems have been documented. The project site is not situated within a mapped area requiring Level 3 detention. While flooding may occur, it does not meet the requirements for Level 3 detention. Therefore, the City of Issaquah has determined that Level 3 detention requirements are not required for this project.

28. All flow releases from detention facilities would not exceed peak predevelopment flows and flow durations would match the 1/2 of the 2-year storm through the 50-year storm.

7. North Tributary/Floodplain/Floodway: Flows in the North Tributary would be less in the dry season and higher in the wet season as 4 southern ponds either infiltrate or outlet into this tributary. The SDEIS has not found or researched any base flow records for this tributary nor has it discussed the impacts to the tributary with this increase in water volume. Please include baseflows, changes to base flows, and impacts of these changes in the floodplain and floodway.
8. The impacts on the North Tributary for alternatives 2,4,6 are less than alternatives 1,3,5, "though the increased prevalence of moderately high flows could result in greater incidence of minor over bank flooding between the SE Bypass and Front Street South." Please clarify this statement and discuss how increased flooding is allowed.
9. **Agency rules and Issaquah Code:** The City Code allows for a utility exemption in some circumstances. Through the 404 Merger process many of the agencies indicated that some of these impacts were not allowed. For more information on agency questions look in the "Letters and Comments" appendix of the SDEIS. Please address the 404 Merger concerns.
10. The three small streams and several small wetlands that reside on the hillside overlooking the Sunset Interchange have not been addressed in this report. As you recall, this used to be the City's water source. The artesian well that created difficulties at the end of 6<sup>th</sup> at the foot of the Sunset Interchange onramp (the proposed location for the infiltration pond) was also not addressed. Please include.
11. Interestingly the Water Balance that was used to create runoff scenario is the same Water Balance used by Issaquah Highlands. As I recall they left out the amount of water that the trees held in storage in that calculation. Anyway, on pg 16 of the "Waterways and Hydrologic Systems Technical Report by Herrara in September of 1998" states, "With a lack of definitive recharge information applicable to this project, it is assumed that recharge rates in the SE Bypass project area are similar to those derived in the Water Balance prepared for the Grand Ridge EIS (now Issaquah Highlands)." Several engineers have concerns over the validity of this water balance. Please address. Also, please ensure that the large amount of water stored by the trees to be removed are included in the calculations.
12. Please explain how the water being intercepted by the roadway from the hill above is being managed and accounted for.
13. Also on page 4-260 "In a larger context, the road improvement projects considered in this assessment of secondary and cumulative impacts would cover a minor proportion of the total Issaquah basin area. Therefore, other land uses throughout the basin can be expected to have a greater influence on groundwater recharge and storm water runoff patterns in this basin." This is a flawed statement. In secondary and cumulative impacts the small pieces are gathered together to show the impacts of the total. Please remove this sentence.
14. The infiltration pathway is supposed to generally follow the terrain, yet no topographical maps are given in the SDEIS. Where is the infiltration water going?
15. There is no discussion of potential downslope impacts to residents and School District properties from use of infiltration facilities.
16. If Puget Sound Energy clears an additional corridor for moving its power lines, can the proposed stormwater facilities accommodate the additional water?
17. The Issaquah Highlands was not included in the discussion of cumulative impacts. Please include. Please quantify the total amount of water in understandable terms that needs to be infiltrated from this previously connected series of projects (North SPAR, SSPAR, Sunset Interchange, Bypass plus the Issaquah Highlands). Please describe how much water is currently being infiltrated and how much of that water is recharging the Lower Issaquah Valley Aquifer.

#### Flooding

1. I do not understand how the undersized ponds, including ponds that are supposed to infiltrate, are going to contain the pre-existing water plus the new water from impervious surfaces and the removal of vegetation and top soil when they are only holding a 50year storm maximum. The SDEIS seems to contradict itself. Please explain.
2. Please address the issue of stormwater outfalls into the floodplain taking up floodwater storage.
3. Please address the impacts to the wetlands for storing flood waters.

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29. The FEIS assumes a "base scenario" for stormwater effects that reflects much less infiltration of runoff from the project site than described in the DSEIS. Attachment C to the Concurrence Point 3 Packet presents a detailed discussion and calculations of hydrologic impacts for this base case scenario, and an "alternate scenario" wherein more project site runoff is assumed to infiltrate at North Pond N-1 and at South Pond S-1. The project design would focus on maximizing runoff infiltration, and would include extensive on-site explorations at proposed pond sites to confirm infiltration potential for pond design. Chapter 3 of this FEIS includes more discussion about potential effects on streamflow, surface water quality, and aquifer recharge and references the Concurrence Point 3 Packet for more information on these subjects. For ponds that are designed as infiltration facilities, overflows in extreme storm events would be routed to the nearby stream in a constructed stormwater conveyance system designed to handle those overflows without eroding the conveyance system.

30. As described in the FEIS, it is difficult to predict the interaction of groundwater and flows in East Fork Issaquah Creek at the north end of the bypass corridor. Thus, the FEIS does not include listing of estimated flow volume reductions in East Fork Issaquah Creek under the "alternate scenario" of stormwater management wherein most of the runoff directed to North Pond N-1 would infiltrate the ground. The FEIS describes a "base scenario" for stormwater management wherein it is assumed that North Pond N-1 would not infiltrate much water, and most of the runoff entering this pond would flow to the East Fork after being temporarily detained. In this base scenario, average annual flow volumes in the creek would increase. However, the alternate scenario is preferred for reduced environmental effects, and thus infiltration would be pursued at this pond site to replicate pre-existing flows as much as possible. The FEIS includes quantification of the percentage flow increase or reduction in area streams under both the base scenario and alternative scenario, concluding that those changes would represent a very small fraction of the summer base flow, and thus would not adversely affect fish populations in these streams.

31. The supplemental analysis of existing hydrologic conditions and potential permanent stormwater impacts presented as Attachment C to the Concurrence Point 3 package, and summarized in this FEIS, includes additional analysis of hydrologic effects on the north tributary.

32. Comments noted. City staff would review and determine approval of any exemption requests for the proposed project.

33. The small streams and wetlands on the hill overlooking Sunset Interchange are outside of the Southeast Bypass project limits and thus are not discussed in this EIS. The well on 6th Avenue near Sunset Way was a monitoring well drilled for the Wellhead Protection Plan that encountered an artesian water bearing layer at considerable depth (65 feet). This well was capped and abandoned as part of the I-90 Sunset Interchange project. The City did not consider that well to be problematic. As discussed in the Geology and Soils section of Chapter 4 in this FEIS, and in Section 7.4 of the Concurrence Point 3 packet, groundwater and soil boring information for the north end of the project indicates that artesian groundwater won't be encountered during Southeast Bypass construction because those geologic conditions are found 250-300' east and 50' below the proposed roadway.

4. Please require a master drainage plan that specifically monitors levels in the North Tributary and East Fork of Issaquah Creek, compares them to a baseline, describes a conservative allowable deviation and requires fixes if above the allowable levels and what will occur if these levels are not achieved.
5. Please include in the budget for this project the funding of these monitoring efforts plus a reserve account for problems.
6. The cumulative impacts of adding Park Pointe Development water to the North Tributary (The North Tributary is a tiny stream, 1.5 ft wide in the summer and somewhat larger than that in the winter.) are very large and not accurately represented in this document. (Please clarify)
7. Please provide a % volume increase when Park Pointe drainage combined with SE Bypass drainage is added to the existing condition flows in the North Tributary.
8. Please discuss the impacts of these increases to downstream land owners and other areas in the Floodway and Floodplain. Please describe mitigation or potential legal consequences.
9. Please provide predevelopment flow statistics on the East Fork (before Issaquah Highlands, SSPAR and Sunset Interchange.) Please provide the changes to flows with the Highlands/SPARs and Sunset Interchange built. Please then add on the potential impacts of the SE Bypass with an infiltration pond proposed to have 4-year storm capacity. Please describe any potential risk of increased flooding downstream. Please describe mitigation and legal consequences.
10. Also please include flows from Issaquah Creek before and after the inlet of the North Tributary.

#### Water Quality

1. The Biological Assessment, pg 55, says that storm water will be treated to WSDOT level C and then discusses some other options. Are all the options the same? Can they pick and choose? Please explain.
2. **Temperature:** The North Tributary is spring fed and flows through dense vegetation. The proposed project will eliminate at least 20 trees from the riparian area and will increase temperatures slightly in North Tributary until replacement plantings mature. Please address this issue in detail. Also please discuss the water temperature from the infiltration facility feeding the North Tributary and the potential impacts to riparian habitat, wildlife and salmon.
3. **Sediment:** North Tributary is a very small stream dominated by fine sediments. The gradient and flow are low enough that the high silt and sand content is a natural condition. Some construction disturbances are probable but with the TESC plans of the proposed project implemented it is not expected to affect this parameter on a watershed scale. (Pg 59 of the BA) Please explain how much the flows will be increased in the North Tributary in winter and the consequences of these increased flows to turbidity and in turn riparian habit and salmon impacts.
4. **Chemical Contamination:** The likelihood of spills increases, but conservation measures will be taken to prevent spills, and contamination materials will be kept on hand in case of spills. There is some increased risk of spills from truck usage. What are the consequences of a spill?
5. Pg 4-68 says that the project will replicate the existing drainage to maximum extent feasible. It seems feasible to treat water in treatment ponds before infiltrating or releasing to the surface water system. (What happens in the 4 year+ events with water quality to East Fork? What happens in 15 year+ events with water quality to North Tributary or wetlands?)
6. Where does the Sunset Way infiltration pond fall in the wellhead protection areas?
7. Please address how this project falls within the Critical Aquifer Recharge Area mapping and discuss the draft regulations expected to be in place by the end of the year and how the SE Bypass complies.
8. Please include the Issaquah Highlands projects in this analysis, including upstream impacts on the East Fork.
9. Please include mitigation for the No Action alternative that includes water quality treatment on Sunset Way and 2<sup>nd</sup> Ave.

#### Wetlands:

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34. The water balance calculations performed for the Southeast Issaquah Bypass, the most recent of which are documented in Attachment C to the Concurrence Point 3 packet, are based on an approach that accounts for evapotranspiration by trees and other vegetation, where present. For the purposes of this EIS it is impossible to use site-specific recharge data for the existing condition because such data do not exist. It was considered beyond the scope of the EIS effort to collect extensive data on precipitation, evapotranspiration, and recharge in the project corridor, and thus the data were not collected that would otherwise have enabled refinements to these water balance calculations. The intent of those calculations is to discern general trends in hydrologic changes, not to forecast specific volumes of runoff and recharge.

35. The design of the large retaining walls in the north end of the project corridor will account for interception of shallow ground water and discharge of that water to either ground water or East Fork Issaquah Creek along with other site drainage. As discussed on page 16 of the Concurrence Point 3 packet, the retaining walls and associated hillslope excavations are not expected to encounter great amounts of shallow groundwater.

36. This paragraph has been deleted in the FEIS.

37. The discussion of existing hydrologic patterns and proposed stormwater management facilities presented in the Concurrence Point 3 packet addresses this comment in detail. Briefly, water that infiltrates the ground in the northern part of the project corridor is likely to percolate to the deeper water table of the lower Issaquah Valley aquifer, whereas water that infiltrates the ground in the south end of the project corridor is likely to re-emerge in a stream. Insufficient information is available to define specific pathways of subsurface flow beneath the prospective pond sites. Additional data would be collected during project design to enable more definitive understanding of these pathways.

38. The discussion of existing hydrologic patterns and proposed stormwater management facilities presented in the Concurrence Point 3 Packet supports an assessment that adverse effects are not expected to downstream property owners nor Issaquah schools as a result of stormwater infiltration plans.

39. Potential relocation of power lines is not expected to result in a substantial amount of new impervious surface and thus would not affect the proposed stormwater facilities.

40. Cumulative effects of stormwater infiltration from these projects, as well as all other development in the Issaquah Valley that could impact the aquifer, is beyond the scope of the SE Bypass EIS. The SE Bypass has adequately addressed the stormwater infiltration issues on a project level to the satisfaction of all regulatory agencies. This acceptance does not require a detailed analysis of how other projects in the watershed managed their stormwater because this would be an exceedingly difficult task having little or no value to this EIS. The assumption is that all the other projects conducted their own evaluation of stormwater infiltration and mitigated their impacts in ways acceptable to the permitting agencies. If needed, regional evaluation of stormwater management techniques should be done on a programmatic level so that current management practices can be affirmed or modified as appropriate.

41. See response to comments #29 and #37 above. Under the design requirements of the Department of Ecology's *Stormwater Management Manual for Western Washington*, not only are peak flows matched, but flow durations may not be exceeded for 1/2 of the 2-year storm through the 50 year storm. Detention facilities proposed for this project will meet this requirement.

1. The wetland delineation is out of date. (5 years for NEPA, 2 years by City Code)
2. Wetlands HS and GW are said to be hydrologically connected but the buffer on HS is not 100ft as it should be via City Code. Please change.
3. Wetland GW is considered a Category II wetland in several places (Ecology rating) yet the Ecology letter (see comment letters in SDEIS) indicates that it is a Category I. The SDEIS indicates that one section of GW is considered Category I, in one section outside of the limits of the proposed development however the rest of the wetland is considered Category II. There is no discussion of this determination or conversation about these discrepancies. Please include.
4. Some agencies' comment letters requested a 200-300 ft buffer for wetland GW. The buffer offered in the SDEIS is 100ft. Please address agency comments.
5. I had difficulty tallying the buffer impacts and translating the impacts to buffer improvements. Please clarify.
6. Can/should an infiltration pond be sited in a Class I wetland/Category I wetland buffer. This siting must be considered an impact.
7. There are several critical area impacts that would violate our City Code but would be allowed with conditions using a Agency and Utility Exemption if there is "no practical alternative". Would the other agencies have stricter standards and should those standards be the ones used in the final EIS if this is so?
8. The SDEIS says that the Bypass would alter the hydrology of HS, reducing fluctuation and increasing plant diversity by replacing the culvert and adding extra water from the detention pond located next to it. Is this an enhancement in itself or is this an impact? Please clarify.
9. How can the City ensure that the wetland creation will be monitored without bonding? (As the City, of course, requires no bonding.) Please discuss.
10. NEPA guidance indicates that a 10 year monitoring period for wetlands is expected. Please extend that monitoring period.
11. There is little discussion of how the wetland creation and buffer improvements will replace the functions of the impacted areas. Please provide.
12. Please include the amount of total wetland per class impacted by Issaquah Highlands, South SPAR, Sunset Interchange, SE Bypass, SR 900 improvements, Talus and Park Pointe. Please discuss the cumulative % of wetland classes impacted in Issaquah from the total of these projects. Please also add an update on the wetland mitigations as they currently exist in each of those areas.

#### Vegetation and Wildlife:

1. The study of the vegetation and wildlife was done in 1997 and 1998. Is this current enough? Recent tours of the area show a reduction of invasives and an increase in native vegetation thus an increase in quality. Please revisit.
2. There is little value given to vegetation value of shading, erosion protection, water storage capacity and noise reduction. Please include.
3. The SDEIS cites current pedestrian use of primitive roads and trails and gun club as contributing to the disturbance of wildlife. There is little discussion of how much more impact is contributed by a roadway. Please compare.
4. There is no mention in the BA of the impacts to the pileated woodpecker, band tailed pigeon or the Vaux's swift, priority species, though all three have been seen on the Tradition Plateau (pg 4-101 SDEIS). Please include.
5. Please quantify the cumulative acreage of clearing from the Issaquah Highlands, Sunset Interchange, SSPAR, SE Bypass and Park Pointe. What % of the acreage of Issaquah is that?
6. Please discuss potential migration/concentration of wildlife to areas east and south of the SE Bypass due to this road/retaining wall barrier.

#### Fisheries/Threatened and Endangered Species

1. Please explain the impacts of the findings below.
  - Bald eagle habitat may be "affected but not adversely affected". (BA pg 70)

42. A Master Drainage Plan would not be required for the proposed project. The City may consider preparation of this and other plans for resource protection within its jurisdiction. The city will determine how best to fund monitoring and other commitments needed for project approval.

43. Supplemental analysis of existing hydrologic conditions and potential permanent stormwater impacts is presented in the Concurrence Point 3 Packet, and summarized in this FEIS, including hydrologic effects on the north tributary. The Park Pointe project proposes to infiltrate most of its stormwater runoff that would drain overland to the north tributary, and has conducted detailed investigations of that stormwater plan to support it. Thus, it is not expected that the SE Bypass would have significant cumulative hydrologic effects on the north tributary that add to effects from the Park Pointe development.

44. Secondary and cumulative impacts related to stormwater are described in Chapter 3 of this Final EIS and the potential for substantial impacts on the East Fork of Issaquah Creek is not noted. Potential impacts on the East Fork are expected to be reduced by project-specific mitigation measures required by state and local regulations.

45. The project is partially located in the proposed CARA boundary. The CARA is intended to regulate hazardous materials used and generated at businesses, which don't apply to the SE Bypass. The CARA may include a stormwater infiltration requirement, which the proposed project is compliant with.

46. Herrera visited the project site in 2005 to confirm the wetland delineation. Several changes to wetland boundaries were made at that time. Wetlands GW, HS, VL, and RD are considered to be hydrologically connected. They are rated as Class 1 under the City of Issaquah system, and are required to have a 100-foot buffer. The project proposes 110-foot buffers for all wetlands, per Ecology recommendations. Ecology has agreed that Wetlands GW, VL, HS, and RD, when rated as one unit, meet the definition of Category II wetland. Potential buffer impact and mitigation areas are included in the FEIS and the Conceptual Mitigation Plan. The stormwater pond S-1 is proposed to be outside the 110-foot buffer, and is not considered to have an impact. The project would comply with appropriate standards and if City standards are not sufficient, the project will incorporate other agency recommendations. Modified Alternative 5 does not propose impacts to Wetland HS or its buffer. The project would not replace the culvert connecting Wetlands HS and GW. The project will be monitored for at least 10 years. The length of the monitoring period will be discussed during development of the final mitigation plan. A permit condition will require that monitoring reports be submitted to the Corps of Engineers, Department of Ecology, and Issaquah during specific monitoring years. If performance standards are not met at the end of the required monitoring period, a contingency plan will be implemented and the monitoring period extended. Functions of existing wetlands are discussed in the Conceptual Mitigation Plan. A general summary of impacts versus mitigation also is provided in the Conceptual Mitigation Plan and the FEIS. A detailed functions analysis will be included in the final mitigation plan, after the final decision has been made regarding the mitigation site(s). The City does not maintain a database of all wetlands mapped, disturbed or mitigated on projects in or near the City. Having such data would be useful for informational purposes only and wouldn't influence how wetlands are mitigated in the SE Bypass project because published Ecology guidance is used for that purpose.

- **Bull trout:** The City is requesting initiation of "formal consultation" w/USFWS in accordance with Section 7 of ESA because of a finding of no effect on bull trout critical habitat. (BA pg 70)
- **Chinook Salmon:** This project "may affect and is likely to adversely affect" the Puget Sound Chinook salmon.

2. Please discuss the cumulative impacts to endangered species from Issaquah Highlands, Sunset Interchange, SSPAR, SE Bypass and Park Pointe.

#### Visual Quality:

1. The WA Transportation Commission's Policy Catalog contains a specific policy on visual quality. Policy 6.3.6 is to "protect and enhance the Visual Quality of Washington's transportation corridors and facilities" and "identify outstanding vistas visible from transportation corridors, then protect, restore, and enhance them." Where is this policy addressed?
2. The Visual Quality section, by using only portions of the WSDOT guidance manual, does not fulfill the FHWA requirements. Please provide all of the information from the WSDOT checklist or utilize the guidance provided by FHWA.
3. The section on Visual Quality does not show comparison before and after pictures of the same view. Each of the pictures is either facing a different direction, in a different spot or not paired with a before or after picture. It was very difficult to understand how the evaluation for visual impacts was made. Please make this section understandable and comparable to the reader.
4. Who decided how to score the Visual Quality? For example, at 6<sup>th</sup> and Bush, when plans indicate that 2<sup>nd</sup> growth trees would be replaced by a concrete wall, it showed only a .08 reduction in view quality. This is not reasonable. Please describe who, when, for how long and how and what changes to the visual area were provided to the viewers.
5. The viewsheds do not address views from surrounding hillsides, Squak and the south side of the Plateau, or Sycamore all of which will be largely impacted. Also the views from I-90 remain un-addressed. Please address.
6. The viewsheds do not address views from the Olde Town neighborhood which will be heavily impacted. (Example, Andrews looking East, Bush looking East.) Please address.
7. There is no discussion of glare and lighting included. Please discuss.
8. There is no discussion of views from the road included. Please discuss.
9. In RCW 84.34, the legislature declared that "it is in the best interest of the state to maintain, preserve, conserve and otherwise continue in existence adequate open space lands for the production of food, fiber and forest crops, and to assure the use and enjoyment of natural resources and scenic beauty for the economic and social well-being of the state and its citizens." Open space was defined as including any land area that would preserve Visual Quality along highway, road, and street corridors or scenic vistas. One of the criteria to be used in determining open space classification for current use or conservation futures is whether granting this classification would preserve Visual Quality along highway, road, and street corridors or scenic vistas (RCW 84.34.037). Please discuss how Visual Quality of this road is in keeping with this RCW.
10. Has the movement of Puget Sound Energy power lines been included in project viewscapes (ie, clearing an additional corridor for these lines)?
11. Please describe the cumulative impacts of Visual Quality in Issaquah from the total of Issaquah Highlands, Sunset Interchange, SSPAR, SE Bypass and Park Pointe as built out to capacity from that prior to any clearing in these areas.

#### Air Quality:

1. There is no discussion of air quality monitoring to ensure that quality is not decreased beyond a fixed allowable amount without mitigation being required to raise the air quality to an allowable range.
2. Can we remove trucks from this corridor if air quality standards are exceeded?

47. An additional onsite visit was conducted in 2002. It has been determined that the data is current enough to proceed without additional surveys. 2)The function and value of vegetation is commonly known and does not require specific identification. The SDEIS describes the unique qualities of priority habitats in the project area as well as the functions and values of project area wetlands. These values were considered in selecting appropriate mitigation for the project. 3)The project is located in a transition area between public lands and urban development. This area provides edge habitat and supports wildlife with small home ranges, wildlife adapted to edge habitats, and wildlife that forage in urban settings. It is not suitable for species with large home ranges or species requiring extensive intact forested habitat. For those species, this area is primarily a potential corridor to other intact forested habitat associated with Squak Mountain State Park. For the species that thrive in the current project area, a new road corridor would present a substantial impact if it isolates them from foraging sources (urban neighborhoods). These effects are disclosed on page 4-105 of the SDEIS. Some of these effects would be offset by the wildlife corridor at the North Tributary and Wetland GW. Many of the affected species are highly adaptable and will find alternative foraging areas, travel routes, or move on to better habitat. This road corridor is directly adjacent to the urban boundaries of Issaquah. The total project effect is a loss of 26 acres of habitat, which is a relatively minor amount of habitat and would not have a substantial impact on forest-dwelling species. The best movement areas for those species appear to be further south in the Issaquah-Hobart Road corridor. 4) The Vaux swift, band-tailed pigeon, and pileated woodpecker are state priority species. Their presence in the project area is discussed on page 4-104 of the DSEIS. The DSEIS does not disclose effects of the project on these species. That discussion has been added to the FEIS. The Biological Assessment (BA) addresses impacts on species listed under the Endangered Species Act and is not the appropriate location for the discussion of effects on state priority species. Therefore no revisions to the BA were made. 5)The Issaquah Highlands, Sunset Interchange, Park Pointe, and SE Bypass would affect approximately 877 acres, representing 7.7 % of the incorporated lands of Issaquah (6,819 acres). All of these projects are located in areas targeted for growth and development. The city also actively provides planning to preserve open space, recreational facilities, and habitat for wildlife and fisheries. 6)The City recognizes that more needs to be understood regarding the migration patterns of large mammals between Tiger and Squak Mountains. The city has agreed to participate monetarily to help initiate a study and planning effort to address regional wildlife connectivity. The City has also agreed to facilitate a discussion during the project design stage with WSDOT through an inter-agency request to evaluate maintenance needs at the existing wildlife crossings on I-90 in coordination with WDFW and USFWS.

48. A revised Biological Assessment has been prepared and is included with this FEIS. This document includes new information on threatened and endangered species in the project area. This information also has been updated in Chapter 4 of this FEIS.

49. The policy appears to refer to transportation corridors along existing state routes. The proposed roadway would be designed to be compatible with the project area and would include landscaping along the route. Visual quality analysis followed FHWA guidelines and was reviewed and approved by state and federal staff prior to issuance of the DSEIS. It has been acknowledged that view ratings are subjective and may be dependent on individual viewer sensitivities. Existing topography and vegetation obscure views from locations near the northern project area. Low scores for expected change ratings reflect these conditions. Representative view locations were chosen for areas near the proposed project route. Views from the eastern portion of Olde Town are considered in the DSEIS. Views from I-90 would be affected by distances and travel speeds along the interstate. Temporary views of portions of the proposed roadway from I-90 may occur in some locations.



3. Current emissions loads on Front Street are in a sparse residential area and at hours primarily unoccupied by pedestrians. Moving traffic onto the Bypass will transfer those loads to local residential and school areas especially during morning rush hour when students are walking and biking. Please address this.
4. Please include Air Quality mitigations for the No-Build alternative.
5. There is no discussion of the increase of traffic impacts from the Sunset Interchange, SSPAR and the Issaquah Highlands from a pre-build base so that the reader can understand what the air quality was before this previously connected series of projects was built.

**Noise:**

1. There is no discussion of the potential for noise to bounce from the retaining walls to the downtown area and Squak Mountain neighborhoods. Please address.
2. There is no discussion of noise monitoring to ensure that sound is not increased beyond a fixed allowable amount without mitigation required to reduce the noise to allowable range.
3. There is no discussion of increased noise levels from additional heavy trucks—including garbage trucks going from transfer stations to the Cedar Hills landfill, which were previously barred from Front Street, using the Bypass.
4. There is no discussion of impacts to Tiger Mt. High School as its property doesn't directly border the Bypass route, however, its proximity would infer increased noise levels.
5. There is no discussion of what the noise levels were prior to the Sunset Interchange, SSPAR and the Issaquah Highlands so that the reader can understand the noise level increases before this previously connected series of projects was built. Again, mitigation should/shall include monitoring of noise levels and a plan and funding package to keep noise impacts below a certain standard.
6. There is no discussion of the impacts of noise to Issaquah High School, Tiger Mt. High and Clark Elementary from roads both in front of and behind these schools.
7. Has increased military, commercial and recreational air traffic above this area been addressed? (Anecdotal information suggests that this is significant.)
8. Please include noise mitigation for the No Action alternative.

**Land Use:**

1. The Issaquah Transportation Element Update indicates that all of the Principal Arterials, including the Bypass, will be failing within a short period of time, then refocuses solutions onto multi-modal transportation. Please include this new language in your discussion.
2. The Comprehensive Plan indicates that transportation improvements should not put pressure on increased development south of town, yet the SDEIS indicates that building the SE Bypass will do that. (Pg 4-268-4-269 SDEIS)
3. We found nothing in the Comprehensive Plan that says that the Bypass is the "primary means of resolving traffic congestion" (pg 4-143 SDEIS). This is old Comp Plan language. Please update.
4. Park Pointe has declined to include any building plan that does not include the SE Bypass, indicating that Park Pointe is reliant on the SE Bypass, contradicting the SDEIS that indicates that Park Pointe will be built anyway. It is probable that a development could be built on that property in the future, without the SE Bypass, if land/housing values increase enough to ensure profitability of development.
5. The Wildlife and Trail Recreation Plan from 1992 formally includes the railroad grade behind the High School, designated Issaquah Trail, and the trailhead at 2<sup>nd</sup> into the Comprehensive Plan. Please change the "informal" designation for both of these recreational facilities.
6. The SDEIS does not accurately represent the change from rural trails used frequently by walkers, runners and bicyclists to a sidewalk along a 4-lane road with trucks, a 35 mph speed limit, limited access for crossing and the removal of the trailhead at 2<sup>nd</sup> Avenue. Please include.
7. Please discuss the pressure to move the Urban Growth Boundary by increasing volumes of traffic on Issaquah-Hobart Rd.
8. Please discuss the impacts of providing access to parcels that could then be developed.
9. The Land Use discussion in this section was unclear. The study cited on pg 4-268 by Hartgen, 2003a and Hartgen, 2003b that indicates that things other than transportation may influence growth significantly is also unclear. This could be construed to mean that we do not

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Squak Mountain and the Sycamore area are several hundred feet south and west of the proposed project's southern limits. It is possible that portions of the proposed roadway would be visible in background views in these locations. Changes in views from these areas would be consistent with the general change toward a more urban character occurring in many parts of the city. The DSEIS did state that light and glare would be visible in places along the proposed roadway. Views from the roadway would include foreground views of landscaping, roadway walls, residences and buildings. Middle ground and more distant views would include trees and hills to the east, and residences and other buildings to the west. The proposed project would be consistent with adopted land use policies of the city of Issaquah. Land on which the roadway would be constructed is zoned for residential uses and is not classified as open space, nor is it designated for food fiber, forest, natural resource or scenic beauty uses identified in the RCW. The proposed project would include landscaping and replantings along the project route and in areas where existing features, such as power lines, could be moved, appropriate landscaping would be provided. Secondary and cumulative impacts are described in Chapter 4 of the DSEIS and Chapter 3 of this Final EIS.

50. and 51. The project followed WSDOT air quality guidelines, these guidelines can be found on the internet at the following website:

<http://www.wsdot.wa.gov/fasc/EngineeringPublications/Manuals/EPM/425.pdf>

No mitigation is needed for the No-Build alternative. The Existing conditions have been established as the year 2000. Air quality impacts and mitigation requirements are based on the analysis for the year of opening and the design year. For the Southeast Bypass project, the air quality analysis for the year of opening (2010) and the design year (2030) include the effects of Sunset Interchange and secondary changes in traffic flow.

Regional air pollutant trends have generally followed national patterns over the last 20 years. While the average weekday vehicle miles traveled in the central Puget Sound region has increased from 30 million miles in 1981 to 65 million in 1999 (PSRC 2000), pollutants associated with transportation sources have decreased over time due to more stringent federal emission standards for new vehicles and the gradual replacement of older, more polluting vehicles. The downward trend for pollution emissions is predicted to continue with the implementation of EPA Tier II Gasoline/Sulfur Rule. The Puget Sound Clean Air Agency (PSCAA) is responsible for monitoring, setting standards, and regulating development to achieve regional air quality standards in the King, Kitsap, Pierce, and Snohomish counties. For additional information regarding air quality in the region, please visit the PSCAA website at: <http://www.pscleanair.org> or call the PSCAA at 206-343-8800.

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52. (1) It is correct to say that noise can travel from low-lying areas to areas above. However, Squak Mountain residences are located further than one-half-mile from the project area. Residences at this distance would not experience a noticeable change in noise levels from the project. As a comparison, Noise Receptor I is located 250 feet west of the project. Existing and future noise levels at Noise Receptor I are predicted to be 60 dBA for the existing conditions and future conditions with the project. With no change in noise levels resulting from the project at 250 feet, no noticeable change in noise levels resulting from the project are predicted at residences located at least one-half-mile from the project on Squak Mountain.

WSDOT's Traffic Noise Analysis and Abatement Policy and Procedures guidance states that though some sound may be reflected from a barrier placed on one side of the roadway to the unprotected side, little benefit is derived from making the wall absorptive. Furthermore, studies have shown that any measured increases in sound levels have been less than can be perceived by normal human hearing. When noise levels are predicted to exceed 66 dBA for in the State of Washington, a noise impact is identified.



- need the SE Bypass, for congestion is not the largest factor in the economic vitality of Olde Town. Please clarify or remove.
10. There is not a discussion of the City/County Administrations and City/County Councils having the power or will to prevent higher density zoning both adjacent to and south of this project.
  11. Please discuss the potential for future Potential Annexation Areas south of town
  12. Please discuss the cumulative impacts on land use of the Issaquah Highlands, Sunset Interchange, SSPAR, SE Bypass and Park Pointe. The SDEIS has many times discussed the corridor created by this montage of projects. Please discuss how our housing goals, transportation concurrency goals, low income housing goals, etc. have been met with these projects
  13. Also please address how the same group of projects is projected to serve the goals from the Introduction of the Comprehensive Plan:
    - Protect the natural environment
    - Enhance the sense of community
    - Maintain the small town charm, residential neighborhoods, and family atmosphere
    - Plan for a wide range of housing
    - Encourage economic vitality
    - Plan for future growth
    - Revitalize the Central Business District
    - Improve all modes of transportation
    - Maintain the forested hillsides
    - Protect our water source
    - Preserve the Issaquah Treasures
    - Maintain and encourage active community participation and cooperation in planning for Issaquah's future
    - Maintain and enhance quality design and community character
    - Protect the streams and enhance fish habitat, and manage flooding

#### Social Elements:

1. Please discuss the cumulative impacts that large divider roads have on the community of Issaquah. Consider SR900, I-90, SSPAR, SE Bypass and their impacts.
2. Replacing rural trails with sidewalks is not necessarily an improvement. Please discuss this change in facilities and consequent usage.
3. The impacts of a limited access road barrier between Issaquah and Tiger Mountain Recreation Area were not addressed. Please address.
4. There is some discussion in the SDEIS Land Use section of moving Issaquah to a more urban environment. What are the social impacts of pushing Issaquah to this increased urban-ness via this project?

#### Economics:

1. Please include a discussion of how this project is reasonably funded.
2. The amount of increase in stormwater rates for maintenance and operations of this complex stormwater system was not included. WSDOT indicated that their infiltration pond for Sunset Interchange would need to be cleaned yearly! Some of the discussion of the stormwater facilities indicated that an active management system would be necessary. Please include.
3. There was not a discussion of the decrease in home values (Squak, Olde Town) and commercial values (Issaquah Highlands) from views of retaining walls and increased noise. Please include.
4. There was no discussion of the reduced tourist value of easy/appealing access to Tiger Mountain hiking facilities. Please include.
5. Please discuss what happens if City Council votes to build the Bypass and there is no money available.

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Noise impacts are predicted for each alternative for the design year 2030. FHWA regulations (23 CFR 772) specify that when noise impacts are identified, abatement (mitigation) measures must be evaluated. If abatement measures are found to be both feasible and reasonable, then abatement measures must be incorporated into the project design. If an area exceeds 66 dBA, but does not meet both the feasibility and reasonableness criteria, noise mitigation is not required. Noise analysis in the State of Washington must follow WSDOT's policy and procedures document.

Additional garbage trucks from Cedar Hills landfill were not included in the noise analysis. Per WSDOT guidance, noise analysis is conducted within 500 feet of the edge pavement of the proposed roadway. Tiger Mt. High School is more than 500 feet away from the proposed SE Bypass. FHWA's Traffic Noise Model uses traffic volumes and roadway configurations of the project's Build alternative in the year 2030 to predict future noise levels and to assess noise impacts. Per WSDOT guidance, noise analysis is conducted within 500 feet of the edge pavement of the proposed roadway. Increased air traffic is not included as part of the noise analysis. No mitigation is proposed as part of the No-Build alternative.

53. The 2005 Comprehensive Plan identifies several goals and policies related to transportation in the city. The overall vision for transportation in the plan is to "Provide a well-managed transportation system that enables safe and efficient movement of people, goods and services, and supports and complements the City's land use values and goals." The proposed SE Bypass roadway would be one component of the City's transportation system and is intended to meet goals for transportation improvements that would support planned and expected growth in the city. The Transportation Element of the Comprehensive Plan also includes several goals to promote the use of transit and to reduce dependency on single occupant vehicles. The proposed SE Bypass roadway would accommodate use by transit vehicles, bicycles and pedestrians and would thereby meet goals supporting increased opportunities for alternatives to driving.

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This discussion also reflects potential uncertainties about the effectiveness of local land use regulations as they relate to growth management goals in the region. The SDEIS indicates that the SE Bypass has been considered an appropriate land use for its location pending project-specific environmental review. As indicated in the SDEIS, relationships between land use development and transportation continue to be studied.

It is acknowledged that the 2005 Comprehensive Plan no longer contains language from previous plans regarding the SE Bypass project. The proposed project remains an important part of the City's transportation improvement plans and is included in the list of 20-year Transportation Improvement Projects in Volume 2 of the Comprehensive Plan. The Park Pointe project is not dependent on the SE Bypass and has indicated that the development would provide separate access to the proposed site if the City chooses not to build the SE Bypass project.

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The railroad grade has been identified as an informal trail because it is located on property that is not owned or maintained by the City of Issaquah as a recreational facility. The City's 1995 Urban Trails Plan identifies the trail as a proposed project, assigned a low priority for completion. The proposed project would no longer affect the trailhead at 2nd Avenue. Impacts on trails and recreational facilities are addressed in Chapters 3 and 4 of this Final EIS. The proposed project has not been identified as "the largest factor in the economic viability of Olde Town," but is proposed to relieve traffic congestion affecting Front Street businesses in the northwest portion of the Olde Towne sub area.

6. Please discuss the monetary consequences of higher flood risk, hazardous spills and reduced levels of Chinook salmon in Issaquah.
7. What projects could not move forward if City Council chooses the build the Bypass? IE: Where else could that money be spent?
8. What happens if the road goes over budget during construction?
9. Have fines been included for environmental violations in the estimated costs? Please include a listing of costs that show what is included in the estimated costs. Is the cost of including moving the PSE lines included?

#### Displacements and Relocations:

1. There is no discussion of the social consequences of removing long time residents from their homes or taking their property.
2. There is no accounting of how many homeowners will have parts of their property taken. The SDEIS also does not discuss what impacts this will have on their quality of life.
3. There is no discussion about quantities of displacements per home value. For example how many homes are valued at under \$200,000, between \$200,000-225,000, etc.
4. There is no discussion about the quantities of available homes at these same prices, nor a discussion of the current housing market where homes are selling above listed prices.
5. Please acknowledge that displacement of one Habitat for Humanity home and 3-4 rental homes would have disproportionate impacts to low income families. Please also indicate these residents' ability to find comparable housing elsewhere in Issaquah.
6. There are only two Habitat For Humanity homes in Issaquah. Alignments 2, 4 and 6 take one of these. Please discuss how this is supported by the Comprehensive Plan.


#### Conclusion:

With the information given it is clear that none of the alternatives will serve the stated purpose of the SE Bypass. None of the alternatives gives the congestion improvements expected. All of the alternatives except the No-Build alternative have large social, environmental and financial impacts.

There are some that argue that the road will be built in 10 years and that the Issaquah-Hobart corridor will then have to be expanded. If this is the case then NEPA requires that this be clearly stated, that the projects be linked and the EIS include the impacts of the entire project. This would provide the information to make an educated decision if the end goal is expansion of the Issaquah-Hobart corridor. At this point, however, the SE Bypass is being proposed as a "stand alone" road and "shall" be considered on those merits alone to avoid the issue of "segmentation".

The argument is also given that if Issaquah does not complete this EIS to its final form then we will have no "standing". Given the aged information and the uncertain quality of this SDEIS I am certain that Issaquah does not want "standing" using this document.

The No-Build alternative allows Issaquah to stop focusing on an expensive, contentious project that has forced many citizens to put their lives on hold for years. The social strain of this project that remains un-addressed in the SDEIS has had an enormous cost to this town. It is time to stop with the SE Bypass build alternatives. The No-Build alternative is reasonable, low impact and will allow Issaquah to move to design and complete projects upon which we all agree.

Thanks,  
  
 Connie Marsh  
 1175 NW Gilman Blvd  
 Issaquah, WA 98027  
 (425) 392-4908

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54. Secondary and cumulative impacts associated with social elements under Modified Alternative 5 are discussed in Chapter 3 of this Final EIS. It has been acknowledged that existing trail connections would change as a result of the proposed project. Pedestrian and bicycle facilities for the proposed project are intended to allow existing connections to continue. Please see Chapter 3 of this Final EIS for more information on trails and access to Tiger Mountain under Modified Alternative 5. The proposed project is only one of several projects that are leading to higher density development in the city and is reflective of the trend toward more urbanized conditions in the city, but is not "pushing" or otherwise influencing land use decisions to allow additional development within city limits. For more discussion of social and land use impacts, please see the secondary and cumulative impacts section at the end of Chapter 3 of this FEIS.

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55. The final funding package for the proposed project has not yet been determined, but would likely include local, state and federal sources. The local share would be in the range of 14-20%, depending on the grant. Costs for maintenance of stormwater facilities have not been determined, however, these costs are not expected to substantially affect the city budget. Potential impacts on property values were addressed in the SDEIS and are evaluated for Modified Alternative 5 in Chapter 3 of this Final EIS. The proposed project would include sidewalks and bicycle lanes to allow continued access to Tiger Mountain trails. In addition, a new trailhead parking area would be provided just south of East Sunset Way. With continued access and new parking opportunities, the proposed project is not expected to result in adverse impacts on tourist activities related to the use of hiking trails. If a decision is made to build the proposed roadway, funding for construction would be pursued by the city.

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56. With mitigation, the proposed project is not expected to affect floodplains in the project area. Substantial impacts related to hazardous materials spills on the roadway are not expected to occur. Mitigation measures are proposed which are intended to prevent adverse impacts on fish species. City staff determine roadway priorities during the annual update of the Transportation Improvement Program. Presently, the SE Bypass is near the top of proposed improvements. The complete list of projects, including those ranked above and below the SE Bypass roadway is provided in the current Transportation Improvement Program. If initial funding obtained for the roadway is not sufficient to complete construction, additional funding would be sought which could delay completion of the project. Cost estimates are preliminary and include such items as design, materials, paving, and right-of-way acquisition. Potential fines cannot be anticipated and are not included in cost estimates. It is not known whether additional construction costs would apply if it is determined that power lines would need to be relocated as a result of the proposed project.

CITY CLERK'S OFFICE  
JUL 29 2004  
RECEIVED

Mayor

Laura and Robert Foreman  
1105 Greenwood Blvd SW  
Issaquah, WA 98027  
425-392-9732  
[laura.foreman@comcast.net](mailto:laura.foreman@comcast.net)

RECEIVED BY ALL  
COUNCIL MEMBERS

July 25, 2004

Issaquah City Council  
Fred Butler  
PO Box 1307  
City Hall South  
135 E Sunset Way  
Issaquah, WA 98027

Dear Fred Butler,

We have been Issaquah residents for twenty-four years and oppose the building of the proposed Southeast bypass. We moved here because of the natural beauty and the small-town charm of this unique community. We are committed and active participants in Issaquah and over the years we have volunteered our services in various ways: Issaquah's Planning Policy Commission, the Issaquah Historical Society, the Issaquah Environmental Council, volunteering in Issaquah's schools, and coaching Issaquah's children's sports teams.

We have attended Council meetings, written letters and spoken with many council and city officials to voice our opposition to the building of the proposed Southeast by-pass.

Our concerns continue as follows:

- **Noise pollution** – We live on Squak Mountain. The valley acts as an amphitheater. Already we are flooded the roar of traffic from I-90. Truck traffic on the Southeast bypass would bounce off the mountainsides & GREATLY reduce the quality of life
- **Flooding Risks** – We have witnessed a catastrophic failure of the newly built North Spar ability to manage increased stormwater drainage. This threat has not been adequately addressed.
- **Wetland Impacts and Aquifer Risks** – The area where the bypass is proposed to be built is dotted with wetlands critical to maintaining water quality in the city's natural aquifer. Already the city's water quality has been greatly compromised as the City must now chlorinate the water for the first time in its history. Additionally, 95% of wetland mitigation results in FAILURE.
- **Forested Hillsides** – We treasure our views of the forests of Tiger Mountain. There is NO other valley in the Seattle area with this unique and beautiful geography.
- **Wildland Impact** – This project will have an adverse affect on the treasures of Issaquah – its wildlife and fish populations. We are so very fortunate to live in community with other species and it is our RESPONSIBILITY to not destroy their habitat.

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57. The SDEIS identified potential impacts related to the community and relocations in Chapter 3 and these impacts are noted for Modified Alternative 5 in Chapter 3 of this Final EIS. Partial right of way acquisition would occur on several parcels in the proposed project area. The exact number of parcels affected has not been determined, however, estimates of the total amount of land area that would be affected are provided in Chapter 4 of the SDEIS and Chapter 3 of this Final EIS. Proximity impacts are noted in several places in the SDEIS and this Final EIS including discussion of air quality, noise, social elements, and land use. A breakdown of the appraised value of individual homes in the south project area was not provided, however, the average values of these homes is identified in the discussion of displacements and relocations in Chapter 3. The availability of homes in the affected price ranges was specifically discussed and identified in the discussion of displacements and relocations in Chapter 4 of the SDEIS and has been updated for Modified Alternative 5 in Chapter 3 of this Final EIS. Potential impacts on the home associated with Habitat for Humanity and on rental housing were associated with the South C alignment. All residents displaced would be compensated per the Uniform Relocation Act and if they qualified would be eligible for low-income housing in the Habitat for Humanity program as discussed in Chapter 3.

58. Your comments are noted. The proposed project is not intended to result in changes to the Issaquah-Hobart Road and the proposed project's purpose and need does not include expansion of that road. Please see Chapter 1 of this Final EIS.

59. and 60. Your comments are noted and will be considered in the City's decision for this project.

1. It is correct to say that noise can travel from low-lying areas to areas above. However, Squak Mountain residences are located further than one-half-mile from the project area. Residences at this distance would not experience a noticeable change in noise levels from the project. As a comparison, Noise Receptor I is located 250 feet west of the project. Existing and future noise levels at Noise Receptor I are predicted to be 60 dBA for the existing conditions and future conditions with the project. With no change in noise levels resulting from the project at 250 feet, no noticeable change in noise levels resulting from the project are predicted at residences located at least one-half-mile from the project on Squak Mountain.

2. Subsurface soil and groundwater conditions change significantly over relatively short vertical and horizontal distances in the project vicinity, and it is not appropriate to compare conditions elsewhere with the proposed project area. Additional subsurface exploration would be done at the design level stage to determine the design of structural walls in the north project area. In addition, the stormwater failure mentioned wasn't related to the North SPAR, but instead to a temporary infiltration system operated by Port Blakely for the Issaquah Highlands development.

3. A new Wetland Mitigation Plan has been prepared for Modified Alternative 5 and is included with this Final EIS. With mitigation, the proposed project is not expected to have substantial adverse impacts on water quality in the project area. The City's recent action of chlorinating the drinking water supply is not due to any contamination of the water source. Operating a large water system without using chlorine to keep bacteria levels low is very difficult because it required a considerable amount of water line flushing. With the growth of the system and the miles of new pipe it became necessary to start chlorination after testing showed the signs of bacterial growth.

- **Financial Reality** - This road would be less than two miles long and yet is projected to cost almost \$22 million dollars. Historically, actual costs have always exceeded estimates. Currently the City has only \$1.9 million available. As a tax-payer I do not want my taxes used to pay for this road. Neither do I want other projects to be postponed or canceled so that funds can be diverted to pay for this road.
- **Issaquah-Hobart Road** – This is a two-lane road. Traffic will not improve because two lanes from the Southeast bypass, one lane from Front St., and one lane from Newport Way feed into it. To widen the Issaquah-Hobart road would destroy one of the last remaining rural elements of Issaquah
- **Park Pointe Development** – Issaquah has long-ago met its demand for “urban villages.” We have the Talus complex (complete with soon-to-be-built 9-story building) to the west on Cougar Mountain as well as the huge Highland complex at the north end of town. Over the last 15 years the valley floor has been filled with apartments and shopping centers. **ENOUGH!!**

The following is taken from Issaquah's Vision statement:

The City of Issaquah has had a long-term commitment to the environment. It is one of the City's core operating values. The City implemented the Issaquah Creek Basin Plan in 1995. In addition to working on what were severe flood issues within the downtown area, the plan highlights important creek protection and restoration goals, and actions.

The following is your own vision statement for the City of Issaquah:

A city that places a high priority on the environment retains its small town charm, and where residents feel safe and good about where they live.

Please keep “a high priority on the environment” in order that Issaquah “retains its small town charm, and where residents feel safe and good about where they live” Please remember the reasons you have chosen to live here rather than Seattle, Bellevue, Kirkland or Redmond. Please don't let Issaquah's beauty be paved over by yet another road and further developments.

Sincerely,

*Laura Foreman*  
*Robert C. Foreman*

Laura and Robert Foreman

4. The City has received your letter and appreciates your input.

5. The preferred alternative, Modified Alternative 5, is the only alternative that meets the purpose and need for the project while minimizing identified impacts, both natural and socio/economic elements. Mitigation for unavoidable impacts that may occur to wetlands is described in the Wetland Mitigation Plan in this Final EIS.

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6. It is unlikely that the cost of this project would be borne solely by City taxpayers. Most transportation improvement projects are funded primarily by state and federal grants. The SE Bypass would actually be considered a small project when compared to the cost of other projects both locally and regionally. Currently the Washington State Department of Transportation 2005-2007 budget for capital improvements is \$3.3 billion, and a \$18 billion bond issue for the Regional Transportation Improvement District (RTID) is up for vote in late 2007. The estimated cost of the SE Bypass would be around \$40 million.

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7. The proposed project is not intended to expand Issaquah-Hobart Road which is located south of the proposed project limits in King County. King County does not plan to widen the Issaquah-Hobart Road at this time, but the County may evaluate traffic congestion on that roadway at some time in the future.

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8. Your comments have been noted and will be considered in the City's decision for this project.

Issaquah City Council  
P.O. Box 1307  
Issaquah, WA 98027

July 21, 2004

Dear Issaquah City Council Members: Nancy Davidson, Fred Butler, Bill Conley,  
Russell Joe, Joe Forkner, David Kappler, and Hank Thomas,

As commuters who use both Hobart Road/Front Street and Highway 18 as routes from our Tiger Mountain Road home to I-90, we are writing to let you know that we are opposed to the proposed Southeast Bypass and believe that other solutions would better serve both commuters and Issaquah businesses and residents.

The proposed SE Bypass is too damaging to the environmental and to the look and feel of Issaquah to be a route worth considering. Although it would not be in our backyard, it would rob the region of a valuable aquifer recharge area and seriously degrade the basin in terms of noise, air quality, and visual appeal.

It seems to us that the city should implement as many other traffic mitigations as possible—synchronized lights, use of Second Street and Sunset to the Interchange—and urge the county to complete Highway 18. We, and fellow commuters we know from this area, would much prefer taking Highway 18 to I-90 if Highway 18 were completed. The SE Bypass, which just moves the bottleneck to Hobart Road while ruining Issaquah, is a bad idea.

We like to shop in Issaquah, frequent its restaurants, and go for hikes along trails behind the high school. The SE Bypass would do much to degrade the town's appeal. In an age where money seems to out-shout the interests of the people, we look to you as city council members to act with integrity in preserving the city's natural resources and quality of life.

We appreciate your consideration.

Sincerely,

*Mark McWiggins*

*Kate McWiggins*

Kate and Mark McWiggins

27028 SE 170th St. (Tiger Mt.)

PO Box 1690

Issaquah WA 98027

RECEIVED  
JUL 30 2004  
PUBLIC WORKS ENG.  
CITY CLERK'S OFFICE

JUL 29 2004

RECEIVED

COPIED TO ALL COUNCIL MEMBERS

*Mayor  
City Clerk  
Bob Brock*

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2

1. Your comments have been noted and will be considered in the City's decision for this project.

2. Mitigation measures are considered for the No Action alternative in the SDEIS. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but these alternatives are not reasonable because they are not effective in reducing congestion.

July 16, 2004

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JUL 30 2004

PUBLIC WORKS ENG.

CITY CLERK'S OFFICE

JUL 29 2004

MAYOR  
CITY CLERK  
BOB BROCK

COPIED TO ALL COUNCIL MEMBERS

Dear Issaquah City Council Members,

RECEIVED

We are residents of Issaquah living on Cougar Mountain. Our daughter attended Issaquah High School, and we do most of our shopping in Issaquah rather than in Eastgate or Factoria. We like coming to Issaquah because it still has a feeling of being our town, with the library, Village Theater, (yes, we do use Costco) and particularly its wooded foothills leading up Tiger Mountain.

We feel that the proposed Southeast Bypass would ruin Issaquah completely, environmentally, visually, and as a town that still has some uniqueness and charm. This particular route, cutting into the forested hillside, should have been dropped from consideration long ago, with energy invested instead in alternative solutions such as the uses of Second Avenue and Newport Way. Here you would have less cost to both the environment and the purse strings of the city and its citizens.

We want to speak out as city residents who simply want to make our choice known. That proposed road along that hillside cannot be worth it.

Thank you for your consideration.

Sincerely,



Jim Deller  
Jeanne Deller  
4235 164<sup>th</sup> SE  
Issaquah, WA 98027

1

1. Your comments have been noted and will be considered in the City's decision for this project.

2

2. Mitigation measures are considered for the No Action alternative in the SDEIS. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but these alternatives are not reasonable because they are not effective in reducing congestion.

COPIED TO ALL COUNCIL MEMBERS

Issaquah City Council  
P.O. Box 1307  
Issaquah, WA 98027

CITY CLERK'S OFFICE

JUL 29 2004

RECEIVED

RECEIVED

JUL 30 2004

PUBLIC WORKS ENG.

340 SE Clark St.  
Issaquah, WA 98027

July 26, 2004

MAJOR  
CITY CLERK  
DOB ARICK

Dear Issaquah City Council Members,

I am writing with regard to the proposed Southeast Bypass. As a resident of Issaquah for six years, I am very much a part of this community. I live, work, and shop in Issaquah. I am opposed to the SE Bypass and ask that you as council members drop this project, which is a poor one for traffic and a ruinous one for our quality of life.

As citizens and voters we have entrusted you with the protection of quality of life here and with keeping Issaquah's "treasures," its clean waters and air and its signature forested foothills. The SE Bypass would destroy all of these leaving instead concrete walls standing like a badge of shame to the short sightedness of those who would sacrifice this for insignificant gains. Is this a project foisted on us in order to pay for a road to Park Pointe development?

The proposed SE Bypass just moves the bottleneck to Hobart, and it pours more traffic into the basin. There are so many alternatives, such as the use of 2<sup>nd</sup> and Sunset to the new interchange and coordination of traffic lights. Use these while working with the county on a truly creative solution. We need transit on Hobart Road and the completion of Highway 18.

Keep our forested foothills. Preserve Issaquah's treasures. And work with the county on a real solution. Thank you.

Sincerely,



Cindy Creel

1

1. Your comments have been noted and will be considered for the FEIS.

2

2. As discussed in the CP3 document, the Park Point Development is not dependent on the project nor are there any other projects in the planning or permitting process that are reliant or anticipatory of the SE Issaquah Bypass.

3

3. Your comments have been noted and will be considered in the City's decision for this project.



Issaquah City Council  
P.O. Box 1307  
Issaquah, WA 98027

CITY CLERK'S OFFICE

COPIED TO ALL COUNCIL MEMBERS

July 25, 2004

Dear Issaquah Council Members,

We have lived in Issaquah for more than ten years. We came here for the beauty of the forested hillsides and the easy access to Tiger Mountain trails, where we spend a great deal of our time. We are opposed to the proposed Southeast Bypass. It would destroy everything that gives Issaquah its beauty and attraction. It would also destroy precious wetlands and woodlands that put fresh water into our wells, absorb noise, and provide wildlife habitat.

We don't believe that the proposed bypass is for the greater good (especially considering the desires of Park Pointe developers), and we do not believe that it is a good traffic solution. Please use every alternative while working out a real solution. We are asking you, our elected council members, to help Issaquah retain its character and values, and to keep Issaquah a place with fresh water, air, and its forested "gateway to the Issaquah Alps"

Sincerely,

*Elizabeth Gallagher*  
*William Gallagher*

William and Betty Gallagher  
335B Clark Street  
Issaquah, WA 98027

MAYOR  
CITY CLERK  
BOA BRACK

RECEIVED  
JUL 30 2004  
PUBLIC WORKS ENG.

1

1. to 2. Your comments have been noted and will be considered in the City's decision for this project.

2



**Pam Fox**

**From:** Carolyn Sygitowicz  
**Sent:** Thursday, July 08, 2004 2:05 PM  
**To:** Pam Fox  
**Subject:** FW: South East Bypass

-----Original Message-----

**From:** TONY SCHAFF [mailto:tony\_schaff@msn.com]  
**Sent:** Wednesday, July 07, 2004 12:47 PM  
**To:** MAYOR; Bill Conley; David Kappler; Fred Butler; Hank Thomas; Joe Forkner; Nancy Davidson; Russell Joe  
**Subject:** South East Bypass

When our schools, water, air quality, property values, noise, potential flooding, and environmental concerns are properly addressed, how can you possibly vote anything but **NO** on the S.E. Bypass?

Please vote **NO!**

Tony and Phyllis Schaff  
375 S.E. Bush St.  
Issaquah, WA 98027  
tony\_schaff@msn.com

- |   |  |
|---|--|
| 1 | 1. The City has received your letter and appreciates your input. |
|---|--|

7/8/2004

RECEIVED  
JUL 21 2004  
PUBLIC WORKS ENG.

Dear Mr. Brock:

How is it that in this day in age we are having a conversation about further deteriorating our quality of life in Issaquah? We have tragically seen the destruction of one "small town" after another in the pursuit of convenience and progress. I am concerned about habitat, the aquifer, students, and noise. The potential for our peaceful Alps to be changed forever is staggering. Why can't we just say no? Spend the money on a more environmentally friendly, less costly solution. If we build it they will come. Issaquah will be providing commuter convenience on our dime.

Sincerely KC Frost  
Issaquah

201 MT PARK BLVD S.W.  
ISSAQUAH, WA. 98027

1

1. The City has received your letter and appreciates your input.

RECEIVED

JUL 21 2004

PUBLIC WORKS ENG.

Mr. Brock:

At Issaquah Middle School we have a class that teaches us about wildlife. They learn about plants and animals on Tiger, Cougar, and Squawk Mt. Then they take a hike. They have seen deer, fox, coyote, and an assortment of plants. I would have loved to be in this class but since it is an elective you have to choose it to get in. It turns out the class was too full to fit in anymore students. I know you are considering putting in a highway that will cut through the Mt. and go over the high school. If so think about the animals reaction. They will probably be pushed farther back into the forests. That means on our hikes we might not get to see the animals we learned about. It will cut down trees and kill the squirrels and chipmunks that live in them. It will force animals with ranges to move into each other's and limit their living space. With that many carnivores living in a smaller space prey may become more scarce or if not the prey may eat so much vegetation it could kill of some species of plants. If you don't care about the wildlife than, what about your citizens. We like our views and small stores. If we have a freeway people might come here more and endorse big franchises not small, local businesses. That would put some people out of a job. When we got to high school instead of looking up at a blue sky we will see a huge highway. When I go on freeways I see a lot of trash. Nobody wants to see that come here. I am sure there are many good points to having this bypass but I don't think they are worth the sacrifices that would be made. We might hurt wildlife, we might hurt our citizens, we might hurt the environment, and we might hurt our town. The Southeast Bypass will not necessarily hurt our lives but it might. Are you willing to take that chance?

Christina Frost

201 MT PARK BLVD SW.  
ISSAQUAH, WA. 98027

1

1. With mitigation measures, Modified Alternative 5 is not expected to have substantial impacts on wildlife species in the area. The City will also initiate and contribute monetarily in a study and planning effort that will address regional wildlife connectivity issues.

2

2. Your comments are noted. Mitigation measures for Modified Alternative 5 are identified in Chapter 3 of this Final EIS and are intended to avoid or reduce impacts on the natural and social environment.

Dear Council Member:

How is it that in this day in age we are having a conversation about further deteriorating our quality of life in Issaquah? We have tragically seen the destruction of one "small town" after another in the pursuit of convenience and progress. I am concerned about habitat, the aquifer, students, and noise. The potential for our peaceful Alps to be changed forever is staggering. Why can't we just say no? Spend the money on a more environmentally friendly, less costly solution. If we build it they will come. Issaquah will be providing commuter convenience on our dime.

Sincerely KC Frost  
Issaquah

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JUL 30 2004  
PUBLIC WORKS ENG.

1

1. The City has received your letter and appreciates your input.

RECEIVED

JUL 30 2004

PUBLIC WORKS ENG.

George Comstock  
1101 Lewis Lane SE  
Issaquah, WA 98027

Robert Brock  
Public Works Director  
City of Issaquah Public Works Department  
1775 12<sup>th</sup> Avenue NE  
Issaquah, WA 98027

July 29, 2004

Re: Comments to 2004 Southeast Issaquah Draft Supplemental Environmental Impact Statement

Mr. Brock:

This letter serves as a comment on the June 2004 Southeast Issaquah Bypass Draft Supplemental Environmental Impact Statement and Section 4(f) Evaluation (DSEIS). I have the following requests for the Final SEIS:

1. Please revise the formal Purpose and Need statement to reflect that there are three existing interchanges, not two as stated on page 1-1 of the DSEIS.
2. Please update the Traffic Analysis to tabulate the LOS and traffic volumes for the traffic study area assuming SR18 widening to four lanes combined with synchronizing traffic signals, but not including the construction of the SE Bypass, for both 2005 and 2030.
3. Table 4 of the Transportation Technical Report (page 14 of Appendix F) does not include the widening of SR 18. Please include this assumption in the modeling for 2030.
4. Page 14 of the Transportation Technical Report suggests that no field observations were made of the traffic subsequent to the opening of the Sunset interchange. If this is the case, please conduct field observations and verify the model for 2005 and 2030 traffic conditions.

Sincerely,

  
George Comstock

1

1. The two interchanges referred to in the purpose and need statement are the Front Street and SR 900 interchange. Improvements to the Sunset Interchange were provided through a separate project and therefore evaluated under separate environmental review.

2

2. Please refer to the SDEIS Appendix G, Transportation Technical Report, for a discussion on potential impacts of widening SR 18. Additionally, when the project was initiated, the Sunset Interchange was under construction; therefore the most current data available at the time was used for existing conditions.

Alastair and Elizabeth Brewer  
1065 6<sup>th</sup> Ave SE  
Issaquah, WA, 98027

July 30, 2004

Bob Brock  
Public Works Director  
City of Issaquah Public Works Department  
P.O. Box 1307  
Issaquah, WA 98027

Dear Mr. Brock:

We are against the building of the Southeast Bypass since it does not fulfill its purpose as stated in the DSEIS. By spending millions of dollars, the city's intention is to decrease traffic on Front St. South. However, due to the current congestion of I-90 and the failing Issaquah-Hobart Road, the Bypass will only succeed in attracting more cars from other areas in Issaquah, South King County, and the proposed Park Pointe development. Because of already existing back-ups on Issaquah-Hobart Road and I-90, this will only lead to multiple congested roads in historic downtown instead of decreasing congestion on Front St. South.

We moved to downtown Issaquah seven years ago due to its "small town" feel, gorgeous views and easy access to trails in the Issaquah Alps. We are so disappointed to see the Issaquah Alps marred by large development projects. The Issaquah valley, the last pristine area in our city, is fragile since it supports our drinking water and endangered fish species in the Issaquah Creek. It is frustrating to see a decrease in our water quality by mandated chlorinating due to overdevelopment.

We treasure our closeness with nature by living in a wildlife corridor and habitat for bear, coyote, owls, rabbits, eagles, heron, woodpeckers, etc.

When we drive through other Eastside cities, the "eye catchers" are roads, concrete, stores, and large developments. It is comforting to drive into Issaquah and see the beauty of Tiger Mountain. If the Bypass is built, even this area will be scarred and Issaquah will resemble a "drive-through" city like Factoria. Destroying the mountain for 1.2 miles of pavement can never be undone. The damage will be permanent and Issaquah will never be the same. We need to preserve the environment for our drinking water and wildlife and hold onto the last area with charm.

Because of asthma, we cannot live near a major roadway. The air pollution created by the bypass compounded by the air being trapped in our valley will force us to leave our house with Alignment C. In addition, the dust, noise and vibration created by construction of Alignment C and Wetland Mitigation area adjacent to our property, will leave our house uninhabitable. As we drive by many road projects in Issaquah and the plateau, clouds of dust fill the air and cause my chest to tighten; the same dust that is supposed to be controlled by construction mitigations.

With Alignment C, we fear an increase in flooding and landslides due to construction of the Wetland Mitigation area, proposed Park Pointe development, and overflow of storm water ponds into the North Tributary. Our fears are not unwarranted since we have witnessed similar issues with the construction of the North Spar. The cause of that landslide onto the I-90 on-ramp still has not been fully understood.

At a much less cost, traffic alternatives such as synchronizing lights, adding a right turn lane to 2<sup>nd</sup> Ave. and Sunset, creating an I-90 underpass, increasing transit, and encouraging use of highway 18 can be done. The studies completed in the DSEIS use 2000 existing conditions and therefore do

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1

1. Modified Alternative 5 is intended to meet the proposed project purpose and need to reduce congestion on I-90 interchanges and on Front Street by diverting traffic away from existing congested city streets.

2

2. The proposed project is not intended to harm the local community, vegetation, water quality or wildlife. Mitigation measures for potential impacts resulting from the proposed project are identified in Chapter 3 of this Final EIS.

3

3. and 4. Modified Alternative 5 was chosen as the preferred alternative because it has impacts that can be effectively mitigated. The other build alternatives considered in the DSEIS would have impacts considered unacceptable to the community..

4

5

5. Your comments have been noted and will be considered in the City's decision for this project.

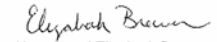
● Page 2

July 30, 2004

5

not acknowledge the decrease in congestion on Front St. South due to the opening of the Sunset Interchange. We acknowledge that traffic is an issue but it is also a common one in any Eastside city. We do not want to see millions spent on a road that will fail in 5 years or less and permanently damage not only Tiger Mountain, but the quality of life in this last area of Issaquah with "historic charm."

Sincerely,



Alastair and Elizabeth Brewer

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JUL 30 2004

PUBLIC WORKS ENG.

July 29, 2004

City of Issaquah  
Attn: Mr. Robert Brock  
Public Works Director  
P.O. Box 1307  
Issaquah, WA 98027

Dear Mr. Brock:

I am writing you to voice my concerns about the Issaquah bypass, the Environmental Impact Statement options, and the (SEIS) Committee that will determine the public's fate in this matter.

First of all, your decision on this issue has such a far-reaching and greater impact than many can realize. I am asking that you please hear my voice and take the time to read, review and discuss some of my concerns as I am so discouraged by "Committees" that are supposed to "hear" the public's views—and when in reality—they often times have their OWN agendas and exist only to "soothe the savage beast"—which are the people most affected by the proposal.

- Putting in this "bypass" will go hand-in-hand with growth, with growth will come the rest of the ever-increasing demand for land and resources—where will it stop—when will we try to do something proactive—and give something back to the land!
- Money can't buy back health—homes that have been established, tracks of land that will be ruined, sold, sacrificed —"all in the name of the BYPASS"!
- Why is it that corporations/groups that benefit never pick up the real costs or consequences that go along with urbanization or so called "improvements?" They initiate/demand action on problems THEY created in the first place by bringing in more companies, more houses, more people, cars, crime, more auto accidents... When is too much, too late! Why do WE residence/homeowners have to be the ones to be sacrificed? If it were affecting your neighborhoods—I can bet you would be writing this letter.
- You have already destroyed the original quaint town of Issaquah by building the most unnatural building structures. The Front Street stores looks like a circus town. Please do not ruin the rest of the Issaquah Hobart Road ---it is the best thing you have left (besides the Salmon Hatchery)...Wetlands and forests areas need to be preserved and

1

1. Your comments have been noted and will be considered in the City's decision for this project.

2

2. Mitigation measures for potential impacts resulting from the proposed project are identified in Chapter 3 of this Final EIS.



set aside for wildlife—stop pushing the animals off the land—remember they are not trespassing—we are! ***This is their home too—people still think they own all of it!***

- If the City of Issaquah and your committee members are confident in your decisions are you willing to accept the **consequences of your decisions!** Think about it—you risk nothing, except profit and business deals for increased revenue/budget if you put in this Bypass without considering better options for the residences—will you be willing to personally take responsibility and be accountable for the damage to the environment (trees, wildlife, air, and water) today and in the future?

Once you make that decision, it is irreversible—for the “good—bad—or indifferent” solution for Issaquah! There is no turning back. I am hopeful you will take the time to weigh all the viewpoints, solutions/options to make an unbiased, fair decision to ALL that will be affected—especially to the homeowners, who will ultimately pay the price—not only in property/homes lost, but enjoyment of what they have accomplished to build their home—cannot be replaced by putting up such a bypass. Our ever-dwindling natural resources will one day be depleted. Our air, water, soil will only be AS GOOD as WE CHOOSE to respect the land we live on.

Can this Committee say that if THEY would be willing to build the bypass in their back yards, and can they **ABSOLUTELY** say that they will NOT have ever-increasing pollution, cancer rates, over-crowdedness, more buildings/construction, more crime, and more noise pollution—the list goes on and on and on! You are welcome to have that where **YOU** live and the “possible” cancer risks that comes with increased air pollution.... I guess that is why they are building more barriers/high walls between the freeways and residential homes—hoping this will stop the excess noise and pollution from coming OVER those walls!

Part of this whole “Public Hearing” problem is that the committee who makes the decisions already has a special interest in the outcome! There are about 70% opposed to the “bypass.” If even a small part of these individuals were allowed to be on this Committee, the decision may well be different. WE have to live with YOUR decision not the other way around. Please, please do not let our concerns fall on “deaf ears,” especially when WE are the ones that stand to lose the most!

I am not benefiting from this--nor are a lot of other people--I am actually the loser in all this--because I know that the farm I have loved for so many years will slowly deteriorate as other areas from overbuilding.

I come to Issaquah to get away from all the concrete--not to see more of it brought in! You may not be worried about the future--because you will not have to deal with it once we pass

2

2. Your comment is noted and will be considered in the City's decision for this project.

3

3. Your comments have been noted and will be considered in the City's decision for this project.

through this life. We can just keep pushing farther out and away from the cities until there will be no where we can turn to get away from the man-made world we have created--no where we can breath--AND people will still take more land away from the natural habitat, just to put up one more bypass---one more housing development--one more mall! I have seen this happen in so many areas--Kirkland is a good example. *In Juanita, even the geese were forced to leave and, I hope, they left voluntarily!*

You bet I am upset---I am upset because I live in Kirkland and have to come to Issaquah--where I can find peace, quiet, country, fresh air to breath, and be with the animals! If traffic is getting too overbearing--then maybe that is a signal for the community to stop building! Does the sky have to fall before you look up and take notice?

What can Issaquah do to be different, show the other areas that Issaquah can make ends meet and still keep some of the nice quaintness that has made Issaquah a place where people are proud to have set their roots up years ago, raised their families? Where people have chosen to live rather than in places like Renton, Kent, Auburn, where the urban squall is so evident--one McDonalds, two McDonalds, three McDonalds and more...Walmart, Fred Meyer, ...when will enough be enough before it is ALL paved, and we lose the natural beauty that makes Issaquah a special and enjoyable place to live. Putting up a bypass is just the start of this irreversible process.

Do you as a Committee who will determine our fate care enough to be FAIR, responsible and, yes, even grateful for what we already have in LIFE---to be Pro-Life, even if it will NOT mean lining more money in the Issaquah's budget or getting a pay raise? One day, no matter how much money you generate---how big a budget you have for projects---you may never be able to undo the damage that has been done to the community. It's about doing the "right thing" not the profitable, political thing that will benefit this area.

I say, NO Bypass--look at the alternatives, options and just try to stop the builders from over-building! (That means being responsible for what licenses you issue--each City department should be accountable!)

You may ask, why I am writing you since I do not directly live in your area---That is because I live in an area that has been affected by traffic, pollution, crime, over crowdedness---what more cars bring in! Every time I go to visit Issaquah, I lower my blood pressure and my ulcer feels better--it is like vacation for me. I do not want to see the area change overall. Yes,

4

4. Several alternatives were reviewed and rejected during the initial screening process for the proposed project. Please see Chapter 2 of this Final EIS for a summary of alternatives screening and the selection of Modified Alternative 5 as the preferred alternative.

City of Issaquah  
Mr. Robert Brock  
June 29, 2004  
Page 4

there can be a few more eating establishments, stores, but no bypass, no roadways to bring more traffic into this area.

Improve the resources you do have—the Zoo, Salmon streams, education, hatchery facilities, help improve the community, BUT DO NOT BRING MORE POLLUTION INTO THIS AREA. Not only animals are affected by pollution...and that is a travesty in itself, but humans are too!

If I have been up-front with you it is because it is a very important decision you have to make and one in which we have to live with what only a few people are given the privilege to decide/recommend for many people **and it is important that we get it right the first time!** The past mistakes are very evident, as well as good decisions. Have you really made a good faith effort to look at all the OPTIONS closely or made every effort to research what other communities have adopted (even out-of-state)—what will impact the area the least and not be just a short-term solution.

Look to see what you can do to correct the problem—not find short-term fixes. You know the environmental impact and concerns for building a Bypass—would it be so terrible to just be satisfied with what you have, do without building a bypass, and utilizing the funds to improve/give back to the natural resources of Issaquah.

**PLEASE, NO BYPASS! Find another alternative!**

Respect for our Environment and concern for our Habitat!

Sincerely,



Lillian Park  
12009 – 100<sup>th</sup> Avenue NE, #4  
Kirkland, WA 98034  
(425) 820-8310

cc: "Bypass" Hearing Committee

5

5. Your comments are noted. The proposed project is not expected to adversely affect air or water quality in the project area. Please see Chapter 3 of this final EIS for more information on potential impacts under Modified Alternative 5.

6

6. Through a long technical process the preferred alternative identified for the Southeast Issaquah Bypass project is Modified Alternative 5 as identified in Chapter 2 of this Final EIS.

7

7. The City has received your comment and appreciates your input.

July 28, 2004

RECEIVED  
JUL 30 2004  
PUBLIC WORKS ENG.

Mr. Robert Brock  
Public Works Director  
City of Issaquah  
P.O. Box 1307  
Issaquah, WA 98027

Dear Mr. Brock:

The SEIS is a real "piece of work". . . and the reason why no one is buying it is that it is incomplete—It is an unfinished work. Only a work in progress, many more questions to be answered, many more chapters to complete much more paint to add. As an artist and a 20-year resident of Issaquah, I look at the base of the Issaquah Alps in many different times of the day and in many different lights. Oh sure, if this bypass is built, we can wear ear pieces to save us from the noise, we can request water when we run out, and we can order breathing protection for our children, but we will never be able to replace the lost visual impact.

Please spend another \$4 million on more studies to answer all the questions and concerns of the people of Issaquah. Only then to come to the conclusion that not one shovel of dirt should be lifted and the only option for the city and our citizens will be the "NO BUILD" option.

  
Camille Vonnegut Brusaschetti

10010-238<sup>th</sup> WAY SE  
ISSAQUAH, WA. 98027  
425-392-5304

1

1. Your comments have been noted and will be considered in the City's decision for the project.

Rick and Linda Reininger  
16311 252<sup>nd</sup> Avenue SE  
Issaquah, Washington 98027  
425-392-4447

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JUL 30 2004  
PUBLIC WORKS ENG.

July 30, 2004

Mr. Bob Brock,  
Public Works Director  
City of Issaquah  
PO Box 1307  
Issaquah, WA 98027

RE: Southeast ByPass – SEIS Comment

Dear Bob,

As a resident of 20 years in the Issaquah Creek Valley and after much thought through the years, we feel compelled to write and express our thoughts regarding the proposed Southeast ByPass, its Draft SEIS and connection to the new Sunset Interchange.

In 20 years, we have seen morning commute traffic along the Issaquah Hobart Rd. build from a mere 6-8 car back up at the intersection of Front St. and Newport to solid back ups at the intersections of Issaquah Hobart Rd. and Cedar Grove Rd. On occasion, it has backed up to our access to the Issaquah Hobart Rd. at 252<sup>nd</sup> Ave. SE – 6.2 miles south of I-90.

We have listened to the proponents and opponents and read the pros and cons of constructing a ByPass. After hearing and reading the information we understand following as fact:

- no county funds for improvements to the Issaquah Hobart Rd. south of Issaquah,
- bumper-to-bumper back ups or road failure occurs daily during the northbound morning commutes and southbound evening commutes between Sunset intersection and the May Valley intersection for the entire distance between these intersections,
- no relief of the “no build” traffic non-concurrency in the May and Issaquah Creek Valleys if the Southeast ByPass is constructed,
- 6:30 AM school bus pick up time for Maywood Middle School and Liberty High School are required because of the road back-ups and intersection failures for the 7:30 AM school start
- minimal new housing development has occurred in the Issaquah Creek and May Valley Rural areas.

Thus, neither of us can support the City or the County in an effort to construct a Southeast ByPass as proposed in any of the alternatives in the Draft SEIS.

Simply, there have been no new roads and only one improvement (expansion of the Maple Valley Highway from 2 lanes to 4 lanes between 140<sup>th</sup> Way SE and the Jones road) to the roads leading north and west from Maple Valley, Ravensdale, Cumberland, Lake Sawyer, Covington and Enumclaw in the past 35 years. This no new road policy has been the norm for 35 years (since I have lived in King County) despite county and state encouraged high density development in all of these south county areas. In addition, there has been little increase in public transportation and Park and Ride development in Maple Valley since the first Park and

Ride lot was created at Highway 167 and Highway 18 some 20 years ago. Bus service to Maple Valley is non-existent from my perspective and a once existing light rail corridor is forever slowly being somewhat converted to a bike trail.

Adding more traffic to the already failing southbound single lane of the Issaquah Hobart Rd. by the addition of two more south bound SE ByPass lanes will only exacerbate the already failing road system. As an example, I can ride my bike the six miles home and pass traffic in either direction as it sits at a stand still and still have the same commute time as if I drove my car!

It seems the only reasonable solution is to improve the traffic flow through Second Ave. to the Sunset Interchange and explore other vehicle connectivity routes such as a continuation of Second Ave. to Gilman over Issaquah Creek and a third I-90 underpass or overpass. Plus, provide expanded Park and Rides and bus service in Maple Valley. Why not build a Park and Ride on WSDOT land at the Highway 18/Issaquah Hobart Rd. intersection?

While it appears the public sentiment is for a “no build alternative” and transfer of funds towards the completion of Highway 18 – 4 lanes to I-90 (which we both fully support) or other local Issaquah improvements, there is another possibility which I’ve not heard discussed.

This other alternative is; make the Southeast ByPass a one way, one lane with bike path north bound right-of-way from existing 6<sup>th</sup> Ave./Issaquah Hobart intersection north to the new Sunset Interchange along the existing PSE power lines and a preferred ByPass alternative route. The advantages could be:

- one lane maintains traffic concurrency with the already failing northbound Issaquah Hobart Rd.,
- allows traffic to go either directly to I-90 or travel through town to buy goods and services from retailers,
- eliminates the need to evict residents from their homes,
- significantly reduces the environmental impact, clearing, grading, retaining walls etc,
- reduces air pollution in the valley,
- minimizes impact to the Issaquah High, Clark Elementary and the Sportsmen’s Club,
- reduces the need for expensive traffic signals and intersections,
- easier pedestrian crossings that are much less intimidating,
- reduces project cost and allows funding of other well needed traffic flow projects within the City,
- does not add more contributing traffic lanes to the already failings southbound lanes of the Issaquah Hobart Rd. during evening commutes and
- improves overall arterial connectivity.

It is our sincere hope that a solution can be found that does not create more hardship on the residents of Issaquah or those of the Issaquah Valley but, that a solution can be implemented to improve the traffic flow for all. It is quite ridiculous when a 6-8 minute drive (obeying the speed limits)/environmentally efficient drive, turns into a 30 minute air polluting stand still.

Please let us know if there is anything else we can do or offer to improve this unfortunate and on-going condition.

1

1. and 2. Your comments are noted. Please see Chapter 1 of this Final EIS for the purpose and need the proposed SE bypass roadway is intended to address and Chapter 2 for alternatives to the project that were considered previously. The proposed project would be only one of several actions the city may implement to address traffic issues throughout its jurisdiction.

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3. Your comments have been noted and will be considered in the City's decision for this project.

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4. As a result of previous environmental reviews, Modified Alternative 5 has been selected as the preferred alternative for the proposed project. As indicated in Chapter 1 of this Final EIS, this alternative is intended to reduce congestion on Front Street and at local interchanges.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rick Reininger".

Rick and Linda Reininger

cc: Mayor Ava Frisinger  
Leon Kos  
Fred Butler  
David Kappler  
Joe Folkner  
Russell Joe  
Bill Connely  
Nancy Davidson  
Doug Mattoon  
Hank Thomas  
Executive Simms  
David Irons  
Joni Earl



Bob Brock  
Public Works Director  
City of Issaquah  
POB 1307  
Issaquah, WA 98027

July 28, 2004

**SE Issaquah Bypass  
Draft Supplemental Environmental Impact Statement Comments**

What Issaquah needs is more transit service & better connected bus routes, a third I-90 crossing, and additional Olde Downtown Issaquah parking. What it does not need is the SE Issaquah Bypass, 1 mile of 4 lane road that feeds into a 2 lane road. Issaquah does not need to provide a "free" access road to a proposed development (read "free to the developer", not the tax payers in this community).

Issaquah does not need 660 new units of uniformly banal architecture crammed at the base of Tiger mountain. (Much less the additional traffic 660 more residences will spew onto the roads of Issaquah.)

Preferred Bypass Alternative #6's costs are based on decade old dollar values—and already is over budget. It also does not adequately address air quality (we've already got smog) and noise levels (if removing trees for the new high school parking lot has already significantly increased the "hear-ability" of the traffic sounds from 2<sup>nd</sup>, I-90, & E. Sunset, what will clearing a much larger portion of the trees from I-90 to Issaquah-Hobart do to noise levels?).

Preferred Bypass Alternative #6 does not adequately address impacts to the environment or the ecology of the areas affected should it be built. Decade old data is not sufficient for current day decision-making.

Preferred Bypass Alternative #6 requires a business (The Issaquah Sportsmen's Club) to use the proposed Park Point development to gain access to its property. That is absolutely unacceptable. If the bypass is built, the Issaquah Sportsmen's Club must be provided its own separate access to its property. Park Point hasn't even been built, how can another business use non-existent roads for access?

And why assume a privately owned development would allow a different business and it's customers to use their residences streets for access?

Preferred Bypass Alternative #6 provides an animal "underpass". How will the wild animals know to use it? Will they be notified by a city representative? Will signs be posted? And if so how will they be written? Scent? Will there be predator and non-predator hours of use? How will that be enforced? And where exactly are the critters suppose to "underpass" from and to? From proposed Park Point to the high school football field? This provision is absolutely ridiculous in concept.

SEIS Comments Lori Laughren

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1. Park Pointe Development can be built with or without the SE Issaquah Bypass Project. In 2004 the City Council changed the zone from "Urban Village" to "Low Density Residential". The maximum number of units that can now be built is 356. The Park Pointe Development can build via local street access and is not dependant upon the Bypass for their access.

2

2. Air quality and noise issues are addressed in Chapter 3 of this Final EIS.

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3. Alternative5 now called Modified Alternative 5 is the preferred alternative carried forward in this FEIS. /Modified Alternative 5 is not expected to have an adverse impacts on the Issaquah Sportsmen's Club.

4

4. The proposed bridge over the North Tributary and Wetland GW would provide wildlife clearance for small mammals. The wildlife crossing near the Issaquah Sportsman's Club was eliminated because existing fencing on private property in the area would make this crossing ineffective. Recognizing that more needs to be understood regarding the migration patterns of the large mammals between Tiger and Squak Mountains, the City agreed during the CP3 issue resolution process to participate monetarily and help initiate a study and planning effort that addresses regional wildlife connectivity. The City also agreed to facilitate a discussion during the project design stage with WSDOT through an inter-agency request to evaluate maintenance needs at existing wildlife crossing on I-90 in coordination with WDFW and USFWS. Wildlife signage, as determined appropriate, would be provided along the roadway corridor to warn drivers of the potential for encountering wildlife.



Issaquah needs to retain what's left of its wild spaces as is, so that the community in the future can experience the wonders and treasures of the Issaquah Alps as we do now. Here at the base of the east side of Tiger Mountain, I have seen coyotes, gray foxes, red squirrels, deer, bears, a bob cat, a cougar and 2 kits, a flock of humming birds, rabbits, quail, raccoons, and smelled the skunks. These are just the highlights. And most were seen just yards from my home. To say that if the bypass and Park Point are built, the animals can "just move east" ignores the basic facts that there are OTHER animals already living east of here, and that most animals have territories staked-sometimes encompassing miles of terrain. Some of our local representatives need to stop the pork-barrel-greased-palm-in-bed-with-big-money-developers politicking and look for real, viable, and Issaquah-friendly solutions to traffic problems. Or we should elect some new ones who are less concerned with lining their pockets and more concerned with stewardship of the land and the community.

I vote **NO** on the SE Issaquah Bypass.

  
Lori Laughren  
600 SE Evans/ POB 88  
Issaquah, WA 98027  
425 392 3311  
wowaste@earthlink.net

SEIS Comments Lori Laughren

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5. Impacts on wildlife were acknowledged and mitigation for these impacts was proposed in the SDEIS. Additional mitigation measures for potential wildlife habitat impacts are provided in Chapter 3 of this Final EIS and outlined in the project's proposed Wetland Mitigation Plan.

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Susan and Jeff Meyer  
230 Capella Dr. NW  
Issaquah, WA 98027

July 30, 2004

Mr. Bob Brock  
Public Works Director  
P.O. Box 1307  
Issaquah, Washington 98027

Dear Mr. Brock:

Thank you for the opportunity to comment on the SEIS for the SE Issaquah Bypass. Although the SEIS was well written and is easy to read, the issues are complex and we believe there are some shortfalls in the document. As individual citizens, we have the following comments:

- Traffic flow on the Bypass will not be adequate to solve the present and future needs of the citizens of Issaquah. There are 8 traffic impediments proposed along the bypass (e.g. crossings, full intersections, driveways, etc) between Front St. and the Sunset Interchange. As traffic increases as a result of not only population growth, but also from a new route for commuters to use, the slowness of traffic on the Bypass will cause drivers to resume use of Front Street through town to find relief. It is not clear whether this intangible factor is included in the assumptions made in the SEIS. In addition, since the Sunset Interchange has been constructed and is in use, traffic patterns in Old Town Issaquah have changed. Therefore, we don't have a lot of faith in the current traffic numbers presented.
- The Bypass will be a catalyst for increased development in rural King County south of Issaquah. The increased sprawl was not adequately addressed in the SEIS.
- The Issaquah-Hobart Rd. south of the proposed Bypass will experience significant increased traffic. More people living in south King County who work in Bellevue, Redmond or further north will use the Bypass to commute to and from work, because it is a shorter distance, and for a short time, possibly faster for them. How can the authors of the SEIS and our elected officials think that the Issaquah-Hobart Rd. will not need to be widened in the near future if the Bypass is built? There will be a major bottleneck at the southern connection point with more people going through Issaquah. At the July 15 hearing Mr. Irons stated that King County has removed plans for widening the Issaquah Hobart Rd. from the ten year plan. When there is gridlock and major air quality issues in the Issaquah Valley that plan will likely change. This Bypass is just another piece (North Spar, South Spar, Sunset Interchange, and Issaquah-Hobart Road) of a major commuter corridor, and those cumulative impacts have not been addressed.

1. Future year traffic volumes accounted for the Sunset Interchange opening and potential changes in traffic patterns were reflected in the future year volumes

2. Since issuance of the SDEIS, FHWA and EPA have coordinated on this issue during the City's negotiations with resource agencies for the 404 Merger Process concurrence on the preferred alternative. FHWA concluded that appropriate modeling approaches for the proposed project have been followed and, therefore, further study of sub-regional or regional land use effects would not be necessary. A copy of the FHWA and EPA correspondence on this issue, and concurrence from EPA and other resource agencies, is provided in the Concurrence Point 3 Package available from the City of Issaquah, or via the City's website at [www.ci.issaquah.wa.us](http://www.ci.issaquah.wa.us).

3. As a two-lane facility, the Issaquah-Hobart Road operates poorly in the future with or without the SE Bypass. Congestion on Issaquah-Hobart Road is predicted to get worse over the next 20 years, with the consequence of traffic backing up into Issaquah during the PM peak hours. King County determines the need for any modifications to the Issaquah-Hobart Road and may respond to this capacity deficiency in the future in accordance with regional policy. The City will continue to act on correcting its own traffic deficiencies under the assumption that neighboring jurisdictions will address conditions for which they are responsible. Also note that the SE Bypass would provide other improvements to in-City traffic mobility that are independent of current and projected capacity problems with the Issaquah-Hobart Road.

- With increased traffic going through Issaquah, there will be larger back-ups on I-90 during peak hours. This has the potential to increase air pollution. This was not addressed in the SEIS.
- Page 2-17 – Table 2-5 does not include a comparison to year 2000 or existing conditions (Table 2-6 includes year 2000 data). How can a citizen compare today's traffic volumes with those modeled for 2005 and 2030.
- All measures to deter commuter use of local Issaquah roadways should have been more thoroughly explored. For example, electronic tolling south of town, a commuter transit center at SR 18 and Issaquah Hobart Rd., a new North-South crossing of I-90 (for Issaquah residents), and a possible roundabout at Front and Sunset.
- The Visual Quality Ratings in the SEIS are addressed for only the immediate vicinity of the roadway project. The SEIS fails to discuss the visual impacts from east Squak Mountain where hundreds of Issaquah residents live. Numerous homes would have direct visual impacts from this roadway, lowering property values and disrupting the peaceful ambience of their homes. The cover of the DEIS is a better portrayal of the visual impacts. The large cuts are readily visible. However, it fails to accurately depict the large retaining walls necessary to keep the hillside in place, and the 50-foot concrete noise barrier walls at several intervals along the roadway. In addition, the SEIS does not adequately address visual construction impacts, examples of which we have all been subject to from the Talus and Highlands developments. The visual scars from these developments have been ongoing for years, and the aesthetic quality from across the valleys has not been favorable for Squak Mountain residents or our community.
- Noise impacts – Table S-1 does not mention construction impacts that will occur for two years. The analysis area for the noise impact assessment, as with the visual quality rating, appeared to only be measured within the immediate vicinity of the roadway. Noise travels well up hillsides and across valleys. From our home on the north side of Squak Mountain, we are well aware of noise impacts from the major roadways.
- Cutting into the slopes may expose groundwater and cause slope stability problems. This scenario has been played out before north of this proposed project. The SEIS does not address this issue.
- Proposed Infiltration Pond N-1 is located adjacent to the existing Sunset Interchange infiltration pond that is not infiltrating as proposed. When the SEIS was written, this fact was not yet known, apparently. The pond is on the valley floor and it is likely that there is a seasonal high groundwater table at or near the ground surface that would impede stormwater infiltration. It is apparent to us that we humans are not always able to mimic the natural environment and no matter how engineered a system may be, it may not work. The City has approved the paving of one of the largest known aquifer recharge areas in the county at the Highlands and Microsoft Campus (personal communication, Jerry Liszack, Dept. of Ecology, July 2002). We have seen how successful our efforts have been at infiltrating stormwater there and at the Sunset Interchange. This proposed roadway would apparently cover more large areas of aquifer recharge area. We

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4. The EPA (Environmental Protection Agency) has set National Ambient Air Quality Standards (NAAQS), which specify maximum concentrations for carbon monoxide (CO), particulate matter less than 10 micrometers in size (PM<sub>10</sub>), particulate matter less than 2.5 micrometers in size (PM<sub>2.5</sub>), ozone, sulfur dioxide, lead, and nitrogen dioxide. The project area is in compliance with these standards for all pollutants, but because the Carbon Monoxide (CO) standards have been recently attained, the project is in a CO maintenance area, therefore local intersection level CO analysis is conducted. Regional emissions analysis (including congestion on I-90) is conducted by the Puget Sound Regional Council (PSRC). The PSRC must include the project in the Metropolitan Transportation Plan and Transportation Improvement Plan. The project is included in their analysis as project ISS-9. The Puget Sound Clean Air Agency (PSCAA) is responsible for monitoring, setting standards, and regulating development to achieve regional air quality standards in the King, Kitsap, Pierce, and Snohomish counties. For additional information regarding air quality in the region, please visit the PSCAA website at: <http://www.pscleanair.org> or call the PSCAA at 206-343-8800. With the SE Bypass in place, north-south traffic can now access I-90 from 2 interchanges, the Sunset Interchange and the Front St Interchange. This also allows for a more balanced north-south traffic flow accessing I-90. Please refer to pages 2-18 -2-20 for a discussion on Front St. traffic operations in the future.

5. The purpose of Table 2-5 is to illustrate what potential **traffic volumes** would be in the future with and without the SE Bypass. This table illustrates that with the SE Bypass in place, Front St and 2nd Ave volumes would decrease. Table 2-6 summarizes **traffic operations** today and those anticipated in the future.

6. All of these options (except for the roundabout) have been explored previously. Please refer to SDEIS Appendix G, Transportation Technical Report, for a discussion on potential impacts of widening SR 18.

7. The SDEIS visual analysis followed appropriate state and federal guidelines and was reviewed and approved by FHWA and WSDOT prior to issuance of the SDEIS. The visual quality analysis in the SDEIS indicates that Alternative 5 would have moderately high visual impacts. Viewsheds selected for visual quality evaluation were determined, in part, by proximity to the project area. Because Squak Mountain is over 1 mile south of the proposed project's southern limits, views from that location were not evaluated. While portions of the roadway may be visible from some Squak Mountain locations, at that distance the project is not expected to result in substantial visual quality impacts to viewers there. As indicated in the SDEIS, property values are determined by a variety of factors and the proposed project is not expected to have a substantial influence on property values in the project area. Construction impacts were considered in the SDEIS, and mitigation measures for construction-related impacts are included in Chapter 3 of this Final EIS.

Mr. Bob Brock  
July 30, 2004  
Page 3 of 3

cannot afford to lose any more recharge areas to development, especially for a project that does not serve the citizens of Issaquah who must pay for the increased cost of imported water.

Once again, we appreciate the opportunity to provide input on this SEIS. We are looking forward to the City Council making a final decision on whether or not this roadway project will move forward so that families affected by the roadway can move on. This proposal definitely represents a crossroads for the Issaquah community. We sincerely request that the Council vote for the No-Action Alternative and to preserve the natural beauty and surroundings of our still relatively small community that has made Issaquah a valued treasure where people seek to live and raise their children. There is no need to proceed with the FEIS and expend even more tax dollars.

Sincerely,

Susan Meyer



Jeff Meyer



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8. It is correct to say that noise can travel from low-lying areas to areas above. However, Squak Mountain residences are located further than one-half-mile from the project area. Residences at this distance would not experience a noticeable change in noise levels from the project. As a comparison, Noise Receptor I is located 250 feet west of the project. Existing and future noise levels at Noise Receptor I are predicted to be 60 dBA for the existing conditions and future conditions with the project. With no change in noise levels resulting from the project at 250 feet, no noticeable change in noise levels resulting from the project are predicted at residences located at least one-half-mile from the project on Squak Mountain.

9. Potential impacts on groundwater and slope stability for Modified Alternative 5 are addressed in chapter 3 of this FEIS. Additional subsurface exploration would be needed at the design level phase prior to design of the structural walls in the northern project area.

10. Since issuance of the SDEIS, because of the variability of subsurface conditions in the proposed project area, it was agreed that North Pond 1 would no longer be assumed to provide infiltration. Additional information on stormwater analysis and pond designs is provided in the Concurrence Point 3 Package available from the City of Issaquah or online at the City's website, [www.ci.issaquah.wa.us](http://www.ci.issaquah.wa.us).



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JUL 29 2004

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**SOUTHEAST ISSAQUAH BYPASS COMMENT**

**Bob Brock, Public Works Director**  
City of Issaquah  
P.O. Box 1307  
Issaquah, WA 98027

To provide an ease for shoppers:

- Most people shop on Gilman Blvd. There are restaurants frequented on Front St. at low traffic hours. Parking is provided in the rear of these establishments as well as for the shops.

To take traffics off of Front Street:

- My understanding is Newport way was constructed for this purpose years ago. I can see that Front Street is used for traffic to get from I-90 to May Valley, Kent, etc. Why should we ruin the beauty of Issaquah by putting bypasses for people who do not live in Issaquah?

Smog:

- We live in a beautiful valley surrounded by Tiger, Squak and Cougar Mountains. The smog from the extra traffic will stay low within valley causing bad quality air. Did you notice the smoke from fireworks resting in this valley the morning after the 4<sup>th</sup> of July? It was not able to dissipate. I have noticed this for many years. It will only get worse from extra traffic going through on a daily basis. What will happen to this clean valley we are so fortunate to live in?

What is Important to Issaquah?

- I have frequently seen deer, bear, rabbit, some sightings of cougar, fox and owl, not to mention the birds, squirrels and many more. We keep choking them out. The bypass will do so even more as it will take the wetlands and the trees that make this town so beautiful not to mention the homes of families. It's ironic that I go to the City of Issaquah's website and the first thing I read is the City's Vision Statement, "*The City of Issaquah is committed to quality living through preservation and enhancement of the community's unique human and natural resources*". Is this no longer a true statement? If not, than I have to wonder what kind of officials have we elected into office that will take the homes of families, wild life and the natural beauty that makes Issaquah in order to pave a road making it easier for commuters to just pass through to the next town.

**I am voting NO on the bypass!**

Michelle Gipson, Homeowner  
535 SE Evans Lane  
Issaquah, WA 98027  
(Hm) 425-369-0734

*Michelle Gipson*  
7/29/04

1

1. Newport Way was among many alternatives that have been reviewed and rejected during alternatives screening and environmental review of the proposed project. Please see Chapter 2 of this Final EIS for a summary of alternatives considered for the proposed project.

2

2. The EPA (Environmental Protection Agency) has set National Ambient Air Quality Standards (NAAQS), which specify maximum concentrations for carbon monoxide (CO), particulate matter less than 10 micrometers in size (PM<sub>10</sub>), particulate matter less than 2.5 micrometers in size (PM<sub>2.5</sub>), ozone, sulfur dioxide, lead, and nitrogen dioxide. The project area is in compliance with these standards for all pollutants, but because the Carbon Monoxide (CO) standards have been recently attained, the project is in a CO maintenance area, therefore local intersection level CO analysis is conducted. The local intersection level CO analysis concluded that CO levels near intersections would be within EPA standards. The Puget Sound Clean Air Agency (PSCAA) is responsible for monitoring, setting standards, and regulating development to achieve regional air quality standards in the King, Kitsap, Pierce, and Snohomish counties. For additional information regarding air quality in the region, please visit the PSCAA website at: <http://www.pscleanair.org> or call the PSCAA at 206-343-8800.

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3. Your comments have been noted and will be considered in the City's decision for this project.

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JUL 29 2004

PUBLIC WORKS ENG

2:30 p.m.

David C. Williams  
580 Front St S #D210  
Issaquah, WA 98027  
July 27, 2004

Bob Brock, Public Works Director  
City of Issaquah Public Works Department  
PO Box 1307  
Issaquah, WA 98027

Dear Mr. Brock,

Please find my comments on the SE Bypass SDEIS below. Thank you for including them in the record.

p. S-2 (1-1)

The purpose of the project is stated in misleading and subjective language. It states that the bypass would relieve congestion and reduce future levels of congestion. In fact, it has been shown that the bypass will have had no effect by the year 2030. The SDEIS should be more clear that any relief of traffic congestion would be on a very short-term basis. This section states that the bypass provides an important link in the regional transportation system. This is another subjective statement. Given its long term effect on the transportation system, the SE Bypass is highly insignificant to the transportation system.

Nowhere in the SDEIS is the no-build option seriously discussed. This is a viable option and the pros and cons should be weighed with the other solutions.

In fact, the SDEIS is full of subjective statements and shows an obvious bias towards the building of the bypass. The statement should be completely rewritten in objective terms that don't predispose the reader to favor the proposed bypass.

p.S-24 (4-19)

No mitigation is proposed for the impact of increased sound levels. Noise has been shown to cause stress and unhealthy conditions. Issaquah residents should not be expected to contend with increased noise. The proposal is not complete without mitigation for noise. If mitigation is not feasible, as the SDEIS states, then the statement should recommend that the bypass not be built.

p. S-26

The runoff ponds will hold only enough water to handle up to a 50 year storm, and in some cases only up to a 4 year storm. The SDEIS is shortsighted in its mitigation of storm runoff effects.

David C. Williams - SE Bypass SDEIS Commentary

page 1 of 4

1. The Purpose and Need statement has been developed through careful review by the City and state and federal agencies. It is acknowledged that traffic modeling indicates that the proposed project may not operate as efficiently in 2030 as it would when first constructed. The project is intended to contribute to the regional transportation system and would provide an additional route for local and regional travel.

1

2. Evaluation of the No-Build Alternative, which has been defined as a decision not to construct the proposed project, was provided in the SDEIS and this alternative is included in this Final EIS.

2

3. When noise levels are predicted to exceed 66 dBA in the State of Washington, a noise impact is identified. FHWA regulations (23 CFR 772) specify that when noise impacts are identified, abatement (mitigation) measures must be evaluated. If abatement measures are found to be both feasible and reasonable, then abatement measures must be incorporated into the project design. If an area exceeds 66 dBA, but does not meet both the feasibility and reasonableness criteria, noise mitigation is not required.

3

Noise analysis in the State of Washington must follow WSDOT's policy and procedures document. Please see the following website for the guidelines followed for this projects analysis:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/policies.htm>

4

4. Proposed stormwater ponds are sized and designed following appropriate state and local regulations. Please see Chapter 3 of this Final EIS for more information on stormwater facilities proposed for Modified Alternative 5. Stormwater ponds are not expected to adversely affect existing streams or water quality.

The 4-year filtration ponds will regularly overflow, dumping oil, radiator fluid, windshield washing fluid, asbestos and rubber from the surface of the bypass into East Issaquah Creek. A full study should be done on the effects of this to the creek, its wildlife and adjacent property, and included in the SDEIS.

The possibility of a disastrous accident, resulting in leakage of hazardous petroleum materials or toxic chemicals from trucks into the Lower Issaquah Valley aquifer is not addressed. The SDEIS is not complete without a full backup plan for the provision of water to the town of Issaquah in case of a catastrophic and permanent failure of the current water supply due to damage caused by construction or traffic on the bypass.

p.S-28

Impacts to vegetation and wildlife are not sufficiently mitigated. The SDEIS states that vegetation clearing would be minimized. The term 'minimized' is not quantified and so is an empty and misleading term. Any clearing of vegetation would be disastrous for the health of the surrounding forest and the wildlife that lives there. There is no certification that one wildlife crossing will provide the necessary access for the local wildlife population. The needs of local wildlife should be further studied and documented.

p.S-29 (2-33)

The biological assessment of impact to endangered species is missing and without it the SDEIS is incomplete and insufficient. The project should not be allowed to put pressure on species that are already endangered.

p.S-31

The SDEIS states that no mitigation for impacts to the adjacent schools is necessary. This is a destructive and irresponsible statement. The bypass will increase noise and air pollution and thus affect the health of every child attending the High School, Clark Elementary and Tiger Mountain High School. These impacts should be studied exhaustively, discussed in full and completely mitigated before the project can continue. The city has no right to endanger these children. The SDEIS is missing this discussion and mitigation.

p.S-37

The view impacts are understated, or at best, undocumented. It is more likely that the view of Tiger Mountain from as far away as I-90 in Seattle will be affected. When the Parke Point development is taken into consideration, the view of Tiger Mountain from everywhere in Issaquah will be permanently and irrevocably spoiled. This will lower the quality of life for Issaquah residents. Further physical and financial mitigation must be mandated if this is to be allowed. Property taxes in Issaquah should be lowered in order to mitigate this concrete reduction in the quality of life in Issaquah.

Chapter 2

The SDEIS is written using traffic data from before the Sunset Interchange was built. The traffic data should be updated before the project is considered.

4

5. The analysis evaluates the potential to encounter hazardous materials during project construction and operation. Impacts and Mitigation resulting from a hazardous materials spill are discussed in Chapter 3. In the result of a release of hazardous materials during vehicle accidents, the City's Spill Contingency Management Plan would be in effect for response coordination, spill assessment and cleanup.

5

6. Clearing and grading amounts were identified in the SDEIS. Chapter 3 of this Final EIS provides information on impacts to vegetation associated with Modified Alternative 5. After issuance of the SDEIS, during the 404 Merger Process issue resolution process, the City agreed to participate monetarily and help initiate a study and planning effort that addresses regional wildlife connectivity. The City also agreed to facilitate a discussion during the project design stage with WSDOT to evaluate maintenance needs at the existing wildlife crossing on I-90 in coordination with state and federal fish and wildlife agencies.

6

7. A Biological Assessment (BA) was prepared for the project as a separate document in accordance with Section 7 of the Endangered Species Act. The Biological Assessment was issued and distributed with the SDEIS. A revised Biological Assessment has been prepared for Modified Alternative 5 and is being distributed with this Final EIS.

7

8. The City of Issaquah is currently working with the Issaquah School District regarding the noise abatement proposed as part of the project.

8

9. The SDEIS visual analysis followed appropriate state and federal guidelines and was reviewed and approved by FHWA and WSDOT prior to issuance of the SDEIS. As noted in the SDEIS visual impacts for Alternative 5 were determined to be moderately high. Visual quality impacts were assessed following appropriate state and federal guidelines. The proposed project is not expected to have a substantial impact on local property values. Mitigation measures for potential visual quality impacts associated with Modified Alternative 5 are identified in Chapter 3 of this Final EIS. Cumulative impacts associated with the Park Pointe project have been considered and it is acknowledged that views in the eastern portion of Issaquah are changing to reflect more urban conditions. Both projects would comply with existing land use designations for these sites and would be consistent with City plans for these areas.

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10. The Existing Year 2000 data was the most recent data available when this project began. Existing traffic data serves to provide framework the current traffic conditions only. Opening year analysis has been updated to reflect an opening year of 2010 rather than year 2005 as noted in the SDEIS. The Park Pointe development was assumed in all future year analysis.

Traffic from the proposed Park Pointe development should be included in projections. This traffic by itself will negate any gain in traffic capacity that the bypass provides.

p.3-3

Since the reasons for the reduced water flow in the Issaquah Creek system are not understood, a full study should be undertaken in order to understand what the effects of the construction of the bypass will be on the hydrology of the area.

p.4-2 Air Quality

The SDEIS states that particulates are primarily construction – related. However, particulates from diesel exhaust are a major source of pollution that would be introduced through the use of the bypass and would remain permanently. The effects of particulates from diesel exhaust should be studied and discussed in the SDEIS.

p.4-104

The SDEIS states that ‘the majority of impacts on vegetation and wildlife that would result from the Southeast Issaquah Bypass would not be of great consequence....’. This is yet another example of the irresponsible, biased statements that abound in the SDEIS. Any disruption of wildlife or habitat is of great consequence, no matter how large or small. When the development of Park Pointe, which would be enabled by the bypass, is taken into account, we can see that the bypass will destroy a huge piece of forest habitat. The SDEIS dismisses this impact flippantly and erroneously. The SDEIS reasons that this area is already on the edge of a residential area and so is already compromised. It fails to note that the bypass and development of Park Pointe will push the edge of the humanized, developed area much further back into the forest, compromising even more wildlife habitat.

p4-150

The SDEIS often states that the bypass will provide a link to the Issaquah Highlands. It should be clarified exactly who will need to get to the Issaquah Highlands from Front St and 2<sup>nd</sup> Avenue. Anyone who wants to get to downtown Issaquah from the Issaquah Highlands can already take the SPAR road to Sunset Ave. Why would they need the bypass? There is no demonstrated need for people to get to Issaquah Highlands from the south side of Issaquah.

The bypass effectively causes Issaquah residents to subsidize the lifestyles of people living outside the city boundaries. A discussion must be presented in the statement of how to gain their financial support of the bypass.

P4-188

In its discussion of property values, the SDEIS fails to mention the likely reduction in market value of residential property in Issaquah due to the spoilage of the city’s quiet, small-town atmosphere that will result from the building of the bypass and the Part Pointe development. Quality of life will decrease due to the loss of the rural nature of the

10

11. Potential impacts on hydrologic conditions associated with the proposed project are evaluated in the hydrology section of Chapter 3 of this Final EIS. A comprehensive study of water flow in Issaquah Creek is beyond the scope of the proposed project.

11

12. The EPA (Environmental Protection Agency) has set National Ambient Air Quality Standards (NAAQS), which specify maximum concentrations for carbon monoxide (CO), particulate matter less than 10 micrometers in size (PM<sub>10</sub>), particulate matter less than 2.5 micrometers in size (PM<sub>2.5</sub>), ozone, sulfur dioxide, lead, and nitrogen dioxide. The project area is in compliance with these standards for all pollutants and the project meets all federal and state air quality requirements.

12

The air quality analysis for the Southeast Issaquah Bypass project followed WSDOT guidelines. WSDOT air quality guidelines can be found on the internet at the following website:

<http://www.wsdot.wa.gov/fasc/EngineeringPublications/Manuals/EPM/425.pdf>

13

13. The CP3 document identifies additional mitigation plans for affected natural habitat and wildlife connectivity issues. Recognizing that more needs to be understood regarding the migration patterns of the large mammals between Tiger and Squak Mountains, the City agreed during the CP3 issue resolution process to participate monetarily and help initiate a study and planning effort that addresses regional wildlife connectivity. The City also agreed to facilitate a discussion during the project design stage with WSDOT through an inter-agency request to evaluate maintenance needs at existing wildlife crossing on I-90 in coordination with WDFW and USFWS. The Park Pointe development is not reliant on the SE Bypass for access and under the current land use designation and current zoning that allows up to 356 dwelling units, the SE Bypass is not needed for the development.

14

14. The proposed project is intended to provide an urban arterial as an alternative to using local streets such as Front Street or Second Avenue for trips that would pass the city. Vehicles traveling from the south, with no intention of stopping in the city, would be expected to use the proposed project for destinations that would include Issaquah Highlands and the Sammamish Plateau, as well as destinations to the east or west via Interstate 90.

15

15. The SDEIS indicates that real estate decisions are influenced by many factors and the proposed project is not expected to have a substantial impact on local property values. Economic conditions, proximity to Seattle and other nearby jurisdictions, and mobility provided by existing roads and other planned improvements, including the proposed project, would be among other considerations that also may influence local property values.



adjacent section of town. This will drive down property values, not increase them. The no-build alternative would maintain Issaquah's natural, forested setting, and so would actually keep property values high. People enjoy Issaquah because of the mountains and forests. Harming them will decrease, not increase, our quality of life and our property values.

The SDEIS proposes a solution which is temporary at best and ultimately encourages more of the congestion it attempts to alleviate. We can see from the experiences of cities like Los Angeles that building more roads never leads to less traffic in the long run. The bypass is a short term band-aid for the symptoms of urban sprawl, but does nothing to stop the sprawl and congestion over time. Alternatives that provide high density zoning and lead to mass transit solutions must be put forward and thoroughly discussed in the statement.

15

16

16. Your comments have been noted and will be considered in the City's decision for this project.

To: Bob Brock, Director  
Issaquah Public Works Department  
Cc: Issaquah City Council

The latest EIS issued on the SE Bypass, at a price of over three million dollars, is essentially only a compilation of several EIS's done over the long history of this proposal. The one new outstanding statement, coupled with the usual need to relieve the traffic on Front St, is that it would be part of a new regional arterial plan for a major north-south route which would promote development in areas south of and in the Issaquah Creek Basin.

The residents here have steadfastly opposed this road because of its environmental issues, but it continues to be promoted by business oriented representatives who do not live here and are interested only in development. Issaquah would lose its soul. Why should Issaquah provide a link to another north-south freeway? Why should Issaquah provide another route for vehicles which are only passing through and neither shop nor live here?

1

1. Traffic congestion along the Front Street corridor and at nearby I-90 interchanges is associated with pass-by travel that does require stopping in the city. The proposed project is intended to address this problem. Please see Chapter 1 of this Final EIS for more information on the proposed project's purpose and need.

Besides providing little new information, traffic data used are from before the Sunset Interchange was opened. It does not recognize the impacts of school buses and children driving their cars during commute hours. Nor does it adequately address the need to implement existing alternatives, such as bus service to the south, improving SR-900 and SR-18, and building an I-90 underpass to accommodate traffic to the Sammamish Plateau.

Since opening of the Sunset Interchange and summer vacation for schools, traffic on Front Street has moved freely and Second Avenue is essentially free.

However, proven over and over, "Build another road and they will come." The SE Bypass will provide another route for not only commuters but fleets of garbage trucks and other commercial traffic. The effects of noise and air pollution in this enclosed valley would be drastically increased, in spite of "best practices" and mitigations. These do not solve problems, they only make them seem less, while in the long run, have proven ineffectual.

2

2. Only the baseline information under existing conditions does not consider the Sunset Interchange. Traffic modeling for the 2010 year of opening and the 2030 future conditions does account for Sunset Interchange operations and potential changes in traffic patterns.

3

3. Your comments are noted. With mitigation measures, the proposed project is not expected to have substantial adverse impacts on air quality and noise. Impacts and mitigation measures for these elements under Modified Alternative 5 are provided in Chapter 3 of this Final EIS.

And worst of all, Issaquah would lose its soul. It's beautiful West Tiger flank and remaining recharge area and wetlands, so essential to Issaquah's water supply and surface streams, would be irrevocably compromised.

The northwest segment of this proposed road and the west slopes of Tiger Mountain contain the five springs that supplied Issaquah's water until 1972, when its first wells were drilled. The other western slopes are important recharge areas connecting drainage from perched aquifers on Tradition Plateau with the lower Issaquah Basin aquifer. The Issaquah Creek Basin supplies much of the water in Lake Sammamish and is of area-wide importance.

Rerouting and containment of groundwater is very difficult to predict and necessitates evicting residents from their homes and creating large containment ponds which rarely function as intended. Citizens are concerned about West Nile virus, spread by mosquitoes, in standing water such as detention ponds. Spraying such ponds is needed for mosquito control. Better to leave the water in the ground or streams where this is not an issue.

4

4. The proposed project is not expected to result in adverse impacts on groundwater or surface water quality. A new Wetland Mitigation Plan has been prepared for Modified Alternative 5 and is included in this Final EIS.

5

5. The proposed project would not affect groundwater routes and proposed stormwater ponds would not result in substantial home displacements. Proposed stormwater ponds would be designed for natural fluctuations in water levels and are not expected to require the use of pesticides or other hazardous chemicals for operation and maintenance.

The SE Bypass plans necessitate the removal of the toe of a hillside and the erection of a series of 50-foot walls to prevent the glacial till above it from sliding. A lesson is to be learned from the "blowout" which occurred recently on the Sunset Interchange. Dammed groundwater seeking new courses built enough pressure to break through its retaining wall. A similar situation, even more disastrous, can be found in the proposed SE Bypass.

As the EIS states, there will be increased mobility throughout the eastern portion of the City but from the loss of quality of living, this is a detriment, not an asset. If approved, Issaquah will be saddled with debt for years to come and its quality-of-life losses cannot be quantified.

Please reconsider the NO BUILD option with its own mitigations to move this traffic.

Sincerely,  
Ruth A. Kees  
9506 240th Wy SE  
Issaquah, WA 98027

6

6. Subsurface soil and groundwater conditions change significantly over relatively short vertical and horizontal distances in the project vicinity and it is not possible to compare conditions elsewhere with the proposed project area. Additional subsurface exploration would be done at the design level stage to determine the design of structural walls in the north project area.

July 30, 2004

SE Issaquah Bypass

I am a downtown resident and business owner. I am unhappy with the current SDEIS report. I find it to be outdated due to the Sunset Interchange now being open and having reduced traffic flow and given more option towards the use of 2<sup>nd</sup> Ave. The bus barn is moving up to the plateau further reducing traffic. 2<sup>nd</sup> Ave coming into effect with no parking on it has reduced congestion. My business is not impacted by the traffic issue very deeply and for me this change in look of Issaquah with the potential of 50' walks, increased tax burden as a resident, the impact of schools which I have a student in my family attending Issaquah High School. All those lead me to believe that this impact statement did not cover things.

It is outdated and it hasn't been through enough to address the impact on our community and leads me inclined to very much favor other alternatives being researched such as use of 2<sup>nd</sup> Ave, synchronize traffic lights, possibly a tunnel under 90, and those kinds of things in conjunction with each other. I did not find to be well researched in this report so my commentary is that I do not want the city basing their decision on the recommendation towards building a bypass I would rather see other options explored, better use of my tax money, better for our community in terms of reducing the polarization that would take place if the bypass were put into effect as planned. I'm not happy with the EIS.

Leanne Dollan  
169 Sunset Court  
Issaquah, WA 98027

Comments left on voice mail for Pam Fox on July 30 2004

1

1. Modeling used in the traffic analysis for the SDEIS did account for operation of the I-90 Sunset Interchange in both the year of opening and future operations traffic estimates. The interchange is also included in the updated year of opening analysis provided with this Final EIS. Economic impacts and impacts on schools were identified in Chapter 4 of the SDEIS and are also analyzed for Modified Alternative 5 in Chapter 3 of this Final EIS.

2

2. The SDEIS does include consideration of impacts on traffic, schools, economics and visual quality. Additional information on potential impacts related to these elements under Modified Alternative 5 is provided in Chapter 3 of this Final EIS.

3

3. Other alternatives were considered and rejected for the proposed project. Please see Chapter 2 of this Final EIS for information on the alternatives screening process.

July 27, 2004

SE Bypass SEIS

As a Front Street resident, the impacts to my home cannot be mitigated. Under Alignment South A my home would be removed for a 'wetland creation site.' Under Alignment South C, access to my home is seriously impacted due to the divided roadway in front. The SEIS does not address the impacts of limited ingress and egress to our homes. It appears one of my driveways would be removed – how will that be mitigated?

This document has not considered the No Build option as a viable alternative. If the proposed bypass is truly two lanes; why wasn't 2<sup>nd</sup> Avenue discussed? It is being utilized at an affordable cost and is certainly less invasive on the environment.

The Issaquah valley is unique – it is fragile. The best science has failed us in the past and that is why the mitigations in the SEIS are so meaningless. You are aware of the recent Issaquah Highlands Camp Creek blowout and the Infiltration Pond at Sunset Interchange, that doesn't infiltrate as designed.

There have been other engineering and design failures in the City. Major concerns are the hillside cuts with 50' retaining walls in an area undermined with springs – our aquifer recharge area. Also, the wetland fill required for the roadway will definitely increase the flood hazard in this area – I question if the infiltration ponds will accommodate the excess runoff.

Marilyn Batura  
975 Front St S  
Issaquah, WA 98027

1. Modified Alternative 5 has been selected as the only build alternative to be advanced in the Final EIS. This alternative would include the South A alignment along 6th Avenue and new locations for stormwater facilities. One homes along Front Street would be affected. Mitigation measures for displaced homes would be provided following federal, state, and local regulations. Access to remaining homes would be maintained.

2. The No Action alternative was considered in the SDEIS and is included in this Final EIS. Improving 2<sup>nd</sup> Avenue Southeast to provide additional capacity does not meet the goals of the stated "Purpose and Need" of the Southeast Bypass Project which is "to create a new north/south arterial roadway". Sunset Way is classified as a minor arterial and 2<sup>nd</sup> Avenue Southeast is a collector arterial and has a lower classification and is designed for lower traffic volumes than the proposed project. As such, these roads are designed for lower traffic volumes than the proposed project and are not intended to provide primary relief for traffic congestion on the Front Street Corridor. The City has expressed concern regarding the impacts of "cut-through" traffic on the Old Towne neighborhood associated with the use of Sunset Way and Second Avenue as routes to local freeway interchanges. The proposed project would provide a more acceptable route for pass-by trips that do not require local access.

Using 2<sup>nd</sup> Avenue Southeast as the Bypass would separate and isolate the neighborhood east of 2<sup>nd</sup> Avenue Southeast, and Sunset Way would function at Level of Service F in the year 2030 which would add to degradation of the neighborhood. Utilizing 2<sup>nd</sup> Avenue Southeast as an arterial bypass would require very significant improvements and additional right of way on that street and on Sunset Way to accommodate the projected traffic volumes. Those improvements could create a severe impact to the neighborhood communities and the three schools fronting on 2<sup>nd</sup> Avenue Southeast.

3. Your comments are noted. Subsurface soil and groundwater conditions change significantly over relatively short vertical and horizontal distances in the project vicinity and it is not possible to compare conditions elsewhere with the proposed project area. Potential impacts on groundwater recharge indicate that, at worst, the proposed project would result in a 0.10 percent (1/1000) reduction of total recharge volume in the Lower Issaquah Valley aquifer. If additional testing confirms infiltration potential for stormwater ponds, no reduction in aquifer recharge would be expected because nearly all runoff from the proposed roadway would be infiltrated.

4. Stormwater drainage and flood protection measures would be provided. With mitigation, the proposed project is expected to result in no effect on 100-year flood levels in the project area.

RECEIVED ON

AUG 30 2004

August 26, 2004

CITY OF ISSAQUAH  
OFFICE OF THE MAYOR

Dear Madame Mayor,

I recently attended a Issaquah school board meeting. One of the conflicts that came up was about the SE Bypass. I like the idea of having a bypass that goes in front of the high school. It will be easier for my mom to get down to the high school as we live on the plateau. I don't like the idea of having a road going through the ball fields though. Thank you for listening to my opinion.

Regards,

*Jamie Eide*

1

1. Your comments are noted. Under Modified Alternative 5 the North C alignment would require a portion of the high school athletic field. The field would be reconfigured and would continue to function after the proposed project is constructed. Please see Chapter 3 of this Final EIS for additional mitigation for impacts to school facilities.



**Pam Fox**

**From:** Carolyn Sygitowicz  
**Sent:** Tuesday, July 13, 2004 4:47 PM  
**To:** Pam Fox  
**Subject:** FW: water in the hills on the north end of the railroad grade

-----Original Message-----

**From:** Aunt Grumpy [mailto:auntgrumpy@worldnet.att.net]  
**Sent:** Tuesday, July 13, 2004 8:09 AM  
**To:** City Council  
**Subject:** water in the hills on the north end of the railroad grade

Good Morning,

After an evening at MDRAC listening to the cost overruns of the white paper I thought you might find this information out of the SE Bypass SDEIS and underlying Earth Technical Report interesting. In one section of the SDEIS it is indicated that the steep slopes on the north end of the railroad grade are mapped landslide hazard but because there is no water, they are no longer a critical area. Later in the SDEIS, water is discussed in the same hill. After researching, I found that the Earth Technical Report, which contains the boring results, clearly found water plus difficulties in boring on that slope because of large boulders. Several of the borings had to be stopped and moved to a different area to avoid the boulders. See citations below.

**Landslide Hazard:** The language on pg 4-29 of the SDEIS indicates that borings show that there is not water in the landslide hazard area.

Then on page 4-260 and in the Earth Technical Report\* water/seeps are described to the north in the hills. The SDEIS indicates that no mitigation is necessary because these hills have no water or seeps.

\*In the northern section "multiple saturated zones usually less than 1 meter thick were encountered within the recessional outwash that reached to 139.1ft at the gun club well. Piezometers and monitor wells installed in this area do not measure these multiple saturated zones as they tend to drain out or are too thin to measure. Ground water flow is generally vertical with localized lateral movement to the edges of the less permeable layers." (pg 20 Earth Technical Report)

Were the risks of cutting into this slope accurately assessed in the SDEIS? What is the realistic cost?

Connie Marsh

1. Please see response for the Issaquah Alps Club (letter dated July 30, 2004) in this FEIS. In addition, the "Landslide Hazard" delineation should be removed from the north portion of the Bypass alignment because, based on our knowledge of subsurface conditions, the area does not meet the definition criteria for this Critical area. However, this same area is considered a steep slope hazard area which requires more stringent subsurface exploration, design considerations and construction issues compared with a landslide hazard area.

Landslide hazard areas, in a classic sense in the Puget Sound lowland, are areas where permeable soils overlie impermeable soils (for example, sand over silt). Also associated with this classic geologic sequence for landslide hazards, is ground water that occurs within the sand soils immediately above the silt interface, which is then truncated by a slope. This emerging ground water is often, but not always, observed as springs or "seeps" on a hillside. These conditions (sand over silt with regional ground water emerging in slope areas) were not observed at north end of the Bypass alignment. We expect that ground water emerging within the slope face is likely masked by the weathered soils that mantle the slopes which is a common condition throughout the Puget Sound lowlands.

Ground water was observed in many of the test borings completed for the DSEIS. This ground water was encountered at depth in most of the test borings, and did not occur at an elevation where it may intersect a slope. However, as described in the response for the Issaquah Alps Club, additional subsurface exploration is required to further evaluate soil and ground water conditions as a basis for design of the Bypass project.

7/14/2004

July 28, 2004

Dear Mr. Brock, Mayor Frisinger & Issaquah City Council Members:

From the lower north flank of Squak Mountain, I have seen Issaquah change dramatically since December, 2000. There has been the road work on state route 900 day and night, the Highlands has been stripped of trees and denuded of all native vegetation as if a nuclear weapon was denoted at ground level. Then Talus began. Acre after acre of forested hillside has been replaced with houses and asphalt. Next, you have permitted a 12 story building to rise above the forest canopy like a huge scab. The earthmovers are relentless. Instead of hearing the birds singing, we listen to the clank of bull dozer tracks and the incessant beeping of machinery backing up. Oh, and don't forget the new state route 900 construction which adds so much to the livability of our community.

Do you ever ask yourselves, "When will it end?" Or do you not live in Issaquah and have to witness the constant assault on the environment?

Now, it is the Southeast Bypass. After reading over the SEIS and attending the public comment session, I would like for you to consider the following:

a) There is currently one lane of traffic coming north into Issaquah via Issaquah-Hobart road. These commuters have three routes to choose from to connect to I-90 when they enter Issaquah. Instead of building the Southeast Bypass, consider installing an electronic reader board at the junction of Issaquah-Hobart road and May Valley road which could post commute times on the three north-bound routes through Issaquah. Let the commuters make an informed decision and manage traffic themselves. Also, are there not other, less costly options for decreasing traffic congestion through downtown (better light synchronization, another I-90 underpass, improving the existing three north bound routes, and more mass transit?) Commuters, like water, seek the path of least resistance.

1

b) The aquifer issue is critical. We have paved over such a large percentage of the recharge plain for the Issaquah aquifer that we have to chlorinate our drinking water for the first time in history. Isn't this a major indicator that retention ponds are not the answer? Water quality must take precedence over congestion on Front Street (which I have been observing for the last 3 months and it is not that bad. Do you have new data to share?)

2

c) The SEIS did an inadequate job of addressing air quality issues. Not only was the data flawed due to positioning of the monitoring stations, but three key pollutants (ozone, NO<sub>x</sub>, and particulates) were not even studied. Doesn't a vehicle traveling at 40 mph produce much more NO<sub>x</sub> and particulates than one that is idling? Isn't this also true when considering noise levels- the faster you travel, the greater the decibel level? Have you sat out on a summer's evening on Squak Mountain and listened to the roar of I-90?

3

d) What impact will a four lane bypass have on the students of Clark Elementary and Issaquah High School? I find it suspicious and cowardly that the Issaquah School Board has not taken a stance on the bypass issue. I have a student at Clark and have taught at IHS. I have used the adjacent green space to the east of the campus. It is a priceless teaching tool. Would you feel comfortable subjecting your child to the elevated noise levels and diminished air quality that a 4 lane bypass will bring? Is this bypass in agreement with the district's mission statement of "All students learning well?"

4

It is time to think of cause and effect over a longer time period. Issaquah's natural resources are priceless gifts that we are fortunate to have. Let's think of the future in terms of what our children will be left with. Do we want Issaquah to become another Factoria? Or do you have the will, creativity and passion to preserve the soul of this community and put a stop to Southeast Bypass and more development? Remember what you have said, "The City of Issaquah has had a long-term commitment to the environment. It is one of the City's core operating values."

There is a simple equation that should guide your decision making:

More roads = More development = Lower quality of life

Think outside of the box. Let us find solutions that preserve the natural resources we have been given.

Respectfully,  
Mark Buchli, Tracy Sundberg, Zoe and Lucas Buchli  
125 Mt. Pilchuck Avenue NW  
Issaquah, WA 98027

1. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but these alternatives are not reasonable because they are not effective in reducing congestion.

2. Potential impacts on groundwater recharge indicate that, at worst, the proposed project would result in a 0.10 percent (1/1000) reduction of total recharge volume in the Lower Issaquah Valley aquifer. If additional testing confirms infiltration potential for stormwater ponds, no reduction in aquifer recharge would be expected because nearly all runoff from the proposed roadway would be infiltrated.

3. The EPA (Environmental Protection Agency) has set National Ambient Air Quality Standards (NAAQS), which specify maximum concentrations for carbon monoxide (CO), particulate matter less than 10 micrometers in size (PM<sub>10</sub>), particulate matter less than 2.5 micrometers in size (PM<sub>2.5</sub>), ozone, sulfur dioxide, lead, and nitrogen dioxide. The project area is in compliance with these standards for all pollutants, but because the Carbon Monoxide (CO) standards have been recently attained, the project is in a CO maintenance area, therefore local intersection level CO analysis is conducted. The local intersection level CO analysis concluded that CO levels near intersections would be within EPA standards.

WSDOT air quality guidelines can be found on the internet at the following website:  
<http://www.wsdot.wa.gov/fasc/EngineeringPublications/Manuals/EPM/425.pdf>

4. The Issaquah School District has expressed concern about noise and safety impacts to Issaquah High School, Clark Elementary School, Tiger Mountain Alternative School, and the athletic facilities. Mitigation measures for potential impacts to the schools are discussed in Chapter 3 of this Final EIS.

**Vision for Issaquah:** A community that embraces its environment, history, and small town charm while ensuring a welcome and safe place to live, learn, work, and play. --Nancy Davidson

Nancy Davidson, Chair  
Issaquah City Council  
P.O. Box 1307  
Issaquah, WA 98027

CITY CLERK'S OFFICE  
JUL 30 2004  
RECEIVED

375 SE Croston Ln  
Issaquah, WA 98027  
issyduke@earthlink.net  
July 26, 2004

Dear Council Chair Davidson,


Since 1986 and I have lived in Issaquah and been active in the community. I was glad to vote for you, having seen you in meetings and observed your blend of skills and balanced judgment. Thank you for serving us well.

I would like to express my opposition to the proposed SE Bypass and in so doing urge you to consider the long range consequences this project would have on vital natural resources, overall quality of life in the basin, and the character of this place. This 1.2 mile strip of road, ostensibly pursued by a Canadian developer, cannot possibly be worth the sacrifice of a critical aquifer recharge area, forested slopes that absorb noise and air pollution and that are the best possible flood mitigation, an atmosphere conducive to learning for students at four Issaquah schools, and Issaquah's visual appeal, small-town charm, and history as a gateway to the forested hills.

We can do better than this in solving our traffic problem. Laying another swath of asphalt is neither creative nor resourceful. We can make better use of existing roadways. We can use the engineering feats cited for this project to instead put transit on Hobart Road. (Issaquah's Park and Ride expansion shows that people here, including those who go there from Hobart Road, want to use transit.) Since David Irons cites that a large volume of Hobart/Front Street traffic is coming from Maple Valley, we can press for Highway 18 completion so that this traffic is just minutes from I-90. The best solutions require working across jurisdictions. Tell us as citizens how to support that effort.

Please consider your stated vision for Issaquah and your commitment to this vision in evaluating the consequences of the proposed SE Bypass

Sincerely,



Patricia Duke

1

1. and 2. Your comments have been noted and will be considered in the City's decision for this project. Impacts to the aquifer, vegetation, and other resources were evaluated and detail with mitigation identified. Many alternative traffic improvement alternatives were also evaluated, as summarized in Chapter 2 of the FEIS. The bypass is selected as the Preferred Alternative based on factors including balancing social and economic impacts, impacts on the natural environment, transportation system performance, and cost.

2

Lewis Enterprises  
275 NW Cherry Pl.  
Issaquah, WA 98027-3252  
425 392 6589  
[mary\\_lou\\_lewis@msn.com](mailto:mary_lou_lewis@msn.com)  
9 July 2004

RECEIVED  
JUL 12 2004  
PUBLIC WORKS ENG.

Mr. Bob Brock, Public Works Director  
City of Issaquah Public Works Department  
PO Box 1307  
Issaquah, WA 98027

Dear Bob:

Re: Proposed SE Bypass

In spite of all the additional studies concerning the proposed SE Bypass, I am still opposed to this proposal. My biggest objection is the noise which it will create both during the construction, which fortunately would be temporary, but the constant traffic which it could generate.

The answers in the recent ISSAQUAH PRESS did not lessen my concerns. As I have stated previously, my home at 865 Highwood Dr. SW is bombarded constantly with the noise from I-90. This noise makes it impossible to open windows on the east side of the house or to sit on the deck without hearing the traffic from several miles away. This noise also affects my other properties. No one in Issaquah should be subjected to constant noise intrusion into our lives.

Sincerely,

*MaryLou Lewis*

MaryLou Lewis  
Property owner at 275 NW Cherry Pl, 295 NW Cherry Pl, 330  
3<sup>rd</sup> Pl. NW, 190 NW Dogwood, 486/488 Front Street N., 865  
Highwood Dr. SW

1

1. When noise levels are predicted to exceed 66 dBA in the State of Washington, a noise impact is identified. FHWA regulations (23 CFR 772) specify that when noise impacts are identified, abatement (mitigation) measures must be evaluated. If abatement measures are found to be both feasible and reasonable, then abatement measures must be incorporated into the project design. If an area exceeds 66 dBA, but does not meet both the feasibility and reasonableness criteria, noise mitigation is not required.

Noise analysis in the State of Washington must follow WSDOT's policy and procedures document. Please see the following website for the guidelines followed for this projects analysis:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/policies.htm>

25041 S.E. Mirrmont Drive  
Issaquah, WA 98027  
July 11, 2004

Issaquah City Council:  
Mr. Fred Butler, Mr. Bill Conley, Ms. Nancy Davidson, Mr. Joe Forkner,  
Mr. Russell Joe, Mr. David Kappler, Mr. Hank Thomas  
P.O. Box 1307  
Issaquah, WA 98027-1307

Dear Council Members:

I believe that cities, like people, have turning points. Those points in people's lives are seldom the result of crises. Typically they follow from mundane decisions, responses to practical issues, their significance unnoticed at the time. City governments also make decisions which, seeming less than momentous, carry within them the power to set the course of the future. I think that Issaquah is facing a turning point regarding the proposed southeast bypass.

We live in Mirrmont, five miles south of the city off Issaquah-Hobart Road. We were drawn to Mirrmont in August of 1989 because of its natural setting and distance from the crowding in the I-90 corridor. In the years since, we have seen an extraordinary increase in traffic volume on what is essentially a two-lane country road. The draft Environmental Impact Statement published in 2000 confirms an increase of 94% in a.m. volume for the period 1994–2005. This rate of increase is second in Issaquah only to the rate projected for the lower plateau (Full Build, Exhibit 7.6).

Over the past two years, the problem has become acute. In the fall of 2003, I recorded the time it took to drive 1.5 miles on Issaquah-Hobart from the Mirrmont intersection to May Valley Road, which I take to SR900 and on to work. I recorded the times on five days in October and November, a little before 7:00 a.m. Three days were rainy, two dry. My speeds averaged 10.3 mph on a road posted for 45.

The proposed bypass, which would slice through a corner of the Issaquah High School campus and fish-hook around the base of Tiger Mountain, would dump an undetermined number of new vehicles onto Issaquah-Hobart Road. The current EIS confirms that widening Issaquah-Hobart to accommodate the volume is nowhere in the plan: "King County policy regarding a roadway facility that is designated as rural (such as the Issaquah-Hobart Road) states that capacity improvements can be warranted only when existing conditions prove to be deficient. Issaquah-Hobart Road is currently at the brink of failure but is not listed as deficient."

A primary beneficiary of the bypass would be the Canadian developer, First Wellington. An approval would trigger an immediate response by First Wellington to proceed with its proposal to add close to 700 residences at the base of Tiger Mountain. Although the EIS claims, "...the Park Pointe project would likely be constructed with or without the Southeast Issaquah Bypass," many are skeptical, including members of our own city

planning department. Every alternative configuration for this development would compromise, to a greater or lesser degree, a prime source of the Issaquah aquifer. We have seen, regardless of mitigation plans, the unanticipated consequences that development can have on our water and land, from Hood Canal to the Issaquah Highlands.

The increase in traffic created by this development alone would negate the effect of increased capacity, which is the reason for considering the bypass at all. Using the common rule of thumb that is also used by the Issaquah Planning Department, each new residence creates five new vehicular trips per day. Of course this figure, which is supported by years of data, seems high until you consider trips to and from school and work, shopping trips, deliveries, and trips by visitors. An approval of the bypass would add to Issaquah roads 3,000+ new trips per day from Park Pointe. As the 2000 EIS states, by 2015 the a.m. access from the bypass to Issaquah-Hobart would degrade to a level of service C or F. At the other end of the proposed route, the current EIS supplement adds, "...a slight deterioration in operations can be observed at the intersection of Front Street South with the I-90 ramps...in the Build scenario the intersection of eastbound I-90 and Front Street South is anticipated to increase in delay over the No Action scenario during the PM peak hour."

The current EIS continues cheerfully, "The Southeast Issaquah Bypass would support planned development, especially full development of the planned Park Pointe project. Because the roadway is expected to attract vehicles currently using other key streets in the city, including Front Street South and Southeast Newport Way, it would also support other planned projects, such as the recently approved East Cougar Village development on the west side of the city." Is development the real goal? In its language, the author of the EISes gives itself away. Parsons Brinkerhoff, a worldwide engineering consulting firm headquartered in New York, proudly displays this statement on its web site:

*We help shape some of the world's largest and most important public works projects, from Boston's Central Artery/Tunnel to Britain's rail system Network Rail; from the Sabiya power plant in Kuwait to Cairo's Metro and the Deep Tunnel Sewerage System in Singapore.... PB is one of the most dynamic and fastest growing companies in the planning, design and construction industry...*

Among their self-proclaimed "projects of the year" in 2002 was a toll road in the San Diego to Mexico corridor:

*Faced with a shortage of tax dollars to fund construction and infrastructure projects, the California State Legislature passed a bill in 1989 permitting the State to enter into franchise agreements with private companies to build privately funded transportation projects. PB, in partnership with the French company Egis Projects, created California Transportation Ventures, Inc. (CTV) to win one of the private franchises."*

The goal of PB is to identify development opportunities and work in consort with municipal officials to make them happen.

1

1. Potential impacts on groundwater recharge indicate that, at worst, the proposed project would result in a 0.10 percent (1/1000) reduction of total recharge volume in the Lower Issaquah Valley aquifer. If additional testing confirms infiltration potential for stormwater ponds, no reduction in aquifer recharge would be expected because nearly all runoff from the proposed roadway would be infiltrated. Please see Chapter 3 of this FEIS for more information on water quality impacts related to Modified Alternative 5.

2

2. The Park Pointe Development continues forward with or without the SE Bypass in place. The Park Pointe Development would not add 3000 trips per day to the Issaquah arterial network as suggested in the comment.

3

3. The goal of the proposed project, as stated in Chapter 1 of this Final EIS, is to relieve congestion on city streets and at local interchanges. Under state and local growth management provisions, adequate transportation facilities must be provided to support planned development. The proposed project would help the City meet these requirements.

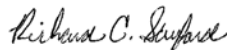
After the seven years of study in which Parsons Brinkerhoff has been involved, a second Front Street next to the heart of the city has failed to win the hearts or minds of anyone. PB and First Wellington are not disinterested parties. What the citizens of Issaquah have come to realize over the seven years of study and debate is that the project is a give-away to out-of-state developers and engineering consulting corporations. As citizens have commented earlier in this study, the proposal is not for a bypass at all but for a "second road." It would only shift the traffic problem from the I-90 intersection to the south end of Front Street and beyond. Even this diversion would be temporary, until new development counteracts it. By enabling more development, more pavement would simply fill with more cars. It has happened all over California, and it would happen here. The second road would jeopardize our ground water and environment. Finally, it would make no economic sense.

The cost in the 2000 EIS, for what was then identified as the preferred route, was \$27.3 million. The current supplement guestimates \$29 million in 2002 dollars but adds the critical caveat: "These estimates are based on preliminary design information and would likely change at the time of construction." The latest figure published in the Issaquah Press is \$40 million. This is an increase of 46% in four years, *before any work has begun*. Whatever the final shape of any funding package, it is clear that the taxpayers of Issaquah would be left with a bond issue which, if it could be passed, would divert funds from education, environmental protection, and services that enhance the quality of life.

There was a time when downtown Bellevue was not a snarl of traffic. We have seen the photos from the sixties on the walls in Bellevue Square. That was long before most of us were living here. Decisions were made by a council such as ours that changed the character of that city forever. Given the choice between the irretrievable sixties version and today's, I wonder which Bellevue its current residents would prefer.

From the old tattered paperback in my bookcase, I am reminded that this is Bessie Wilson Craine's<sup>1</sup> valley that is hanging in the balance. It is the heart of Issaquah at a turning point. Ten years from now, if our city is a tiny island of quaintness choked by a ring of shabby townhouses and gas station convenience stores, will it have been worth the cost? Will those who remain here never ask how it happened, or will they remember that Issaquah had a choice? Those entrusted with the decision had a choice. Instead, they could have done what no one really expected, the thing that they knew deep down was right.

Sincerely,



Richard Sanford

<sup>1</sup> Author of *Squak Valley: A Tale of Old Issaquah*.

4

4. Your comments are noted.

5

5. Your comments are noted. City decision makers will consider costs in evaluating the choice to build, or not to build, the proposed project. The rise in cost is due to several factors. In 2000 a two-lane road was assumed, but had to be expanded to four lanes to meet the projected 20-year demand. Construction costs have escalated in recent years making all public works project more expensive.

**Pam Fox**

**From:** Bob Brock  
**Sent:** Wednesday, July 14, 2004 11:36 PM  
**To:** Carolyn Sygitowicz; Pam Fox  
**Subject:** FW: Southeast Bypass

fyi

-----Original Message-----

**From:** ragassiz@comcast.net [mailto:ragassiz@comcast.net]  
**Sent:** Wed 7/14/2004 7:44 PM  
**To:** Bob Brock  
**Cc:**  
**Subject:** Southeast Bypass

Dear Bob,

I'd like to register my Opposition to the building of the Southeast Bypass.

Rod Agassiz

979 Highwood Dr SW

- |   |  |
|---|--|
| 1 | 1. The City has received your letter and appreciates your input. |
|---|--|

7/15/2004



**Pam Fox**

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**From:** Carolyn Sygitowicz  
**Sent:** Monday, July 12, 2004 1:43 PM  
**To:** Pam Fox  
**Subject:** FW: Southeast Bypass

-----Original Message-----  
From: ragassiz@comcast.net [mailto:ragassiz@comcast.net]  
Sent: Monday, July 12, 2004 1:34 PM  
To: MAYOR  
Subject: Southeast Bypass

Dear Eva,

I want to register my opposition to the building of the Southeast Bypass.

Rod Agassiz  
979 Highwood Dr Sw  
Issaquah, Wa 98027

1

1. The City has received your letter and appreciates your input.

120 Newport Way NW  
Issaquah, WA 98027  
July 4, 2004

RECEIVED  
JUL 09 2004  
PUBLIC WORKS ENG.

CITY CLERK'S OFFICE

JUL - 8 2004

RECEIVED

RECEIVED BY ALL  
COUNCIL MEMBERS

AF/LK/JM/CR/BOB B

Rmf

Issaquah City Council

I do not think there is a real "solution" to Front Street traffic. In fact, I believe the more roads you build to "solve" a traffic problem, the more traffic they attract.

If, heaven forbid, it is decided to build a bypass, it must be a two-lane road. Why would you want to hook up a two-lane road to a short stretch of "freeway"? Is this to enable drivers to rev up to 70 miles per hour before they get to I-90?

I resent the idea that there is always money out there someplace that we can use for such a boondoggle. Remember, no matter what the label, this is your money and my money - it is going to cost us no matter what so be careful and be sure it will really work.

Some suggestions: 1. As of now, I have only two ways to get from "South" Issaquah to "North Issaquah", both of which are using freeway interchanges. How about using some of this "maybe" money to build a connecting road between these interchanges via an underpass so some of these cars will not add to the traffic on Front Street or Highway 900. 2. Synchronize the lights on Front Street better. This may be difficult because of the pedestrian crossing lights. 3. Re work 2nd Street with good safety requirements. Strict 25 mph speed limits, with rush hour patrols, speed indicator signs like on Sunset, allow no parking, add bike lanes, sidewalks, speed bumps, etc. If they want to drive fast, drive highway 18. This way is a bit longer, but faster. 4. Consider improved access to 900 via the May Valley Road. Improve 900 to the new "green totem pole" interchange. and 5. Don't do anything. When it becomes too bad, maybe the drivers will go someplace else. They are too much in a rush to stop and shop in Issaquah anyway.

Sincerely



Jack B. Albrecht

1

1. Traffic studies for the proposed project have indicated that a four-lane roadway would be desirable to accommodate present and future traffic volumes in the project area. City decision makers will ultimately determine the final design of the roadway, if the build alternative is selected.

2

2. Your comments are noted. The city has not yet determined what actions will be pursued if the proposed project is not constructed. Some of the suggestions on traffic improvements are being made, including signal coordination and the I-90 Undercrossing project to provide another route across I-90. However, as summarized in Chapter 2 of the FEIS, these and other alternatives won't significantly improve traffic between I-90 and Issaquah-Hobart Road, which is the purpose of the bypass. The No Action alternative is an option, if that is what City decision makers desire.

**Pam Fox**

---

**From:** Carolyn Sygitowicz  
**Sent:** Wednesday, July 07, 2004 10:30 AM  
**To:** Pam Fox  
**Subject:** FW: Proposed bypass

-----Original Message-----

**From:** Starshaman@aol.com [mailto:Starshaman@aol.com]  
**Sent:** Thursday, July 01, 2004 12:37 PM  
**To:** MAYOR  
**Cc:** Nancy Davidson; Fred Butler; David Kappler; Russell Joe; Bill Conley; Joe Forkner; Hank Thomas  
**Subject:** Proposed bypass

I realized after reading about it in the Issaquah Press that the decision about the proposed bypass is still under consideration. I would like to state my position as an Issaquah resident that I am against it. I don't like the traffic down Front street any more than anyone else, but I feel the bypass will ultimately not solve the problem while damaging our city environmentally. I am particularly concerned about the closeness of the bypass road to the Issaquah High School and other schools and feel it will be a harmful influence.

I know you all have a difficult time trying to satisfy so many different constituencies and opinions. I respect you all for the job you're doing. And I want you to know that if you are counting "votes" of public opinion in reaching decisions on this matter, please consider mine a no vote against the bypass proposal.

Sincerely,

David Spangler

1

2

1. and 2. The proposed project is intended to reduce existing congestion on Front Street. Potential impacts to school facilities are addressed, and mitigation measures are discussed, in Chapter 3 of this Final EIS.

**Pam Fox**

---

**From:** Carolyn Sygitowicz  
**Sent:** Wednesday, July 07, 2004 10:23 AM  
**To:** Pam Fox  
**Subject:** FW: Bypass

-----Original Message-----

From: Jangles@aol.com [mailto:Jangles@aol.com]  
Sent: Friday, July 02, 2004 9:56 AM  
To: MAYOR; Nancy Davidson; Fred Butler; David Kappler; Russell Joe; Bill Conley; Joe Forkner; Hank Thomas; Bob Brock  
Subject: Bypass

I am against the by-pass for many reasons I won't go into here since you won't read it. Suffice it to say that I would like very much to see it not go through. The traffic is much better since the Sunset interchange went in. Let's leave it at that.

Sincerely,

Julia Spangler

1

1. Your comments have been noted and will be considered in the City's decision for this project.

**Pam Fox**

**From:** Carolyn Sygitowicz  
**Sent:** Wednesday, July 07, 2004 10:23 AM  
**To:** Pam Fox  
**Subject:** FW:

-----Original Message-----

**From:** FREYA SECREST [mailto:fseacrest@msn.com]  
**Sent:** Friday, July 02, 2004 12:21 PM  
**To:** MAYOR  
**Subject:**

Dear Council Members,

I am writing to voice my opposition to the bypass road being considered for Issaquah.

It will adversely effect the school environment for our children in the nearby schools, the impact on our local aquifer for future generations is under-represented, and the noise pollution added to our Issaquah valley environment will bring down the quality of life for the town and its residents.

Please do not accept the bypass project and do not authorize more tax money to study it.

Thank you

Freya Secrest  
280 SW Gibson Lane  
Issaquah, 98027

1

2

1. and 2. Your comments have been noted and will be considered in the City's decision for this project. Noise impacts, and impacts on water quality, schools and the local community, along with proposed mitigation measures, are discussed in Chapter 3 of this Final EIS.

7/7/2004

Mr. Brock,

My concerns for the SE bypass are: the aquifer – please don't destroy the recharge area.

Flooding if many trees are removed to make the bypass.

Noise and pollution when the traffic backs up on Hobart Road.

The neighborhood that will be destroyed as well as the beauty of the south end of the city.

Please consider the "NO BUILD OPTION."

Thank you.

Jean Nye  
620 SE Kramer Place  
Issaquah, WA 98027

RECEIVED

JUN 30 2004

PUBLIC WORKS ENG.

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2

3

4

1. Potential impacts on groundwater recharge indicate that, at worst, the proposed project would result in a 0.10 percent (1/1000) reduction of total recharge volume in the Lower Issaquah Valley aquifer. If additional testing confirms infiltration potential for stormwater ponds, no reduction in aquifer recharge would be expected because nearly all runoff from the proposed roadway would be infiltrated.

2. Stormwater drainage and flood protection measures would be provided. With mitigation, the proposed project is expected to result in no effect on 100-year flood levels in the project area.

3. The proposed project is not expected to result in substantial impacts on noise or air quality in the project area. Please see Chapter 3 of this FEIS for more information on noise and air quality impacts for Modified Alternative 5.

4. Your comments have been noted and will be considered in the City's decision for this project.

**Pam Fox**

**From:** Carolyn Sygitowicz  
**Sent:** Monday, July 12, 2004 10:44 AM  
**To:** Ava Frisinger; Leon Kos  
**Cc:** Cathleen Koch; Bob Brock; Pam Fox  
**Subject:** FW: Follow the Vision - NO on SE Bypass

Ava – since this was not addressed to anyone at the City, I assume I don't send a response. Let me know if you think I should respond anyway. - cs

-----Original Message-----

**From:** Jim Sapienza [mailto:jsapienza85@hotmail.com]  
**Sent:** Saturday, July 10, 2004 5:03 PM  
**To:** Issaquah Press  
**Cc:** MAYOR; Nancy Davidson; David Kappler; Hank Thomas; Russell Joe; Bill Conley; Fred Butler; Joe Forkner  
**Subject:** Follow the Vision - NO on SE Bypass

Letter to the Editor  
The Issaquah Press  
PO Box 1328  
Issaquah, WA 98027  
isspress@isspress.com

Dear Editor:

**Follow the Vision – NO on SE Bypass**

After making a courageous attempt to digest the contents of the June 2004 EIS, I choose not to add to the cacophony of bullet points and dollar bills spent and wasted to date to study the feasibility of a SE Bypass. Follow the vision.

Let us consider the vision statement of our foothills community: The City of Issaquah is committed to quality living through preservation and enhancement of the community's unique human and natural resources.

The proposed SE Bypass will do nothing to preserve or enhance our resources. Issaquah is greatly defined by its relationship with Tiger Mountain. The proposed SE Bypass would serve to sever the city from the mountain.

The proposed SE Bypass will do nothing to preserve or enhance our resources. In a best case scenario, it will only funnel additional traffic into the city (the SE Bypass does not bypass the city but spears its mountain-bordered eastside) and the narrow, environmentally sensitive Squak Valley corridor. The proposed SE Bypass would clog the city and the valley.

Each of us needs to consider the reason we came to Issaquah and follow our interpretation of Issaquah's vision statement. The proposed SE Bypass would serve to sever the city from the mountain. The proposed SE Bypass would clog the city and the valley. Let's work together on other options to preserve and enhance our city, our mountain and our valley. I strongly urge you to express your preference for and vote for alternative #7 – No Action.

7/12/2004

1

1. and 2. Your comments have been noted and will be considered in the City's decision for this project. The proposed project is intended to reduce congestion on the Front Street corridor and improve access to freeway interchanges.

2

Page 2 of 6

Sincerely,  
Jim Sapienza

7/12/2004



**Pam Fox**

**From:** Carolyn Sygitowicz  
**Sent:** Tuesday, July 13, 2004 10:30 AM  
**To:** Pam Fox  
**Subject:** FW: South east bypass

-----Original Message-----

**From:** Roger & Charleen Vail [mailto:r.vail@verizon.net]  
**Sent:** Tuesday, July 13, 2004 10:21 AM  
**To:** www.citycouncil@ci.issaquah.wa.us  
**Cc:** MAYOR  
**Subject:** South east bypass

Dear Council Members & Mayor, July 13, 2004

My wife and I oppose going forward with the southeast bypass.

As a long time resident of the Issaquah area (30 years in Mirrormont), I feel that the planned bypass is not a wise use of 40 to 50 million dollars for one mile of road. The concept of funneling traffic off of Front Street and onto Issaquah-Hobart Road slightly further down the road does nothing to solve the congestion on Issaquah-Hobart Road which runs all the way to Mirrormont during the peak traffic periods. In addition, I can currently avoid Front Street by taking I-90/Sunset/2nd if I choose and it works very well without any upgrades.

To me, a better idea would be to spend these funds on the further extension of the four lane highway 18 which eventually should be a four lane road all the way to I-90. The sooner this is done the sooner the traffic on Issaquah-Hobart Road and Front Street will be resolved. At some point, perhaps a south east bypass that would go from highway 18 to the area of Highpoint could be built. This would open up an undeveloped area for developers and shorten the distance for those Issaquah-Hobart Road and Front Street commuters. In addition, this approach would not disrupt the community of Issaquah as far as property condemnations/wetland disturbance/excessive development on the Tiger Mountain hillside (Park Pointe) plus the proximity to the Issaquah high School.

With this in mind, I hope you make a wise decision on the southeast bypass to Issaquah-Hobart Road.

Sincerely,

Roger & Charleen Vail

15607 258th PL. S.E.

Issaquah, Wa 98027

7/13/2004

1

1. The proposed project would provide a new principal arterial to the east side of the city. Sunset Way (a minor arterial) and 2nd Avenue (a collector arterial) have lower functional classifications than the proposed project. As such, these roads are designed for lower traffic volumes than the proposed project and are not intended to provide primary relief for traffic congestion on the Front Street corridor. The City has expressed concern regarding the impacts of "cut-through" traffic on the Old Towne neighborhood associated with the use of Sunset Way and Second Avenue as routes to local freeway interchanges. The proposed project would provide a more acceptable route for pass-by trips that do not require local access.

2

2. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but these alternatives are not reasonable because they are not effective in reducing congestion.

**Pam Fox**

**From:** Carolyn Sygitowicz  
**Sent:** Wednesday, July 14, 2004 9:31 AM  
**To:** Pam Fox  
**Subject:** FW: A two year old letter

-----Original Message-----

**From:** Unclegrumpy [mailto:unclegrumpy@worldnet.att.net]  
**Sent:** Wednesday, July 14, 2004 8:58 AM  
**To:** City Council  
**Subject:** A two year old letter

Dear City Council,

Attached is a two plus year old letter I sent to Council, that in many ways is still relevant to the current SDIS discussion. My biggest grip with the SDIS is that for all the additional money spent, and promises given, this study fails to add much useful information to the DIS. I cannot see how this document helps those on the Council who are having trouble making their choice on the Bypass, because it simply avoids answering the many questions that were specifically asked of it by the Council. Given this fact, it seems the only logical choices are to either drop the Bypass "idea" all together, or spend more money to get the study right.

However one must ask, how much more of the taxpayers precious money will it actually take to get the tough questions addressed?

Thank you,

Cory Christensen,

Dear City Council,

While you might have a hard time believing this now, eight years or so ago, I thought the Bypass was a great idea. Until about three years ago, when more information regarding the actual details of the road started to come out, my view was coming up with a road that would bypass Front Street and thus improve the traffic downtown was just what we needed.

However, as the initial studies began to roll in, and two years ago were presented for public comment, it became clear that this road was not what it was cracked up to be. Especially disconcerting at the time was the utter pro-build bias in the alternatives presented, and the disregard for the impacts on residents, students, the environment, and the other aspects of community we as residents, business owners, and taxpayers cherish in Issaquah.

What is so galling to me now, is that the Consultants are claiming the blame for their drastic cost over runs is due to the City Council and Citizens asking tough questions to be answered that they say were not in the original scope of the project. If one boils this down, to me they are saying, "We never thought you would ask anything but where you wanted the pavement". Just because they forgot or thought nobody would ask, does not mean the taxpayers should be billed for work that is not well thought out or incomplete. I thought we paid these guys the big bucks to be smarter than the rest of

7/14/2004

1

1. Your comments are noted. The consultant has cooperated with city staff to reduce costs associated with design and evaluation of project alternatives. All requests for additional funding have followed appropriate guidelines and have been reviewed by city staff.

us, and to consider every detail. Frankly, I think we are being asked to overcharge ourselves for a job we have already committed \$2.4 million to. I was very disappointed at last night's COW meeting that this issue was not addressed.

To top it off, the Consultants response to Councilman Forkners previous request for an itemization of charges, was to produce in their response notes to Council, a chart with the running total of what they billed in large blocks. What the initial question was, was how much have we paid for each change and revision, how much time was billed to address each question, and how near each alternative or task is to being completed. The novel idea was that with the information of what things really cost, Council could actually manage this project, make intelligent decisions, and be good stewards of future taxpayers dollars

Also unacceptable in this process, is the job that the City's lead consultant, Lou Haff has done in keeping the Council properly informed. Somehow, he has grabbed the position of policymaker away from the Council. His management style of "handling" Council like a bunch of Kindergarteners due for their naps is both disgusting and appalling. The long non-answers to reasonable questions also leaves one thinking "does he really think we are **all** dumb enough to not to see through that smoke!" He has exhibited this time and time again in his presentations, and now in print in the recent notes you were presented. On his shoulders also directly rests the responsibility for failing to properly manage the bloated cost of this study.

I think now is the time to start to hold the Consultants and City Staff accountable for the work they produce. Before we spend more money in exactly the same way, it is time we safeguard the process, so we actually get what we pay for with this next \$500k to \$750K. Lets get the strait facts, so an informed decision can be made.

To accomplish this, I would like your upcoming agenda bill to address the following:

First, before we spend more than the \$2.4 million thus far committed, Parsons Brinkerhoff should be asked to present a complete full detailed report of the work they have done to date. This report should include the level of completion they have met in each area, with a full breakdown of the hours billed and monies spent, and a preliminary review of all the data collected. An equally detailed breakdown and estimate of what it will take to complete the study should also be presented **before** any further funds are committed.

Second, the City Council asks the Mayor and City Manager to replace Lou Haff with another Consultant to act as the project lead for the City. It is time City Council had someone on their side, salutes their flag, and works this problem as their servant, rather than always as an antagonist.

This would have the added benefit of forcing a qasi audit of the work that has been done to date, because it would force the new Consultant to analyze this project from top to bottom. Maybe, just maybe, a fresh viewpoint might also uncover an alternative that none of us have considered, or a compromise that would be more pleasing to all.

Third, it is time the Consultants and Staff provide only unbiased, well thought out facts, and results, and **NOT** make policy decisions for Council. Let our elected officials do the job they are elected to do.

One final note of interest regarding last night's meeting. In speaking to some "Yes" Bypass people

7/14/2004

2

2. See Comment 1 above. Project costs were reviewed in detail by city staff and council members in May 2002. All requests for additional funds have followed appropriate city procedures.

3

3. The City has received your comments and appreciates your input.

outside, when asked if they lived in town, for most, the answer was no. Many worked in Issaquah though, and while their views are important, they do not vote here and thus will not be eventually asked to pay for this road. I think it is also important that you know that regardless of how this road is spun, and how much is spent on studies, the vast majority of those who actually live and vote in Issaquah, once they look over the facts and alternatives the studies have already provided us, are solidly against building the Bypass.

Sincerely,

Cory Christensen

7/14/2004

**VIRGINIA CHONG**

1106 Lewis Lane S.E. • Issaquah, Washington 98027

July 15, 2004

City of Issaquah, Public Works Department  
Attn: Bob Brock, Public Works Director  
P.O. Box 1307  
Issaquah, WA 98027

*RE: Comments on SE Bypass SDEIS*

Dear City of Issaquah:

As owner/resident at 1106 Lewis Lane SE and a member of the Lewis Lane SE neighborhood, I would like to comment on the Southeast Bypass Supplemental Draft Environmental Impact Statement ("SE Bypass SDEIS"). My brief comments are bulleted below:

▪ **Lewis Lane SE neighborhood impact and quality of life.**

Please consider the impacts to the neighborhood. If alignment is chosen to divide the neighborhood and remove some homes, it will reduce the small neighborhood cohesion and affect the makeup of the Lewis Lane SE neighborhood area. In addition, it will impact the quality of life in the immediate area. There will be increased risk to personal safety for residents and their pets, plus increase noise pollution and reduce air quality. I have asthma and the reduced air quality will force me to leave. I have a lot of concern over increased flooded risks, and although it appears there are mitigated measures, there is no certainty that these will work. Our neighborhood also is home and a corridor for wildlife. Neighbors have sighted bears, deer, coyotes, owls, weasels, a variety of birds, and even fish along nearby tributaries to Issaquah Creek. SE Bypass will affect this wildlife corridor and reduce the environmental value of Issaquah. Wetlands in the area will be impacted, with reduction of buffers and potentially impacting high-class wetlands. Accessibility to trails to Tiger Mountain will be affected and limited, reducing not only quality but also will increase personal safety risk to those trying to access the trails. SDEIS proposes what may be a 4-7 lane roadway. Many of my friends and family who visit are impressed with the natural beauty of this area, and that would be reduced or removed by the presence of a major road that serves as a truck route and commuter pass-through road.

▪ **Questionable impacts to traffic problem.**

I question the ability to reduce traffic congestion. The SDEIS does not fully consider the current traffic impact by the opening of the new Sunset Way Interchange. My personal observation is that this has greatly reduced the congestion along Interstate 90 (I-90), as Sammamish residents have additional access, and commuter trying to reach the southern end of downtown Issaquah can bypass the traffic along Front St. There are also unknown impacts of the widening of State Route 900 (SR900).

In addition, traffic reduction ability will likely be reversed by increased pressure due to development and then opening of Park Pointe and other urban growth further south. There are additional opportunities to work on Issaquah traffic, such as congestion along Gilman Boulevard and Front Street. Traffic light synchronization may help. Better or more signage to help those drivers just wanting to commute through or are trying to reach other areas of the City. Signage along I-90 as well as throughout the City, along with free maps or encouraging businesses to participate in public education about best routes will help reduce congestion just along one route. Perhaps improving other routes can be encouraged (reduction of congestion, adding trees, types of businesses along the way, etc.). These are alternative considerations beyond just adding more lanes for capacity. There is little consideration to transit services to help improve traffic.

▪ **Other risks.**

Other risks include contamination of the aquifer. Some of our water comes from this area, and I am concerned over the ability to work on the stormwater as part of SDEIS. A major roadway cut along hillsides increases potential of land slides. This will also affect aesthetics and reduce the charm of the Issaquah area as forested areas are replaced with roads and retaining walls. It is also unclear as to the impacts of a regional roadway to businesses in the area.

Please consider an option that will least affect the Lewis Lane SE neighborhood and Issaquah. Thank you.

Sincerely,

  
Virginia Chong

RECEIVED

JUL 19 2004

PUBLIC WORKS ENG.

1:30 PM

1

1. Potential community impacts have been considered and are identified in Chapter 3 of this Final EIS. The proposed project would change the community character by contributing toward a more urban setting at the eastern edge of the city. Mitigation measures for community impacts also are included in Chapter 3.

2

2. Traffic modeling in the DSEIS and in this FEIS does include operation of the I-90 Sunset Interchange for both the year of opening and future operations by 2030. Traffic data for the proposed project indicate that Modified Alternative 5 would substantially improve operations for north-south travel conditions and accessibility to I-90 from Front Street and the proposed SE Bypass roadway.

3

3. The proposed project is expected to support development already planned by the city and is not expected to increase local development pressure. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but these alternatives are not reasonable because they are not effective in reducing congestion.

4

4. Your comments are noted. Potential impacts on water quality, soils, visual quality, and economics associated with Modified Alternative 5 are addressed in Chapter 3 of this Final EIS.

**Pam Fox**

**From:** Bob Brock  
**Sent:** Tuesday, July 20, 2004 10:13 PM  
**To:** Carolyn Sygitowicz; Pam Fox  
**Subject:** FW: SE Bypass DSEIS Comments

Other one from John.

-----Original Message-----

**From:** John MacDuff [mailto:johnntty@hotmail.com]  
**Sent:** Tue 7/20/2004 9:16 PM  
**To:** Bob Brock  
**Cc:**  
**Subject:** SE Bypass DSEIS Comments

Bob Brock  
Public Works Director  
City of Issaquah

Mr. Brock,

I am concerned that the DSEIS presents a comparison between the various Alternatives which does not fairly or truly represent these Alternatives as they would be implemented. All of the Alternatives except Alternative 7, the No-Build Alternative, have mitigations applied to their short comings. To make a fair comparison, a similar position needs to be taken with the No-Build Alternative.

It is not reasonable to assume that in not building the SE Bypass that no other measures would be taken to minimize any existing problems. In this case, things like the re-striping of 2<sup>nd</sup> Avenue to provide a left turn lane (which is already planned), extending the South bound left turn lane from 2<sup>nd</sup> Avenue to Front Street to hold additional cars, and widening the right turn from North bound Front Street to 2<sup>nd</sup> Avenue could dramatically improve the flow of traffic at that intersection. Extending the sidewalks along 2<sup>nd</sup> Avenue would improve the pedestrian safety. Adding a traffic light at 2<sup>nd</sup> Avenue and Sunset Way, and adding a right turn lane to North bound 2<sup>nd</sup> Avenue at Sunset Way, would improve traffic flow at that intersection. Synchronizing traffic lights all over town, widening Newport Way, and adding a 3<sup>rd</sup> undercrossing of I-90, are other changes that would improve the ratings of the No-Build Alternative.

Taking these and similar improvements to the existing roadways into account will give us a better and truer comparison of the Alternatives and allow us to reach the right solution.

Thank you,

John MacDuff  
Downtown Issaquah  
620 SE Bush St  
206-989-9761

7/21/2004

1

1. Mitigation measures are considered for the No Action alternative in the SDEIS. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but these alternatives are not reasonable because they are not effective in reducing congestion.

**Pam Fox**

**From:** Bob Brock  
**Sent:** Tuesday, July 20, 2004 10:12 PM  
**To:** Carolyn Sygitowicz; Pam Fox  
**Subject:** FW: SE Bypass DSEIS Comments

One more to follow from him. NObody else copied though.

-----Original Message-----  
**From:** John MacDuff [mailto:johnntty@hotmail.com]  
**Sent:** Tue 7/20/2004 10:04 PM  
**To:** Bob Brock  
**Cc:**  
**Subject:** SE Bypass DSEIS Comments

Bob Brock  
Public Works Director  
City of Issaquah

Mr. Brock,

At certain times of the year when the water table is up all over the area, it is routinely within 6 feet of the surface down on the flat at the end of Bush Street and Andrews Street below the proposed location of the SE Bypass Road. I would not be surprised to find that the water table was similarly close to the surface across this hillside. I am concerned that the DSEIS does not address what happens when the hillside is deeply cut to make way for the road and exposes this water table. Remember the flooding problem Level 3 had with their tunnel to get up to Lake Tradition. A water source like this could easily cause significant damage to the proposed retaining walls and the homes below. Remember the Camp Creek Blowout earlier this year along the retaining wall on the North side of I-90.

Also, what would be the impact of a significant amount of ground water being added to the storm runoff, and how would the retention ponds handle it. Not well at all, I would expect.

Thank you,

John MacDuff  
Downtown Issaquah  
620 SE Bush St  
206-989-9761

1. Please see response for the Issaquah Alps Club letter dated July 30, 2004 in this FEIS. In addition, the "Landslide Hazard" delineation should be removed from the north portion of the Bypass alignment because, based on our knowledge of subsurface conditions, the area does not meet the definition criteria for this critical area. However, this same area is considered a steep slope hazard area which requires more stringent subsurface exploration, design considerations and construction issues compared with a landslide hazard area.

Landslide hazard areas, in a classic sense in the Puget Sound lowland, are areas where permeable soils overlie impermeable soils (for example, sand over silt). Also associated with this classic geologic sequence for landslide hazards, is ground water that occurs within the sand soils immediately above the silt interface, which is then truncated by a slope. This emerging ground water is often, but not always, observed as springs or "seeps" on a hillside. These conditions (sand over silt with regional ground water emerging in slope areas) were not observed at north end of the SE Bypass alignment. We expect that ground water emerging within the slope face is likely masked by the weathered soils that mantle the slopes which is a common condition throughout the Puget Sound lowlands.

1

Ground water was observed in many of the test borings completed for the DSEIS. This ground water was encountered at depth in most of the test borings, and did not occur at an elevation where it may intersect a slope. However, as described in the response for the Issaquah Alps Club, additional subsurface exploration is required to further evaluate soil and ground water conditions as a basis for design of the Bypass project.

2

2. Potential impacts on groundwater recharge indicate that the proposed project would result in a 0.10 percent (1/1000) reduction of total recharge volume in the Lower Issaquah Valley aquifer. If additional testing confirms infiltration potential for stormwater ponds, no reduction in aquifer recharge would be expected because nearly all runoff from the proposed roadway would be infiltrated.

7/21/2004

**Pam Fox**

**From:** Bob Brock  
**Sent:** Monday, July 26, 2004 7:55 PM  
**To:** Carolyn Sygitowicz; Pam Fox  
**Subject:** FW: DSEIS Comment

Another email weighing in on the bypass from John.

-----Original Message-----  
**From:** John MacDuff [mailto:johnntty@hotmail.com]  
**Sent:** Mon 7/26/2004 6:49 PM  
**To:** Bob Brock  
**Cc:**  
**Subject:** DSEIS Comment

Bob Brock  
Public Works Director  
City of Issaquah

Mr. Brock,

I am concerned that the DSEIS does not come close to covering Visual Quality impacts. To adequately cover this subject would require accounting for every place that would have any view of the road or its supporting structures and support facilities. As a minimum, each parcel of land that would have a view should be accounted for, either by itself, or combined with other parcels that have the same view. It would not be adequate to combine the view impact from 6<sup>th</sup> Avenue E. and Bush St, with the view from 2<sup>nd</sup> Avenue E and Bush St. Although both would be looking at the same features, one is many times closer and the extent that the features dominate the view is quite different. From the 6<sup>th</sup> and Bush St. location looking East and South, a 35 to 40 foot high concrete wall that extends 100 yards in both directions will dominate the view. This is the "feature" which the report claims reduces the visual quality from 6.33 to 6.25.

First of all I would increase the visual quality rating for the existing view to closer to 7.00. 100 foot plus Douglas Firs, Maples and natural underbrush dominate the view. The dominance of the concrete wall should drive the rating closer to a 5. This makes me question all the ratings. How much will the property values in the affected areas be reduced with this new "feature"? That would be a better indicator of the true impact.

Thank you,

John MacDuff  
Downtown Issaquah  
620 SE Bush St  
206-989-9761

7/27/2004

1

1. A visual quality assessment for the proposed project area was conducted at several locations within three general viewsheds. The SDEIS visual analysis followed appropriate state and federal guidelines and was reviewed and approved by FHWA and WSDOT prior to issuance of the SDEIS. Graphics provided in the visual quality analysis are intended to be representative of views in different areas along the proposed project route and do not attempt to cover every view possible view angle.

View ratings are subjective and may be dependent on individual viewer sensitivities. Existing topography and vegetation obscure views from locations near the northern project area. Therefore, ratings indicative of small degrees of expected change from those locations reflect these conditions. As noted in the economics analysis, property values are determined by many factors including current economic conditions. The proposed project is not expected to substantially influence local property values.



Jim and Kathryn Sapienza  
1480 Hillside Drive SE  
Issaquah, WA 98027  
425-427-9629

July 18, 2004

Mr. Bob Brock  
Public Works Director, City of Issaquah  
PO Box 1307  
Issaquah, WA 98027

Dear Mr. Brock:

Let's follow the vision. Consider the vision statement of our foothills community: The City of Issaquah is committed to quality living through preservation and enhancement of the community's unique human and natural resources.

The proposed SE Bypass will do nothing to preserve or enhance our resources. Issaquah is greatly defined by its relationship with Tiger Mountain. The proposed SE Bypass would serve to sever the city from the mountain.

The proposed SE Bypass will do nothing to preserve or enhance our resources. In a best-case scenario, it will only funnel additional traffic into the city (the SE Bypass does not bypass the city but spears its mountain-bordered eastside) and the narrow, environmentally sensitive Squak Valley corridor. The proposed SE Bypass would clog the city and the valley.

When we read the Purpose of the SE Issaquah Bypass Project summary statement, we cannot understand how this 1-mile connector road solves the regional traffic issues. We look to other solutions. We talk about traffic in Issaquah and the greater Puget Sound area as bad. It does not compare to other western cities like LA, San Francisco and others. Solutions in those communities are to build, bigger arteries. Yet, other cities like Portland and Vancouver, BC look to other regional alternatives like bike trails, bus transit, and regional rail lines.

**1. Consider the following deficiencies in the June 2004 Draft Supplemental Environmental Impact Study (DSEIS).**

- We have been in the community since 2001, so we were not present when the other options for a bypass were considered. In the DSEIS, the first major flaw of the analysis is obvious. When all the projects were gridded for pass/fail based on selected criteria, the SE Bypass option had a majority of F or "fail" grades. Other options such as Newport Way and May Valley Road received a majority of P or "pass" grades. In lieu of the overwhelming problematic data in the DSEIS, these and other cost-effective options should be revisited. Why were these options not favored over the SE Bypass?

1

1. and 2. Your comments have been noted and will be considered in the City's decision for this project.

2

3

3. Alternatives evaluated and graded during the alternatives analysis are identified in Table 2-1 of the DSEIS. As indicated in that table, only Alternative 1 (Front Street South to I-90 Interchange) received all passing grades. Both Newport Way and the May Valley Roadway (Alternatives 8 and 9 in Table 2-1) were identified as receiving three separate failing grades each under the alternatives screening criteria. Alternatives receiving failing grades were not advanced for further environmental evaluation.

- The wetlands analysis appears to be flawed. As naturalists who have walked the land in question, the Issaquah Creek, its defined 100-year floodplain in the DSEIS, and the 4 separated wetlands are in fact all connected. What are the results of a wetlands analysis for environmental impact based on one wetland system?
- The traffic management report is very outdated. Can you provide updated traffic management data with the changes since the traffic study was performed?
- With the SE Bypass construction encouraging more traffic through the Squak Valley corridor, what are the environmental and social impacts of the traffic to the valley? What are the traffic impacts to the city? What are the traffic impacts to the volume of traffic in the corridor and in the Issaquah city limits?
- In full disclosure, it seems reasonable that the DSEIS would state who would benefit from the SE Bypass Project. Real estate investors are a select category, and specifically those involved in the proposed Park Pointe project. A probable conflict of interest would exist for those community members who have speculated in investing in that project. Who are the investors in the Park Pointe development project?
- The DSEIS shows the construction of 2 barrier walls for a total of 50 feet in height. Beauty and sound issues are problematic with the proposed construction. Disruption of human and animal travel to Tradition Plateau is compromised by their construction. Why are these necessary? The impacts of these walls are inadequately addressed in the DSEIS? What are the consequences of these walls? One access corridor is mentioned in the DSEIS over a 1-mile stretch. IS this enough? What are the real needs of travel and what re-proposed mitigation efforts are necessary to permit human and wildlife travel be maintained between the city and the mountain?
- Many species are threatened by the project (including homo sapiens!). The wildlife habitat portion of the biological assessment does not address mammals at all. Also, it specifically states that the SE Bypass Project "may effect and is likely to effect" Chinook Salmon. What can be done to protect, and not further threaten endangered species as Chinook Salmon? What can the DSEIS do to address bear, deer, bobcat, raccoon, cougar and other mammal populations in the study area?

## **2. Consider other solutions:**

- Further study of traffic patterns with new and recent completed projects (Sunset Interchange, 2<sup>nd</sup> Avenue alterations, Rte. 900/Newport Way expansion), and future projects.
- Better-synchronized traffic lights.
- Use of roundabouts.
- Development of parking for Olde Towne business access.
- Re-structure tenancy of Olde Towne to viable, community oriented businesses that draw business of city residents.
- Moratorium on building south of the city for northbound traffic limitations on Issaquah-Hobart Road.
- Placing signs along the entrances to the Squak Valley / Issaquah-Hobart Road corridor stating "Local Traffic Only" and then enforcing it. Affordability? A

4

4. Since issuance of the SDEIS, Modified Alternative 5/Alternative 5/Modified Alternative 5 has been selected as the only build alternative that can be effectively mitigated. Wetland impacts and mitigation measures for Modified Alternative 5 are presented in Chapter 3 of this Final EIS. A new wetland mitigation plan for Modified Alternative 5 also has been prepared and is provided in the appendices of this Final EIS.

5

5. The existing year 2000 data was the most recent data available when the project was initiated. The existing data provides information on traffic conditions experienced. The opening year analysis has been modified to reflect Year 2010 for the No-Action scenario and for the Build Scenario (Alternative 5)

6

6. The Park Pointe development is currently undergoing separate environmental review by the City of Issaquah. The proposed SE Bypass would support development planned for the Park Pointe project, however, the purpose and need for the SE Bypass is not related to that development. Park Pointe Development can proceed without the SE Bypass project. It would have access off of local streets and is not dependant upon the Bypass project.

7

7. Retaining walls in the north project area would be needed because cuts in the hillside would be required to accommodate the proposed roadway. Visual quality and noise issues for Modified Alternative 5 are addressed in Chapter 3 of this FEIS. Through a series of meetings with federal and state resource agencies in 2005, the City has agreed to initiate and participate in a study and planning effort to address issues concerning regional wildlife movement and connectivity.

8

8. Impacts on wildlife are addressed in Chapter 3 of this Final EIS. A new Biological Assessment is being prepared for Modified Alternative 5 and will be distributed with this Final EIS. The proposed project is not expected to have adverse impacts on threatened or endangered species.

9

9. Many of these ideas have been considered in the past, as summarized in Chapter 2 of this Final EIS. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but these were not considered viable or effective in reducing congestion.

rough estimate for the cost and installation of as many as a dozen signs is less than \$4,000.

- Funding the completion of Highway 18 as a 4-lane highway to I-90.
- Diverting regional traffic to use Highway 18, Highway 900, May Valley Road and not to use the 2-lane, environmentally sensitive Squak Valley corridor of Issaquah-Hobart Road. How to divert? Signs, Tolling, City Permits, Transit, etc.

### **3. In regards to the criteria for the June 2005 City Council decision:**

#### **Technical Input – Is the SE Bypass Project Feasible?**

There are still so many questions unanswered. There are so many significant issues that are attempted to be explained away by the DSEIS through “mitigation” measures. There are other options and choices that must be examined. The SE Bypass Project is not reasonable and not feasible.

#### **Financial Input – Is the SE Bypass Project Affordable?**

The probable \$40 million + price tag is so outlandishly expensive for a 1-mile roadway that the SE Bypass Project is clearly not affordable.

#### **Environmental Input – Does the SE Bypass Project have negative social and natural environmental impacts?**

In summary, there are so many negative impacts:

1. Added danger to children from traffic hazards at Issaquah High School and Clark Elementary School.
2. Traffic noise, air quality loss, and loss of natural environment to Issaquah High School and Clark Elementary School.
3. Loss of city connection with Tiger Mountain, loss of school connection to natural outdoors.
4. Increased traffic congestion on Issaquah-Hobart Road. More traffic encouraged on all Issaquah City arterials from the South: Newport Way, Front Street, and 2<sup>nd</sup> Avenue.
5. Decreased access to wildlife. Interruption to current wildlife patterns of birds, insects, fish and mammals. Increased wildlife mortality, specifically from faster traffic, and the barriers created by a proposed Bypass, and 50 feet of retaining walls to trap animals and lead to falls of animals.
6. Reduced water quality and inadequately understood, studied, mitigated, and planned pollution control.
7. Inability to fully mitigate for the interconnected wetlands at the south end of the Bypass options due to the system of Issaquah Creek, its 100-year floodplain and the wetlands that connect on both sides of the existing Front Street.
8. And lastly, further **threatening endangered species such as the Chinook Salmon** of Issaquah Creek.

#### **What is the public's view of the project?**

Statements by city officials and project workers have indicated that public input is approximately 3:1 opposes to the project. If there are any doubts that the project is

unpopular, undesired and inappropriate, take the project to the people and have a popular vote. But if representative democracy in our community works, the City Council will listen to their constituents and cast their votes in a 3:1 ratio against building the SE Bypass at the end of their deliberations in June 2005.

Each of us needs to consider the reason we came to Issaquah and follow our interpretation of Issaquah's vision statement. The proposed SE Bypass would take away the beauty and charm of our community. It is planned as a catalyst to development like Park Pointe that would be over-development of a part of our state and city that is environmentally sensitive and should not be developed. Let's work together on other options to preserve and enhance our city, our mountain and our valley. The SE Bypass does neither.

For the unanswered questions and inadequately addressed issues in the DSEIS, because of the other options available to address traffic issues, we are in favor of alternative #7 – No Action.

Sincerely,  
Jim and Kathryn Sapienza

The block contains two handwritten signatures in blue ink. The first signature is 'Jim Sapienza' and the second is 'Kathryn Sapienza'. They are written in a cursive, flowing style.

CC: Ava Frisinger, Nancy Davidson, Fred Butler, Bill Conley, Joe Forkner, Russell Joe, Dave Kappler, Hank Thomas

Thomas N. Anderson  
837 Front Street South  
Issaquah, WA 98027  
email: tom.anderson@guidant.com  
July 17, 2004

RECEIVED  
JUL 21 2004  
PUBLIC WORKS ENG.

Bob Brock, Director of Public Works  
City of Issaquah  
P.O. Box 1307  
Issaquah, WA 98027

Re: Adequacy of the SE Bypass SDEIS Traffic Model (Technical Appendix F)

Dear Mr. Brock,

I find some aspects of the traffic model to be implausible. I am particularly concerned about the Level-of-Service (LOS) of the intersections at or near the southern terminus of the bypass. The SDEIS indicates that the May Valley/Issaquah-Hobart Road intersection is currently at LOS F(F) and will remain at F(F) in all scenarios (see Tables 5 and 6, pages 18 and 19 of Appendix F). The overall traffic flow on Issaquah-Hobart Road is expected to increase in the Full Build scenario (see Table 20) which will exacerbate the failure condition of the May Valley intersection causing queues to ripple toward Issaquah and disrupt the flow in the area of the bypass southern terminus. This happens, even now.

Injecting a couple of new lanes of traffic in the south end of town will have a very predictable result – the level of service of the south-end intersections will be degraded by the bottleneck effect of Issaquah-Hobart Road. I have performed a simulation of my own, which is illustrated below:



1

1. and 2. Your comments are noted and will be considered in the City's decision for this project.

The bypass should not be built without concurrent improvements to the intersections on Issaquah-Hobart road to increase the carrying capacity of that road. Failure will to do so will result in worse, not better, traffic conditions in the south end of the town.

2

Regards,

A handwritten signature in blue ink, appearing to read "Thomas N. Anderson". The signature is stylized with a large, sweeping initial "T" and a long horizontal line extending to the left.

Thomas N. Anderson

18721 SE 44<sup>th</sup> Place  
Issaquah, WA 98027  
July 20, 2004

RECEIVED  
JUL 23 2004  
PUBLIC WORKS ENG.

Bob Brock, Public Works Director  
City of Issaquah Public Works Department  
P. O. Box 1307  
Issaquah, WA 98027

Dear Mr. Brock:

I am concerned about the proposed Southeast Bypass for several reasons.

I am a founder of the Issaquah Alps Trails Club and a former president of the Club. The proposed bypass will adversely affect the quiet on the Tradition Lake Plateau, a hiking area for many local and regional residents. The High Point Trailhead is the most popular hiking trailhead in Washington State. It seems ironic for Issaquah's motto to be "The Trailhead City" when the City is contemplating building a noisy roadway just below the plateau.

The noise generated by a roadway that is predicted to have high traffic use (2360 vehicles/hour SB) will be immense. I am very concerned about the impact this will have on students' ability to learn at the three schools near the proposed bypass. I am a teacher and know that noise distractions reduce student attention; thus, their learning.

There are several other impacts that concern me: habitat for wildlife, wetland and aquifer risks, air pollution, and general aesthetics in an area that many Issaquah folks treasure and about which we proudly boast. I question the benefits of moving more cars through town only to have them stack up at the Issaquah-Hobart Road or at I-90.

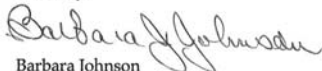
Perhaps some less expensive and more environmentally friendly means to reduce vehicular traffic on Front Street would be to build a Park and Ride near SR 18 and the Issaquah-Hobart Road and providing bus service from there. That could reduce the number of cars using Front Street to access the Issaquah Park and Ride. Building a third crossing of I-90 would certainly help reduce traffic on Front Street (and SR 900). And/or increase the capacity of 2<sup>nd</sup> Avenue.

The final reason I oppose the proposed bypass is that it may alleviate traffic within downtown Issaquah for only a short time. Historically, building a new roadway solves traffic problems for the short run. But for the long run, the roadway merely fills up sooner than predicted and creates more traffic headaches.

Issaquah suffers the effects of the last Ice Age: narrow valleys with wide plains on either end that invite development. There is no easy solution to solving Issaquah's traffic problems. However, building the bypass is not the solution. I oppose the proposed bypass and urge the City Council to discontinue studies and/or more planning on this project.

Thank you for allowing me to comment on this.

Sincerely,

  
Barbara Johnson

1. When noise levels are predicted to exceed 66 dBA in the State of Washington, a noise impact is identified. FHWA regulations (23 CFR 772) specify that when noise impacts are identified, abatement (mitigation) measures must be evaluated. If abatement measures are found to be both feasible and reasonable, then abatement measures must be incorporated into the project design. If an area exceeds 66 dBA, but does not meet both the feasibility and reasonableness criteria, noise mitigation is not required.

1 Noise analysis in the State of Washington must follow WSDOT's policy and procedures document. Please see the following website for the guidelines followed for this projects analysis:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/policies.htm>

The City of Issaquah is currently working with the Issaquah School District regarding the noise abatement proposed as part of the project.

2 2. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but these were not considered viable or effective in reducing congestion.

3 3. Your comments have been noted and will be considered in the City's decision for this project. Traffic analysis indicates that the proposed project's ability to accommodate projected traffic volumes would be diminished by 2030.

S.E. BYPASS SDEIS COMMENTS

RECEIVED  
JUL 26 2004  
PUBLIC WORKS ENG.

July 23, 2004

Public Works Engineering  
City of Issaquah  
P.O. Box 1307  
Issaquah WA 98027

To whom it may concern:

My SDEIS comments relate to Table S-1, beginning on Page S-23:

(Mitigation) *"did not meet WSDOT reasonableness criteria and was found to be 'unreasonable' or 'not feasible' based on FHWA \_\_\_\_\_ criteria. Therefore no mitigation is proposed."* Also, *"WSDOT reasonableness criteria"* offered as a reason for no mitigation proposed.

Perhaps I am missing something. But the fact that damage would occur does not disappear simply because we have not figured out a way to minimize it. The damage is acknowledged. Because we are not skillful enough to mitigate does not eliminate the *need* to mitigate. If you can't solve the negative environmental impacts of the proposed project, you have a FATAL FLAW. If you can't solve mitigation issues, you should not move forward. You just can't dismiss the environmental impacts.

With the logic offered in the SDEIS of "too expensive" or "not feasible" as grounds not to mitigate, it follows that the more ignorant we are the less we should have to do. If we're unskilled enough, we could save a lot of money on any project. I think the judicial system would laugh at this logic.

In summary, if you can't solve the environmental problems created by any of the "Build" alternatives, you have a Fatal Flaw stopping the project.

Respectfully,



Jackie Thomas  
Issaquah Resident

3105 DOUGLAS COURT S.W. • ISSAQUAH WA • 98027  
PHONE: 425-392-2272

1

1. When noise levels are predicted to exceed 66 dBA in the State of Washington, a noise impact is identified. FHWA regulations (23 CFR 772) specify that when noise impacts are identified, abatement (mitigation) measures must be evaluated. If abatement measures are found to be both feasible and reasonable, then abatement measures must be incorporated into the project design. If an area exceeds 66 dBA, but does not meet both the feasibility and reasonableness criteria, noise mitigation is not required.

Noise analysis in the State of Washington must follow WSDOT's policy and procedures document. Please see the following website for the guidelines followed for this projects analysis:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/policies.htm>



Pam Fox

From: Jim and Frances Hoganson [Hoganson9@earthlink.net]  
Sent: Tuesday, July 27, 2004 10:54 AM  
To: PamF@ci.IssaquahWA.US  
Subject: Re: Southeast Road

Reasons I believe the road should not be built:

1. The EIS studies have been wrong before and we do not know for sure where all old mines and tunnels may be in side of Tiger Mountain. We have also had evidence of man made systems failing in the slide onto the freeway this winter. 2. Many people who are for the road seem to really want easier access to all parts of Issaquah. A road over or under the freeway would help address that problem. 3. People living south of Issaquah realize that most of the back up on the way home is caused by the light at May Valley road. Funneling 3 roads onto a two lane county road at Issaquah is just going to make the back up longer. The county is not planning on widening Issaquah-Hobart road in the near future. It will also mean that people living on Issaquah-Hobart road will not be able to get out of their driveways for 2 or 3 hours twice a day. This is unfair. 4. Synchronizing lights through Issaquah old town would help move cars through town quicker. Also one way roads might be helpful. 5. The valley narrows south of town and pollution would be trapped in the valley and the widest area for it to flow would be back toward Issaquah and the plateau. I have seen this happen in areas of Seattle and know that air pollution can get very bad and affect people's health.

6. We have three schools that would be adversely affected by this road and I feel we owe it to the children of Issaquah to look out for their health better than that. I have lived south of Issaquah for 29 years and would have to start going to Maple Valley to do my major shopping. Many of my neighbors would be doing the same thing thus eroding Issaquah's customer base as we shop in Issaquah because it is very convenient and has most everything we need. I believe 2nd avenue could be used as another way for people to get through town to the freeway at a much lower cost and disruption to Issaquah old town. Frances Hoganson

1

1. Your comments are noted and will be considered in the City's decision for this project. Geologic conditions vary widely in the vicinity of the project area and landslides and other events occurring north of the project area are not necessarily indicative of conditions along the proposed project route.

2

2. Many alternatives have been evaluated during the EIS to determine the most effective approach for traffic congestion between I-90 and Issaquah-Hobart Road (see Chapter 2 in the Final EIS for a summary). In addition to the proposed project, City staff are considering other actions to address traffic concerns throughout the city's boundaries. Specific projects that may be proposed in the future would require separate environmental review.

3

3. The EPA (Environmental Protection Agency) has set National Ambient Air Quality Standards (NAAQS), which specify maximum concentrations for carbon monoxide (CO), particulate matter less than 10 micrometers in size (PM<sub>10</sub>), particulate matter less than 2.5 micrometers in size (PM<sub>2.5</sub>), ozone, sulfur dioxide, lead, and nitrogen dioxide. The project area is in compliance with these standards for all pollutants and the project meets all federal and state air quality requirements.

4

The Puget Sound Clean Air Agency (PSCAA) is responsible for monitoring, setting standards, and regulating development to achieve regional air quality standards in the King, Kitsap, Pierce, and Snohomish counties. For additional information regarding air quality in the region, please visit the PSCAA website at: <http://www.pscleanair.org> or call the PSCAA at 206-343-8800.

4. Your comments have been noted and will be considered for the Final EIS. Impacts to schools from Modified Alternative 5 are identified in Chapter 3 of this Final EIS. No decision has been made on what actions the City will pursue if the SE Bypass roadway is not constructed.

**Pam Fox**

**From:** Carolyn Sygitowicz  
**Sent:** Wednesday, July 28, 2004 10:59 AM  
**To:** Pam Fox  
**Subject:** FW: Issaquah Bypass

-----Original Message-----

**From:** James Morris [mailto:mrrsjs@msn.com]  
**Sent:** Tuesday, July 27, 2004 10:45 AM  
**To:** City Council  
**Subject:** Issaquah Bypass

**Issaquah Bypass**

The traffic problems of Issaquah are well documented and obviously in need of a solution. As it is now, to bypass the front street traffic, those who live in East Renton area use the short-cut pass the Issaquah High School to the Sunset interchange. The roads that are the bypass routes around the city of Issaquah are the responsibility of the State of Washington and King County. SR means State Route. SR18 and SR900 and the Issaquah-Hobart road between SR18 and Issaquah should be and must be widened to at least four lanes, something that should have been done 30 years ago. The Issaquah Bypass through Issaquah would not be needed if the state and county had done their job earlier. The only access road Issaquah needs is another I-90 crossover or under. The county and state are forever passing the cost onto the cities to pay for their responsibilities. If you don't believe me ask Newcastle who has taken responsibility and action to widen the Coal Creek Parkway.

Jim Morris  
20117 SE 146th St.  
Renton, WA 98059  
425-228-1185

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1. Your comments are noted and will be considered in the City's decision for this project. WSDOT is addressing capacity improvements on SR-900 and SR-18, and the city is pursuing the I-90 Undercrossing project as another north-south crossing of I-90. However, as discussed in the traffic analysis for the bypass, these do not significantly address the problem with congestion along Front Street. Chapter 2 in the Final EIS summarizes all alternatives considered that lead to the bypass as the Preferred Alternative.

7/28/2004

DATE: July 26, 2004

RE: SE Bypass EIS

FROM: Penny Miller  
15941 252<sup>nd</sup> Ave SE, Issaquah, WA 98027  
425-557-9496

TO: Bob Brock, Public Works Engineering, City of Issaquah  
Issaquah City Council

RECEIVED  
JUL 28 2004  
PUBLIC WORKS ENG.

My husband and I are 13-year residents of Mirrormont. We attended the SE Bypass meeting on July 15, 2004 to hear both sides of the Bypass debate. Admittedly, we came with the bias that the rural character of Issaquah-Hobart Road would be negatively impacted if the Bypass was built, and that the noise and traffic would make our own home much less livable.

In an effort to get information on the opposite point of view, however, we spent significant time before the meeting began with King County Councilman David Irons, whom we knew supported the Bypass.

Mr. Irons was very informative about what has transpired up to this point. In fact, we were even leaning in the direction of thinking the Bypass was not as impactful as we first thought. He told us, for example, that the King County Growth Management laws would not allow growth south of Issaquah except for 5-acre lots, nor would Issaquah-Hobart Road become more than two lanes.

However, there were two issues he could not answer to our satisfaction, and that is why I am writing you today, asking that they be considered and explored more fully in the "No Build" option of EIS before making your final decision.

First, the fact that Issaquah-Hobart Rd would not be expanded to four lanes, which we believe is a good thing in order to retain the rural character south of Issaquah, becomes a negative when you consider the current EIS is only looking at the amount of *existing* traffic coming and going through Issaquah down that road. It does not appear to consider the significant increase that having a Bypass will generate.

In light of this, we think that if you build the Bypass, traffic would increase; and although you may solve the problem of traffic going through downtown Issaquah, you would move that problem to Issaquah-Hobart Rd, which we

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1. Future year 2005 and 2030 were evaluated and results presented in the EIS (opening year 2010 analysis has recently been conducted). These future years accounted for traffic volumes with and without the SE Bypass.

believe would then be backed up all the way to Mirrormont or beyond.

Second, Mr. Irons told us that the bulk of the traffic was not coming down Issaquah-Hobart Road from Highway 18. He said the bulk of the commuters from South King County were coming down Cedar Grove Rd, SE Tiger Mountain Rd and May Valley Rd, and then getting onto Issaquah-Hobart Rd on their way to I-90.

So I asked whether any of the EIS options, particularly the "No Build," had investigated putting Park & Rides on those three roads, thereby putting commuters onto mass transit and taking significant numbers of single occupancy vehicles off Issaquah-Hobart Rd. I thought that would be a viable solution to the amount of traffic coming into Issaquah, especially in light of the future regional Transit Center planned for the existing Issaquah Park & Ride.

Mr. Irons told us that King County had investigated Park & Rides in those three locations and it was considered not to be cost-effective because not enough commuters would use them.

I think the P&R option should be looked at again before deciding to build the SE Bypass. I think circumstances have changed significantly since the first discussions of this Bypass years ago, and the EIS has not necessarily kept up.

The plan for a regional Transit Center in Issaquah is just one of these circumstances. Another is the increased cost of gasoline and our desire to become less reliant on foreign oil. A third is that for whatever reason, commuters are more inclined to use Park & Rides than in the past. We can't seem to build them fast enough. A fourth is that we are not in a budget surplus and have many more pressing priorities for the money.

I therefore ask that you please be more imaginative in your thinking around the "No Build" Bypass option. There are clear alternatives that would work much better, which would protect our environment, cost less, do less damage, and get cars off the road instead of tacitly inviting their increase by accommodating them.

I also ask that you consider the fact that those of us who live in unincorporated King County have little influence on this decision, as we do not vote for the Issaquah City Council, whose decision this is to make. We can only write letters such as this to get someone in a position of authority to listen to us.

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2. The Park and Ride option has been evaluated previously and it was concluded that given the cost, the P&R would not be utilized in this area. The team will verify with KC Metro regarding any planned improvements in this area. However, at this time no transit service extends south of Issaquah to serve potential Park-and-Rides in the locations that you describe.

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3. Your comments have been noted and will be considered for the Final EIS. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but these are not reasonable because they are not effective in reducing congestion. The No Action Alternative is not expected to result in travel pattern changes in Issaquah, based on projects planned in the City's current transportation improvement program plan. As summarized in Chapter 2, many alternatives to the Southeast Issaquah Bypass were evaluated in detail during project studies. Should the Southeast Issaquah Bypass not be constructed, the City would have to return to the planning process to re-evaluate those alternatives that were rejected in the past.

We are all at a crossroads. We have a choice to make about who we want to be as a community, now and in the future. You get to make that decision.

I ask you to be real stewards for us at this critical time. Please base your decision on who you know us to be, what we want to continue to be, and what we want to protect. Please do not make the decision that you know would be a short-term fix, and that would just encourage the development, traffic and smog that you know will inevitably come.

The SE Bypass is an old idea whose time has passed.

Thank you.



Penny Miller

NELSON ENNS

July 29, 2004

Bob Brock  
Public Works Director  
City of Issaquah  
Post Office Box 1307  
Issaquah, Washington 98027

RECEIVED  
AUG 02 2004  
PUBLIC WORKS ENG.

Hello:

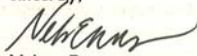
As a resident of Issaquah, it was of interest attending the recent Project Public Hearing and Open House and hearing the various comments and statements regarding the Draft Supplemental Environmental Impact Statement. Please incorporate the following in your considerations of that document. Any of these in and of itself should result in rejection of the SEIS as adequate.

1. The most notable, and critical, fallacy of the draft is the fundamental — and entirely unsubstantiated — assumption upon which it is based: that is, that the USA's petroleum energy-dependent way of life will continue to expand unabated in the future and that, therefore, traffic levels will continue to increase in and about Issaquah. Numerous future studies presently available for attention strongly disagree with this assumption, and, indeed, show there is very high probability that this nation's insatiable petroleum consumption will within a very few years be disrupted or dramatically changed. While the City of Issaquah cannot, of course, foresee everything that *might* affect it, reasoned consideration of such forecasts should certainly impel reluctance on the part of the City to waste millions of dollars on an unnecessary highway-building project. The absence of any note whatsoever in the SEIS of this potential change in traffic volumes is a significant failure and leaves the City of Issaquah seriously ill-informed as to the very issues the SEIS purports to address.

2. In reviewing the material contained in the SEIS, a second notable flaw becomes quickly evident: that is, the presumption that a bypass will be built and the omission (dismissal?) of any alternatives that do not include building it. In view of this, it certainly stretches credulity to believe the SEIS is either unbiased, provides the degree of information it is required by law to furnish, or that in its present form it in any way enables the City to make a well-reasoned decision in this matter.

3. Further review of the material contained in the SEIS lays bare a third notable flaw: the document itself concludes that the proposed bypass would result in only minimal traffic improvement — with even that improvement being lost within only three to five years. Approving a project so defective, at a public cost of tens of millions of dollars, can only be considered good stewardship by the willfully blind!

Sincerely,

  
Nelson Enns

300 QUEEN ANNE AVENUE NORTH, #309 • SEATTLE, WASHINGTON 98109 • TEL 425.394.1129 • NENNS@EARTH-LINK.NET

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1. Your comments are noted and will be considered by the City in the decision on this project. Also see Chapter 1 of this Final EIS regarding the purpose and need for the proposed project.

2

2. The process by which alternatives were identified, evaluated, and selected for further study in the EIS is summarized in Chapter 2. Many other alternatives were considered but rejected as being not reasonable because they are not effective in reducing congestion. Once those other alternatives are rejected, the EIS focuses on the specific alternatives identified in the EIS, as measured against the baseline as defined by the no-action alternative. Selection of the no-built alternative only means that the proposed SE Bypass as described in the EIS is rejected. It doesn't preclude going back to re-evaluate all the other alternatives that were previously rejected. However, the EIS provides a considerable amount of information that shows these other alternatives offer less effectiveness in reducing congestion. The decision then becomes whether a lower level of service is acceptable.

3

3. Your comments are noted. Traffic data for the proposed project indicate that Modified Alternative 5 would substantially improve operations for north-south travel conditions and accessibility to I-90 from Front Street and the proposed SE Bypass roadway.



Written Comments for Draft SEIS  
On the  
Southeast Issaquah Bypass  
July 29, 2004

RECEIVED  
JUL 29 2004  
PUBLIC WORKS ENG.

Too often it is said, "If you build it, they will come." In the case of the Southeast Bypass, we have yet to build anything, yet they come anyway. Under the Declaration of Independence we have the right to Life, Liberty, and the Pursuit of Happiness. Unfortunately, today we all too often pursue our happiness from within the automobile.

Since first we started discussions concerning the Southeast Issaquah Bypass (SEIB) some eight years ago there has been one significant transportation event in our area – the recent completion of Exit 18 on I-90, the northern terminus of the SEIB. That event has changed traffic patterns through Issaquah, yet too little is known of the new traffic patterns and their affect on Front Street and Second Avenue SE. Other than those traffic patterns, the original EIS and the new Draft SEIS cover the issues and the impacts. Engineering Design will be the time and place to answer questions raised in the public hearing. The attitude of too many of the people opposed to the SEIB is they don't want to be confused with facts. They don't like the project, and nothing said about the project in any way shape or form will convince them otherwise.

Is the Draft SEIS perfect? No. Is it adequate? Yes. Give us back our freedom, and give us back our downtown. Let us move forward, literally and figuratively, on this too important component of our road system.

One of my regrets is that we did not keep the SEIB as part of the Exit 18 and SPAR project. If that had been done, we would now be using the road, and there would be none of the complaints you now hear about the expense and impacts of the project, just as you don't hear any complaints since the completion of the Exit 18 and SPAR project.

The SEIB was selected only after a diligent search for alternatives. No feasible alternatives were found. We will continue to experience traffic growth in the next 25 years, and we must plan for and build the infrastructure that will allow us to continue our pursuit of happiness. They have come, let us build it.

Rowan Hinds  
1571 Sycamore Drive SE  
Issaquah, WA 98027

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1. Your comments have been noted and will be considered for the Final EIS.

7/29/04

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P: 425-391-4700 F: 425-391-9028  
1775 Twelfth Ave. NW, Suite 101 Issaquah, WA 98027  
www.portblakely.com

RECEIVED  
JUL 29 2004  
PUBLIC WORKS ENG.

July 27, 2004

Bob Brock  
Public Works Director  
City of Issaquah  
1775-12th Ave. NW  
PO Box 1307  
Issaquah, WA 98027

RE: Support for SE Bypass

Dear Mr. Brock:

Port Blakely supports building the Southeast Bypass. The Bypass is an important element of a regional traffic mitigation plan that includes several significant transportation projects that have recently been completed, such as the Sunset Interchange and Highlands Drive. This network of improvements was designed to improve existing traffic congestion problems on the Sammamish Plateau and Issaquah, as well as to accommodate future growth planned for by Issaquah and King County under the Growth Management Act. The Bypass is a key link in this system of improvements and should be constructed.

The Bypass will provide improved mobility in the City for Issaquah's residents. A decision not to build the Bypass will result in ever-increasing traffic on Front Street and erode the livability of downtown Issaquah.

The Bypass project has undergone extensive environmental study and analysis. The significant impacts that might arise from construction have been identified, and mitigation has been proposed to address these impacts. The extensive number of studies required for the project have increased the cost of the project and significantly delayed the construction of a needed improvement. Enough studies have been performed to allow the City to proceed with a decision.

We recognize that funding a major regional project such as the Bypass is a challenge, however, the City has commitments for local funds. The City will very likely be able to attract regional and State funding based on 1) the need for the project, 2) the fact that there is local funding, and 3) the progress the City has made in designing and permitting the project. The lack of full funding of this stage of the Bypass project should not be a

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1. Your comments have been noted and will be considered for the Final EIS.



Page 2  
Support for SE Bypass  
July 27, 2004

reason to stop the project. The Sunset Interchange was also not fully funded at the EIS stage of the project, yet funding was obtained and it was successfully completed.

We encourage the City to complete the EIS process, select the preferred alternative for engineering and design, and build the project.

Sincerely,

PORT BLAKELY COMMUNITIES

A handwritten signature in blue ink, appearing to read "John L. Adams".

John L. Adams  
Senior Vice President  
Real Estate

JA/kh



1035 116th Avenue NE  
Bellevue, WA 98004  
(425) 688-5000  
www.overlakehospital.org

July 26, 2004

Issaquah Mayor and City Council  
PO Box 1307  
Issaquah, WA 98027

Dear Honorable Mayor and City Council:

Please accept this letter as our support for the SE bypass. Based on population growth estimates in Issaquah and the surrounding areas, traffic congestion is expected to increase significantly over the next five years. We believe the SE bypass will help preserve the Issaquah community, while more effectively directing traffic to I-90.

As a local healthcare provider, we believe the transportation infrastructure is critical to ensuring local patients have immediate access to medical care. The bypass will relieve congestion on Front Street and provide surrounding area residents better access to critical medical services.

We realize there are concessions to constructing the SE bypass; however, we believe the alternative of not building the bypass at this time will result in higher costs and more disruption to our community.

Please vote for the bypass.

Respectively yours,

Darin E. Libby  
Administrator  
Overlake Medical Center Issaquah

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1. The City has received your letter and appreciates your input.

RECEIVED

JUL 30 2004

PUBLIC WORKS ENG.

**Pam Fox**

**From:** Carolyn Sygitowicz  
**Sent:** Friday, July 30, 2004 1:34 PM  
**To:** Bob Brock (Bob Brock); Pam Fox  
**Subject:** FW: Bypass Support

-----Original Message-----

**From:** Bernadette E. Anne [mailto:be\_anne@msn.com]  
**Sent:** Thursday, July 29, 2004 11:32 PM  
**To:** City Council  
**Subject:** Bypass Support

City Council Members and Mayor:

I was unable to attend the Bypass meeting due to a scheduling conflict. However, I would like to enter my comments into the record of public testimony.

While I am not in a position to comment on the validity/completeness or accuracy of the EIS statement, I do feel I can comment on the need for a Bypass.

I personally do not shop in downtown Issaquah or venture through town at certain hours simply because I know there will be the likelihood of standing traffic that would delay or completely mess up my day's schedule. And I also have a business where the majority of my clients are women who live in the Issaquah area. They would LIKE to shop at the downtown businesses but, like me, they avoid the area due to traffic. Many of my clients are moms and when you have a family and kids, you cannot afford to be delayed, stuck in traffic, when you are to meet a school schedule, or with kids in the car, etc. They simply won't take the risk. We all love some of the downtown businesses, like Fischer Meats, but simply cannot afford the time it would take, or the gamble of time, to get there and back. And, therefore, we shop elsewhere. And that's sad.

Some opponents seem to be concerned that a Bypass route would hurt downtown businesses since it would take traffic (and potential customers) off Front Street. I sincerely disagree. The problem now is that the businesses have no idea of the business that they don't get, due to the traffic stalemates, so the negative impact of the traffic stalemates cannot be accurately measured.

I live 300 ft from the new intersection at Issaquah Pine Lake Road and Issaquah Fall City Road, in the Klahanie PAA area the city has labeled the southern triangle. Before the Sunset interchange was opened for Plateau traffic, I could wait upwards of 30 minutes to crawl from my road down Issaquah Fall City Road so that I could get onto I-90. And then the Sunset interchange was built and now if I want to go directly to I-90, I can. However, before the interchange was built, there definitely were times I would not go down the Issaquah Fall City road, into Issaquah, to even shop because I knew I could possibly be stuck in awful traffic. However, now, post-interchange, I don't question whether I can make it easily to Home Depot/Fred Meyer or towards Gilman Blvd because I don't have a reservation that traffic, only waiting to pass through to get onto I-90, is blocking the streets because that traffic is now using the new Sunset interchange.

I parallel my experience and decision-making to what is happening with Front Street. If a bypass is built, those commuters who only pass through Issaquah, on their way to/from I-90 to other towns, will choose to take the more direct route and will be removed from the streets of downtown Issaquah. This will free up the traffic so that those of us who want to shop, will shop, because we know we can get there and back in a reasonable amount of time.

Please do not delay your decision on the Bypass. We need it and our businesses need it before it's too late. Businesses on Front Street can't survive forever, teetering on the edge.

Thank you  
Bernadette E Anne  
5008 240 AVE SE  
Issaquah WA 98029  
425-391-0297

1

1. Your comments have been noted and will be considered for the Final EIS.

Bryan A

Page 1 of 1

**Pam Fox**

**From:** Carolyn Sygiltowicz  
**Sent:** Wednesday, July 07, 2004 10:55 AM  
**To:** Pam Fox  
**Subject:** FW: Support for the SE Bypass

-----Original Message-----

**From:** Bryan@strategicpartnersllc.net [mailto:bryan@strategicpartnersllc.net]  
**Sent:** Wednesday, July 07, 2004 7:42 AM  
**To:** MAYOR  
**Subject:** Support for the SE Bypass

Dear Mayor,

As a 12 year resident of Issaquah I wanted to let you know that I fully support the completion of the SE Bypass project. This process has taken entirely to long and should not be delayed further.

Bryan A. Kettel, CFP®, ChFC, CLU

**Strategic Planning Partners, LLC**

*Insurance & Financial Services*

16150 NE 85<sup>th</sup> ST, Suite 220

Redmond, WA 98052

P. (425) 882-4349

F. (425) 881-6368

E. bryan@strategicpartnersllc.net

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1. The City has received your letter and appreciates your input.

7/7/2004

**Pam Fox**

**From:** Bob Brock  
**Sent:** Monday, July 12, 2004 8:10 AM  
**To:** Carolyn Sygitowicz; Pam Fox  
**Subject:** FW: SE Bypass

-----Original Message-----

**From:** Eeauthier@aol.com [mailto:Eeauthier@aol.com]  
**Sent:** Sunday, July 11, 2004 8:55 PM  
**To:** City Council  
**Cc:** Bob Brock  
**Subject:** SE Bypass

I would like to add my voice as support for the SE Bypass. I feel it is time to stop spending the tax payers money for endless studies and debate, and get on with the implementation and construction on the needed bypass. The well meaning citizens who are opposed to it are not helping to fix the increasing traffic problems.

Bottom line, get it moving NOW.

Edward E. Authier  
1115 NW Inneswood Drive  
Issaquah, WA 98027  
425-392-3227

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1. The City has received your letter and appreciates your input.

7/12/2004

Message

Page 1 of 1

**Pam Fox**

**From:** Bob Brock  
**Sent:** Monday, July 12, 2004 8:10 AM  
**To:** Carolyn Sygitowicz; Pam Fox  
**Subject:** FW: S.E. Bypass

-----Original Message-----

**From:** Lynn Rehn [mailto:l.rehn@comcast.net]  
**Sent:** Saturday, July 10, 2004 12:56 PM  
**To:** Bill Conley; Bill Conley; Kappler@uswest.net; David Kappler; Fred Butler; Hank Thomas; Joe Forkner; stephenjoe@aol.com; Russell Joe; Nancy Davidson; Bob Brock  
**Subject:** S.E. Bypass

*Dear Council members and Mr.Brock,*

*I am in favor of the improvement to down town  
Issaquah which is afforded by the S.E. bypass. I encourage and  
support your votes in favor of the Bypass.*

*Thank you,*

*Lynn Rehn*

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1. The City has received your letter and appreciates your input.

7/12/2004

**Pam Fox**

**From:** Walt Meade [WaltMea@msn.com]  
**Sent:** Wednesday, July 28, 2004 11:38 PM  
**To:** council@ci.issaquah.wa.us  
**Cc:** Pam Fox; waltmea  
**Subject:** DSEIS Comments

I'm writing in support of construction of the SE ByPass. I would have spoken at the July 15 meeting, but I was out of town at the time. Specifically, I recommend building the South A option. Curving the road away from the ultimate direction of traffic and intersecting at 2<sup>nd</sup> Ave leading to the high school seems to be a more congested option. Intersecting with a more direct route using 6<sup>th</sup> Ave seems more logical providing a better long term solution.

If we don't build it, they won't come. That seems to be the motto for most transportation solutions for the greater Seattle area. We have come anyway. We need traffic solutions! The following bullet points are my major reasons for building and I believe the City Council needs to strongly endorse building the bypass.

- Though the road will be at or near capacity by the time it is complete, not completing it means there is NO reasonable solution.
  - Widening SR 18 to I-90 can help some, but most people are not going to go seven additional miles out of there way and in the winter months, the extra elevation on 18 with more snow opportunities does not provide a safe driving solution.
  - Improving traffic signals and an alternative under I-90 are minor fixes that should also be done, but in no way will relieve enough traffic.
- Additional mass transit that would be a significant improvement is a pipe dream. There is no united vision in the Seattle metro area to do any effective mass transit. We (the greater we) are building a light rail that is over budget and only 2/3 the distance advertised. Then we decide to build a monorail (probably solely under funded) which is totally incompatible with light rail to create a single, effective region wide mass transit solution. There is major opposition to both mass transit solutions. Not building the SE Bypass will not force anyone to build effective mass transit.
- Improving 2<sup>nd</sup> Avenue to handle the traffic is a far worse solution than having the bypass go behind the school. A little noise during school on a bypass is far better than having a student hit by far greater traffic in front of the school on 2<sup>nd</sup> Avenue.
- Some homes and wetland are adversely affected. I wouldn't be happy if it was my home, but this is the solution that has the largest positive impact. It is a just a one mile stretch.
- If we want a vibrant city and downtown, we have to get the majority of the pass through traffic off the downtown streets leaving them for those wanting to do business.
- The opposition to the bypass is very well organized and focused. Most of us just want to be able to get around Issaquah without having to spend 20 minutes going a couple of miles. And most of us are not motivated to pay attention to what our local government is doing, let alone write to give an opinion.
- Surrounded by three mountains and cut in half by an interstate leaves us with very limited options. Blaming the traffic on non-residents and attempting to force them to

1. Alternatives to the proposed project that were considered and rejected are identified in Chapter 2 of this Final EIS. Modified Alternative 5 is the preferred alternative because it is the only build alternative that meets Purpose and Need and has impacts that can be effectively mitigated. The other build alternatives considered in the DSEIS would have greater impacts. No specific actions have been determined if the proposed SE Bypass roadway is not constructed. The No Action Alternative is not expected to result in travel pattern changes in Issaquah, based on projects planned in the City's current transportation improvement program plan. As summarized in Chapter 2, many alternatives to the Southeast Issaquah Bypass were evaluated in detail during project studies, but are not reasonable because they are not effective in reducing congestion. Should the Southeast Issaquah Bypass not be constructed, the City would have to return to the planning process to re-evaluate those alternatives that were rejected in the past.

2. Your comments have been noted and will be considered for the Final EIS. Impacts on schools and wetlands under Modified Alternative 5 are identified in Chapter 3 of this Final EIS.

3. and 4. Your comments have been noted and will be considered in the City's decision for this project.

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7/29/2004

take longer alternatives goes against human nature. They won't do it. We need to fix what we control and that means building the SE Bypass.

4

We have become a nation of naysayers. Don't build in my back yard. Don't tax me unless I'm getting an immediate, direct benefit. Don't build because it causes environmental damage. We live in a major metropolitan area. We need to mitigate the growth and preserve forested and environmental areas when possible. It is not always possible. We cannot stop the growth and Issaquah will never again be the quaint little city it was just a few short years ago. We can make decisions that help preserve some of that small town feel. One such decision is to build the bypass and get the non-user traffic out of the heart of the town. I imagine the organized opposition will provide significantly more recommendations to not build the bypass than the City Council will see in favor of the bypass. The Council needs to vote for the greater good of Issaquah which is to build the bypass! There are no reasonable alternatives.

Walt Meade  
985 NW Firwood Blvd.  
Issaquah, WA 98027  
425-313-3140

7/29/2004



**Pam Fox**

**From:** Carolyn Sygitowicz  
**Sent:** Friday, July 09, 2004 2:06 PM  
**To:** Pam Fox  
**Subject:** FW: SE Issaquah Bypass

-----Original Message-----

**From:** Moos, Jerry H. [mailto:jerry.moos@wamu.net]  
**Sent:** Friday, July 09, 2004 1:03 PM  
**To:** Bob Brock; MAYOR; Bill Conley; Kappler@uswest.net; David Kappler; Fred Butler; Hank Thomas; Joe Forkner; stephenjoe@aol.com; Russell Joe; Nancy Davidson  
**Subject:** SE Issaquah Bypass

July 9, 2004

Dear City Council Member:

I am writing to express my support of the SE Issaquah Bypass. As manager of an Issaquah business, I believe it is vital to the economic health of the community that steps are taken to both relieve and improve the traffic flow in and around Issaquah. I fear that failure to move forward on the Bypass initiative will result in a stagnate economy requiring a long term recovery plan.

If Issaquah chooses to be a destination, the city planners need to make this community a desirable environment as well as maintaining the functionality of the city. I believe the Bypass will help make this happen.

I encourage the city Council to move forward with plans to build the Bypass. Thank for your consideration.

Very truly yours,

**Jerry H. Moos**  
Vice President/Manager  
1195 NW Gilman Blvd.  
Issaquah, WA 98027  
425-392-5990 Telephone  
425-392-2195 Fax

Attention: Any views expressed in this message are those of the individual sender, except where the message states otherwise and the sender is authorized to state them to be the views of any such entity. The information contained in this message and or attachments is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. If you received this in error, please contact the sender and delete the material from any system and destroy any copies.

7/9/2004

1. Your comments have been noted and will be considered for the Final EIS.

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**Pam Fox**

**From:** Carolyn Sygitowicz  
**Sent:** Thursday, July 08, 2004 1:13 PM  
**To:** Pam Fox  
**Subject:** FW: SE Bypass support

-----Original Message-----

**From:** Bobbie Eatmon [mailto:Bobbie.Eatmon@vmmc.org]  
**Sent:** Thursday, July 08, 2004 12:33 PM  
**To:** stephenjoe@aol.com; Bill Conley; Bob Brock; David Kappler; Fred Butler; Hank Thomas; Joe Forkner; MAYOR; Nancy Davidson; Russell Joe; Kappler@uswest.net  
**Subject:** SE Bypass support

July 7, 2004

Issaquah Mayor and City Council  
PO Box 1307  
Issaquah, WA 98027

Dear Honorable Mayor and City Council:

I am writing to let you know my support for the SE Bypass. If you consider the estimates for the increase in population for this area and the impact of traffic from that growth, if we do not do something soon, our roads will become even more congested.

The Bypass will allow relief from traffic on not only Front Street, but all of our roads for the next twenty years or more, improving the situation for businesses and residents alike.

Please vote for construction of the Bypass.

Sincerely yours,

Bobbie Eatmon  
Virginia Mason Issaquah

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1. Your comments have been noted and will be considered for the Final EIS.

7/8/2004

**Pam Fox**

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**From:** Bob Brock  
**Sent:** Thursday, July 08, 2004 11:27 AM  
**To:** Pam Fox  
**Subject:** FW: SE Bypass

-----Original Message-----

From: Kelly Richardson (mailto:Kelly@rowleyproperties.com)  
Sent: Thursday, July 08, 2004 11:21 AM  
To: Bob Brock; MAYOR; Bill Conley; Kappler@uswest.net; David Kappler; Fred Butler; Hank Thomas; Joe Forkner; stephenjoe@aol.com; Russell Joe; Nancy Davidson  
Subject: SE Bypass

July 8, 2004

Issaquah Mayor and City Council  
PO Box 1307  
Issaquah, WA 98027

Dear Honorable Mayor and City Council:

I am writing to let you know my support for the SE Bypass. If you consider the estimates for the increase in population for this area and the impact of traffic from that growth, if we do not do something soon, our roads will become even more congested.

The Bypass will allow relief from traffic on not only Front Street, but all of our roads for the next twenty years or more, improving the situation for businesses and residents alike. The no action alternative is unacceptable. Currently, the congested traffic generates noise, air and water pollution. Just imagine if nothing is done and how that will impact the environment!

I grew up and currently live in Issaquah. Downtown Issaquah has charm and we need to preserve it. Issaquah will stagnate if the Bypass is built.

Please vote for construction of the Bypass.

Sincerely yours,

Kelly Richardson  
1595 NW Gilman Suite 1  
Issaquah, WA 98027  
(425) 391-4497 ext. 217  
(425) 391-4009 (fax)

1

1. Your comments have been noted and will be considered for the Final EIS.

**Pam Fox**

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**From:** Bob Brock  
**Sent:** Thursday, July 08, 2004 11:39 AM  
**To:** Carolyn Sygltowicz; Pam Fox  
**Subject:** FW: Issaquah SE Bypass

Carolyn: Let me know if you want me to do the forwarding to Council and Ava.

-----Original Message-----  
From: DKRich808@aol.com [mailto:DKRich808@aol.com]  
Sent: Thursday, July 08, 2004 11:31 AM  
To: Bob Brock  
Subject: Issaquah SE Bypass

July 8, 2004

To City Council Member:

I am writing to support the SE Bypass. As you know most of the traffic on Front Street is just passing through Issaquah. Also, I imagine a lot of the traffic is using exit 15 and Newport Way to the Hobart Road.

The Bypass will give us back our town. We will be able to shop along Front Street and that area can be a place where people can enjoy their small town. Without the Bypass I am afraid Issaquah will become a place for cars to get to I-90 and the town will gradually decay due to the fact no one will want to improve property where traffic is so bad.

Please give your support for approval of the Bypass project.

Sincerely,

Dan Richardson  
14910 262nd Ave SE  
Issaquah, WA 98027

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1. Your comments have been noted and will be considered for the Final EIS.

**VALERIE J. SOUTHERN**

June 30, 2004

RECEIVED  
JUL 02 2004  
PUBLIC WORKS ENG.

Mr. Robert Brock, P.E.  
Public Works Director  
City of Issaquah  
PO Box 1307  
Issaquah, Washington 98027

Dear Mr. Brock:

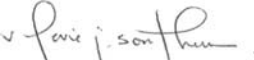
I am writing in support of the SE Bypass in Issaquah. The City must choose an alternative but the "no build" alternative is unacceptable.

Without the Bypass, the old downtown district will stagnate because no economic redevelopment of the area will occur due to the air pollution, storm water pollution, noise and gridlocked traffic.

Without the Bypass, the traffic mitigation for Talus will have to be accounted for in other ways and that could create even worse choices for roadway improvements along Newport Way, Front Street and Sunset Way.

Thank you for passing on these thoughts to the City Council.

Sincerely yours,

  
Valerie J. Southern

3849 KLAHANIE DRIVE, SE  
#8-201  
ISSAQUAH, WASHINGTON 98029

1

1. Your comments have been noted and will be considered for the Final EIS.

**Pam Fox**

**From:** Carolyn Sygitowicz  
**Sent:** Wednesday, July 07, 2004 10:30 AM  
**To:** Pam Fox  
**Subject:** FW: SE Bypass Project

-----Original Message-----

**From:** valerie.southern [mailto:valerie.southern@prodigy.net]  
**Sent:** Wednesday, June 30, 2004 5:58 PM  
**To:** Nancy Davidson; Joe Forkner; Russell Joe; Hank Thomas; Fred Butler; David Kappler; Bill Conley; MAYOR  
**Subject:** SE Bypass Project

Honorable Mayor Frisinger, Council President Davidson and Councilors Butler, Kappler, Conley, Forkner, Joe and Thomas:

I am writing to request your support of the SE Bypass Project. The City must choose an alternative but the "no build" alternative is unacceptable. Without the Bypass, the old downtown district will stagnate. Its growth and economic redevelopment will falter due to the air, storm water and noise pollution caused primarily by the debilitating effects of regional traffic. I have reviewed the June 2004 DSEIS and find the traffic analysis most compelling. It provides the following facts, that I hope you will please consider:

- By 2030 **without** the SE Bypass - pass-through (regional, non-local) traffic on Front Street will **increase** by 41% - northbound and 55% - southbound.

- By 2030 **with** the SE Bypass - pass-through volumes on Front Street will **decrease** by 35% - northbound and 40% - southbound.

- By 2030 **with** the SE Bypass - pass-through volumes at Second Avenue and Issaquah-Hobart Road will **decrease** 15% - northbound and 45% - southbound.

I am also aware that by 2030, traffic levels-of-service are projected to be *E* and *F* on Front Street with the SE Bypass in-place. It should be noted - the cause of these low service levels will be internally-generated traffic along Gilman and other local roadways - not pass-through regional traffic. As stated above, pass-through traffic will decrease substantially. Given the choice of locally-generated traffic which will support our City's economic development and growth and pass-through traffic, which has no specific interest in our City, I would prefer the SE Bypass and the locally-generated traffic. The latter will require additional traffic management, which I am confident you will oversee and address in the City's annual transportation improvement program.

I have also reviewed the City's adopted and aggressive growth plans within its Comprehensive Land Use Plan. These include a) the cumulative effect of commercial, retail and light industrial zoning along Gilman from Front Street to Tibbets Creek, b) the Issaquah Highlands urban village and c) the Talus urban village. All three are adopted, vested for full development and hence are irrevocable. With this, the most critical obligation of the City under GMA is to see that its transportation infrastructure is developed and reasonably concurrent with traffic generation. Present traffic counts throughout the City suggest that other corridor improvements (such as the Spar Road) are performing as intended but the absence of the SE Bypass is being felt acutely within the Front Street corridor - where congestion is worsening.

Lastly, there is a concern - expressed by some members on the Council - that the City can not afford to build the project. In my review of this concern, I have learned that there are federal, state, regional and county funding sources for which the SE Bypass is eligible. The project, for example, is listed on the Regional Transportation Improvement District (RTID) list of projects. King County has also officially stated its support for funding a portion of project cost. I believe the funding concern may be reasonably addressed without alarming

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1. Your comments have been noted and will be considered for the Final EIS.

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2. As noted in Chapter 1 of this Final EIS, the proposed project is intended to relieve congestion affecting the Front Street corridor.

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3. Your comments have been noted and will be considered for the Final EIS.

7/7/2004

our citizens into believing that only they will bear all or the lion's share of project costs.

I appreciate your consideration of these thoughts. Moreover, I ask for your approval of one of the build alternatives outlined in the DSEIS. If you have questions or wish to discuss this, please do not hesitate to contact me. Thank you.

Sincerely, Valerie J. Southern  
3849 Klahanie Drive, SE - #8-201  
Issaquah, Washington 98029.  
Tel: 425-557-2239  
Fax: 425-557-2353  
E-Mail: valerie.southern@prodigy.net

7/7/2004

**Pam Fox**

---

**From:** Carolyn Sygitowicz  
**Sent:** Tuesday, June 29, 2004 3:19 PM  
**To:** Bob Brock (Bob Brock); Pam Fox  
**Cc:** Cathleen Koch; Ava Frisinger; Leon Kos  
**Subject:** FW: SE Bypass information



SE BYPASS-DEIS notes to city c...



SE BYPASS TRAFF NUMBERS.xls (1...

-----Original Message-----

**From:** Richard Symms [mailto:Richard@rowleyproperties.com]  
**Sent:** Tuesday, June 29, 2004 12:09 PM  
**To:** Bill Conley; David Kappler; Fred Butler; Hank Thomas; Joe Forkner; MAYOR; Nancy Davidson; Russell Joe  
**Subject:** SE Bypass information

Please take the time to read these two enclosures.

<<SE BYPASS-DEIS notes to city council comments text.doc>>  
NUMBERS.xls>>

<<SE BYPASS TRAFF

Richard S. Symms  
richard@rowleyent.com  
(425) 391-4497 ext. 202 direct call  
(425) 241-6251 cell phone  
(425) 391-4009 fax  
(425) 395-9586 fax at computer  
1595 NW Gilman Blvd. Suite 1  
Issaquah, WA 98027



**ISSAQUAH SE BYPASS  
DEIS REVIEW COMMENTS  
TRAFFIC STUDY**

**1. INTRODUCTION:**

- The DEIS published for the Issaquah SE Bypass is a very thorough and comprehensive document. It should be amended with comment as requested and adopted as a Final EIS as quickly as possible. One typographical error was found on Figure 18 of the Transportation Appendix which should be corrected in the final. The error is in the drafting of "figure 18" for traffic numbers at the intersection of Front Street and Gilman, south bound. The pass through traffic and one or more of the turning movements southbound is incorrect. It is assumed (and confirmed with discussions with the City) the model was correct but the figure was transposed in drafting.

**2. HISTORICAL PURPOSE AND NEED:**

- The historical purpose and need has been to reduce congestion within the Front Street Corridor and give pass through traffic an opportunity to access I-90 more efficiently.
- Issaquah Se Bypass was foreseen by City officials two decades or more ago. Those officials and their successors eventually perceived the link between providing the capacity of a Bypass and the fulfillment of desired city growth plans adopted pursuant to the Growth Management Act and subsequent comprehensive plan.
- Without the capacity of the Bypass the City will forever fail to be concurrent with GMA and its citizens will be doomed to experience congestion even worse than we know it now within the Front Street corridor.

**3. PRESENT PURPOSE AND NEED:**

- The present purpose and need is still to reduce congestion within the Front Street Corridor and give pass through traffic an opportunity to access I-90 more efficiently. However there is a new and in some ways more important context of the purpose and need. That new context is the obligation inherent with the GMA and adopted City Comprehensive Land Use Plan. The City now has a legal obligation to provide the North-South capacity through town envisioned in the original comprehensive plan, transportation element. Not only is this obligation a legal one but it's also a moral obligation to all the citizens who drive the N-S corridor and put up with its excessive congestion.
- The City has adopted aggressive growth plans with its comprehensive land use plan. Those plans can be characterized in three modes or sub-areas with self-evident conclusion:
  - a. The cumulative effect of commercial/retail/light industrial along Gilman from Front to Tibbets Creek.
  - b. Issaquah Highlands.
  - c. Talus
- Most other City transportation needs pale in light of the cumulative impact of those three land uses.
- All three are adopted, vested for full development and are hence irrevocable.
- The most critical obligation of the City under GMA is to see that transportation infrastructure is constructed reasonably concurrent with traffic generation. Present traffic counts throughout the City suggest that other improvements are doing what they were intended for but the absence of the Bypass is being felt within the Front Street Corridor. Within that corridor congestion is worsening.

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1. Comments noted volumes discrepancies shown in Figure 18 will be corrected.

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2. It has been acknowledged that the proposed project would be consistent with the City's Comprehensive Plan and would assist Issaquah in meeting growth management goals. Chapter 1 of this Final EIS provides additional discussion of the proposed project's purpose and need.

#### 4. TRAFFIC STUDY:

- The DEIS traffic study is immense evaluating literally every element of possible environmental impact of the various alternatives. The data it contains is almost overwhelming to lay persons not familiar with such studies.
- If one cuts to the chase and only looks at the important locations of impact it is easier to compare with and without analysis. The intersections of Front and Gilman and Second and Issaquah-Hobart are very good locations with which to evaluate the effect of the SE Bypass in reducing pass through traffic within the Front Street corridor. The attached spread sheet makes that comparison for the model years of 2000, 2005 no build, 2005 build, 2030 no build and 2030 build.

The conclusion of the comparison of those two intersections for the years indicated is as follows:

1. Traffic volumes on Front Street are continuing to increase and will continue through the design year of 2030.
  2. Without the SE Bypass Front Street traffic will increase at Front and Gilman as follows:  
2000 am peak = 775                      2000 pm peak=430  
2030 am peak=1095                      2030 pm peak=670  
This represents a 41% increase in pass through traffic northbound and 55% southbound.
  3. With the SE Bypass constructed, volumes will decrease on Front and Gilman as follows:  
2000 am peak = 775                      2000 pm peak=430  
2030 am peak=510                      2030 pm peak=265  
This represents a 35% increase in pass through traffic northbound and 40% southbound
  4. With the Se Bypass constructed, volumes will decrease on Second and Issaquah-Hobart as follows:  
2000 am peak = 1060                      2000 pm peak=1015  
2030 am peak=896                      2030 pm peak=560  
This represents a 15% increase in pass through traffic northbound and 45% southbound
- One of the most significant miss-understandings about the SE Bypass traffic study suggests that even if the Bypass is constructed the traffic conditions will worsen within the Front Street Corridor. That understanding is by itself accurate but only in the context of LOS analysis which includes the trips for all legs and all movements of traffic.  
A correct understanding of the traffic trip numbers at Front and Gilman is as follows:
    - *The SE Bypass will reduce from year 2000 N-S pass through trips peak hour by 35% northbound and 40% southbound even in year 2030.*
    - *The LOS will go from C (E) to E (F) from 2000 to 2030 but the cause will be the internally generated trips along Gilman and not the pass through traffic which decreases substantially.*
    - *The change in ratio of pass through traffic from year 2000 to 2030 is from 32% to 22%. The meaning of which is that pass through traffic drops 35%.*
    - *The traffic not pass through is all exclusively the cause of internal trips within the City not related to the Bypass.*
  - The SE Bypass is not the reason LOS conditions worsen. The reason is the increase in trips turning to and from Gilman and not related to the Bypass.

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3. Please refer to Chapter 2 of the Final EIS and SDEIS Appendix G, Transportation Technical Report, for a discussion of the impacts of potential widening of SR 18 (pg. 65).

**5. SR 18**

- It has been suggested that SR18, if improved, would effectively reduce the need for the SE Bypass.
- That is refuted by the Traffic study number.
- Logic suggests that the present SR18, having virtually 3 lanes from Hobart Road to I-90 has capacity today available and would be used if the users of the N-S corridor through the City wanted to do so. It is available and, if it would suffice, they would use it.
- The only conclusion, and this is borne out by the traffic model, is that it is far too circuitous and not attractive to the corridor drivers or they would use it today.

**6. ENVIRONMENTAL IMPACT:**

- The SE Bypass has impact to be sure. However, none is so great that it cannot be mitigated.
- Noise: The studies conclude abatement or mitigation is not mandated as the impact is less than federal guidelines.
- Air: Air quality will improve by virtue of the large numbers of pass through traffic that will move efficiently through the Bypass rather than sit in congestion in fifteen to twenty minutes idling their way through town.
- Water: Water quality will improve due to the amount of road surface and traffic pollutant discharge that will be collected and treated rather than ran off into the streams.

**7. CONCLUSION:**

- The SE Bypass is needed more than ever.
- While it has environmental impacts we can mitigate them as effectively as any of the other project done around the City.
- We have allowed the massive land use developments that generate traffic we must now provide the transportation infrastructure to support our land use.
- Expensive though it is, it will only cost our children more in the future to build than today.
- Leave a positive legacy for our children not a mess, build the Bypass.

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4. Modified Alternative 5 is intended to meet the purpose and need for the project while minimizing identified impacts on both natural and social elements. Impacts on noise, air and water quality are addressed in Chapter 3 of this Final EIS.



**Pam Fox**

**From:** Bob Brock  
**Sent:** Tuesday, July 13, 2004 8:05 AM  
**To:** Carolyn Sygitowicz; Pam Fox  
**Subject:** FW: I support the Bypass

-----Original Message-----

**From:** dkm [mailto:drewandkari@comcast.net]  
**Sent:** Tuesday, July 13, 2004 6:44 AM  
**To:** Bob Brock; MAYOR; Bill Conley; Kappler@uswest.net; David Kappler; Fred Butler; Hank Thomas; Joe Forkner; stephenjoe@aol.com; Russell Joe; Nancy Davidson  
**Subject:** I support the Bypass

The SE Bypass is an environmental solution to an ecological problem that is steadily growing larger.

Runoff from Front Street is currently untreated! Just think of the traffic volume that passes through Front Street today and you intuitively know that this can't be good for our aquifer. Then there is the air pollution. During peak hours, cars can spend 25 minutes or more driving and idling through the one mile stretch of road that passes through our city. When I am sitting there in the traffic, I activate the recirculated air feature of my car's HVAC so I don't have to breathe that stuff.

I understand that 100% of the runoff for the bypass will be thoroughly treated before being released into our aquifer. The bypass will remove many cars from a corridor with untreated runoff and put them on a corridor with treated runoff. This is an obvious win! Then you add the reduction in trip time to cover the same distance using the bypass and you multiply our win.

Some people say that the bypass will be a travesty for wetlands. The fact is that only 0.16 acres are affected by the preferred build alternative. Not only will these wetlands be replaced; they will be doubled and improved. I've heard a few activists say you can never replace a wetland effectively but that just isn't true. We've done it here in our own community quite successfully and actually improved conditions. Tibbetts Creek is a great example.

The EIS seems sufficient and complete. Do not be deterred by environmental concerns that are actually being thoroughly addressed. Please vote for the Bypass!

Sincerely yours,

Drew Magill

7/13/2004

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1. Your comments have been noted and will be considered for the Final EIS.

2

2. Modified Alternative 5 was selected, in part, because of design changes that would reduce potential wetland impacts. A revised wetland mitigation plan has been prepared for Modified Alternative 5 and is included with this Final EIS.

Jane Garrison  
Landscape Architect  
195 Front St. N.  
Issaquah, WA 98027  
(425)392-2394 Fax: (425)313-4650  
[jgarrison@quest.net](mailto:jgarrison@quest.net)

Date: July 13, 2004

Memo to: Mayor Ava Frisinger & Council Members  
City of Issaquah  
PO Box 1307  
Issaquah, WA 98027

Re: Southeast Bypass

From: Jane Garrison

Pages: 1

Every project has its price. Certainly this one is no exception. As I reviewed the EIS, walked the proposed alignment, talked to civil engineers, City staff, and government representatives, I found myself torn. It's not cut and dried. It's a difficult decision.

I saw the terrain in the north end, imagined the cut across Tiger Mountain, the difficult retaining walls, thought about the impacts on aquifer recharge, the fill in the lowlands, the ever-creeping edges of development that eat away at the green space around us.

Then I walked through Olde Town and saw the tiny miner's houses, scaled so small it's hard to imagine how people lived in them. The small-scale streets and sidewalks remind me of how quiet and slowed down life was before cars. Our old main street with its strong images gives Issaquah its heart and soul.

This image that we've managed to maintain through explosive development around us is as precious as the environment. Both are necessary for survival, mentally and physically. Sammamish, Lynnwood, Redmond, and all suburban cities would do anything to have visible historical roots like Issaquah's. Klahanie chose Issaquah over Sammamish for this reason.

It's easier to recognize the loss of the natural as opposed to the built environment. We can measure run-off quantities, pollutant levels, and area calculations of shrub/scrub, forests, and steep slopes. Much more subtle is the loss of our history and its image when streets are widened and old neighborhoods torn down.

Our town and our environment both must be saved. Don't spend more money and time on the EIS. Accept it, and move on. We need the best for our town. Let's accept the EIS and build the bypass, using money for more and better design options for engineering.

Aldo Leopold said "Conservation is a state of harmony between man and land." Let's be conservationists. Protect our town, protect our environment, and build this road.

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1. Your comments have been noted and will be considered for the Final EIS. Potential project impacts and mitigation measures for social elements, historic and archeological elements and visual quality are addressed in Chapter 3 of this Final EIS.

**Pam Fox**

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**From:** Carolyn Sygitowicz  
**Sent:** Thursday, July 15, 2004 10:33 AM  
**To:** Pam Fox  
**Subject:** FW: SE Issaquah Bypass

-----Original Message-----  
From: jbloghome [mailto:jbloghome@comcast.net]  
Sent: Thursday, July 15, 2004 8:49 AM  
To: City Council  
Subject: SE Issaquah Bypass

Good morning.

The purpose of this Email is to let you know that we STRONGLY SUPPORT moving forward on the construction of the SE Issaquah Bypass. This past September we purchased a home on Tiger Mountain. On a daily basis, we travel down Front St. to reach I-90. As you know, the traffic is always grid locked. In the afternoon, the four mile journey can take nearly 25 minutes. We have always noticed the posted "No Southeast Bypass" yard signs along Front Street. We never knew what it meant. This past weekend we did some research on the internet. We found and read several articles about the plans for the new roadway. It boggles our mind how anyone (especially the 20,000 that use Front Street each day) can oppose such a plan. We would appreciate your support of the plan, and we hope that you will continue to place it on your list of top priorities. Thank you for listening.  
Regards, Brian Alfertig and John Brigham 13350-244th Lane SE Issaquah, WA 98027

1

1. The City has received your letter and appreciates your input.



State Farm Insurance & Financial Services  
Tom Sessions, Agent  
6415 East Lake Sammamish Parkway S.E.  
Issaquah, Washington 98029

RECEIVED

JUL 15 2004

PUBLIC WORKS ENG

RECEIVED ON

JUL 14 2004

CITY OF ISSAQUAH  
OFFICE OF THE MAYOR

Pam Foy

July 12, 2004

Issaquah Mayor and City Council  
PO Box 1307  
Issaquah, WA 98027

Dear Honorable Mayor and City Council:

I am writing to let you know my support for the SE Bypass. If you consider the estimates for the increase in population for this area and the impact of traffic from that growth, if we do not do something soon, our roads will become even more congested.

The Bypass will allow relief from traffic on not only Front Street, but all of our roads for the next twenty years or more, improving the situation for businesses and residents alike.

Please vote for construction of the Bypass.

Sincerely yours,

Tom Sessions

1

1. The City has received your letter and appreciates your input.



**Pam Fox**

**From:** Bob Brock  
**Sent:** Monday, July 19, 2004 9:25 AM  
**To:** Pam Fox  
**Subject:** FW: SE Bypass

-----Original Message-----

**From:** Bob Snyder [mailto:Bob@rowleyproperties.com]  
**Sent:** Friday, July 16, 2004 2:25 PM  
**To:** Bob Brock; MAYOR; Bill Conley; Kappler@uswest.net; David Kappler; Fred Butler; Hank Thomas; Joe Forkner; stephenjoe@aol.com; Russell Joe; Nancy Davidson  
**Subject:** SE Bypass

Dear Honorable Mayor and City Council:

I am writing to voice my support for the SE Bypass. Considering the projected growth of our community and the impact that this growth will have on traffic, we must do something soon. Our roads are already congested; inaction will only exacerbate this.

The addition of a new north/south alternative will reduce the amount of traffic not only on Front Street, but all of our roads for the next twenty years or more, this will improve the situation for businesses and residents alike.

Deciding to ignore our traffic problems and eliminate this project will saddle future generations with this responsibility. The time to act is now.

Please vote for construction of the Bypass.

Sincerely yours,

**Bob Snyder**  
 Facilities Manager  
 Rowley Properties  
 425 391-4497 ext. 208

- |   |  |
|---|--|
| 1 | 1. The City has received your letter and appreciates your input. |
|---|--|

7/20/2004



# **EASTSIDE CONSULTANTS, INC.**

www.eastsideconsultants.com

ENGINEERS-  
SURVEYORS

RECEIVED  
JUL 19 2004  
PUBLIC WORKS ENG.

July 16, 2004

City of Issaquah  
Public Works/Engineering  
1775 12<sup>th</sup> Avenue N.W.  
P.O. Box 1307  
Issaquah, Washington 98027-1307

Attention: Pam Fox  
Project Coordinator

Dear Ms. Fox:


This letter is written with regard to the proposed "Southeast Bypass" project.

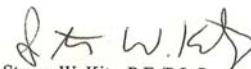
As local business owners and commuters that use the Issaquah-Hobart Road every working day of the year, we can attest to the ever increasing time required to travel to and from work. A number of our employees also use this route and are also aware of the need for an improved route to the southeast. Due to the nature of our work and various arrival times, car pooling is not an option. The buses available also do not meet our schedules.

We would like to express our support for the proposed bypass. Thank you for your efforts and attention to this letter.

Very truly yours,

EASTSIDE CONSULTANTS, INC.

  
Robert J. Bogdon, P.L.S.  
Vice President

  
Steven W. Kitz, P.E./P.L.S.  
Secretary/Treasurer

RJB/SWK:ch

415 RAINIER BOULEVARD N., ISSAQUAH, WASHINGTON 98027 PHONE: (425) 392-5351 FAX: (425) 392-4676  
214 PENNSYLVANIA AVENUE, CLE ELUM, WASHINGTON 98922 PHONE: (509) 674-7433 FAX: (509) 674-7419

1

1. The City has received your letter and appreciates your input.

*Karen Lund  
3060 NE Logan St.  
Issaquah, WA 98029*

July 12, 2004

Issaquah Mayor and City Council  
PO Box 1307  
Issaquah, WA 98027

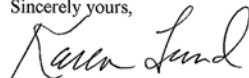
Dear Honorable Mayor and City Council:

I am writing to let you know my support for the SE Bypass. If you consider the estimates for the increase in population for this area and the impact of traffic from that growth, our roads will become parking lots.

The Bypass will allow relief from the horrible traffic on not only Front Street, but all of our roads for the next twenty years or more.

Please vote for construction of the Bypass.

Sincerely yours,



Karen Lund

cc: Robert Brock  
Public Works Director

1

1. Your comments have been noted and will be considered for the Final EIS.

Faris Taylor  
1506 NE Jade Street  
Issaquah, WA 98029

July 11, 2004

Issaquah Mayor Ava Frisinger and City Council  
PO Box 1307  
Issaquah, WA 98027

Dear Mayor Frisinger and Members of the City Council:

You will soon make a decision, that will affect the future of all of us who live in this area, and I would like you to know that many of us are very much in favor of the proposed By-Pass.

We need to do something about rapidly increasing traffic and at the same time, protect and improve the economy of our down-town as well as the quality of life of the residents and businesses who live there. In researching the pros & cons of this project, we have discovered that the current peak traffic loads at Front Street and Gilman Blvd, are projected to increase to 1,095 mornings and 670 evenings by the year 2030. A mind boggling 41%-55% increase, with most of these cars passing as fast as they can right on through our village main street with no thought or opportunity to patronize the many small businesses who line Front Street and are the mainstay of our Issaquah economy.

To reroute that commuting traffic down Second Avenue directly in front of residential homes, Issaquah High School, Middle School and Clark School would simply move the problem over several blocks, and the result would be much worse.

I have not read all of the SEIS but that with the intense scrutiny it has been given for the past eight years or so, we feel that it is a document we can accept in our efforts to resolve an intractable growth issue without degrading the environment.

All of those entities that will benefit, Issaquah, King County and the State of Washington, should pay the cost of building the By-Pass, along with Federal funds, if available. While the actual construction would be several years away, this favorable decision should be made now.

Thank you, from all of us, for your years of careful study on this issue

Best Regards,

Faris Taylor

cc: Mr. Robert Brock  
Public Works Director

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2

1. and 2. Your comments have been noted and will be considered for the Final EIS.

## Issaquah Dental Arts

710 N.W. Juniper Street, Suite 206, Issaquah, WA 98027  
Phone: 425-837-0634 Fax: 425-837-0636

July 7, 2004

Issaquah Mayor and City Council  
PO Box 1307  
Issaquah, WA 98027

Dear Honorable Mayor and City Council:

I am very concerned about the effect some people are having in their opposition to the SE Bypass. The SE Bypass must be built because it is part of the regional solution to traffic mobility. Without the Bypass, Issaquah will remain the only route people will choose to get to I-90 from those towns south of us. That will be a disaster for Issaquah.

Do your part to complete the plan. The connection to the new interchange, the traffic mitigation for Talus and Highlands, and the routing of traffic from the region, were all promised as the part of the solution for growth you and King County allowed.

Take a stand. Show the majority of us who favor the Bypass that you are willing to face the traffic problems with a sensible solution.

Yours truly,



Dr. Peter Huysing

cc: Mr. Robert Brock  
Public Works Director

1

1. Your comments have been noted and will be considered for the Final EIS.

9324 NE 128<sup>th</sup> Lane  
Kirkland, WA 98034

CITY CLERK'S OFFICE

JUL 20 2004  
RECEIVED

Mayor Ava Frisinger  
City of Issaquah  
130 E. Sunset Way  
Issaquah, WA 98027

July 16, 2004

RE: The Bypass and other fun

Dear Mayor Frisinger and Councilmembers:

Issaquah's traffic situation reminds me of what baseball great Yogi Berra said about a popular New York City restaurant: "Nobody goes there anymore....it's too crowded."

I waited longer in traffic on Gilman Boulevard inching back to I-90 after my mid-day doctor's appointment than it took to see the doctor in the first place. Issaquah is running the risk of becoming "a nice place to live, but you wouldn't want to visit there."

Local governments, such as Issaquah, can do many good things with the money entrusted to them. Providing for the infrastructure and mobility of the community is one of those municipal responsibilities. In fact, you have a monopoly in this department. The private sector cannot go out and build a new thoroughfare on it's own to meet increased demand.

Issaquah is a crossroads for several growing communities that surround the city. The "head-in-the-sand-make-things-so-bad-that-people-with-leave" strategy just doesn't work. In addition to the Bypass, improved access across/under I-90 is an obvious need.

Communities grow and change. This is normal and natural. It happens to our pets, our children and us. Please spend the resources needed to keep up with the growing travel demands of the community.

Best Regards,



James F. Kovarik

Cc: The Issaquah City Council and City Administrator Leon Kos

PS: Another Yogi Berra-ism: "Never answer an anonymous letter..." so I signed this one.

1

1. The City has received your letter and appreciates your input.

Mark P. Jaeger  
9105 Issaquah Property, LLC  
12556 Lake City N E  
Seattle, WA 98125

CITY CLERK'S OFFICE  
JUL 20 2004  
RECEIVED

July 18, 2004

Issaquah City Council  
City of Issaquah  
PO Box 1307  
Issaquah, WA 98027

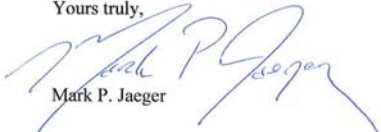
Dear Council Members:

I am an owner of commercial property in Issaquah and I am very concerned about the effect some people are having in their opposition to the SE Bypass. The SE Bypass must be built because it is part of the regional solution to traffic mobility. Without the Bypass, Issaquah will remain the only route people will choose to get to I-90 from those towns south of us. That will be a disaster for Issaquah.

Do your part to complete the plan. The connection to the new interchange, the traffic mitigation for Talus and Highlands, and the routing of traffic from the region, were all promised as the part of the solution for growth you and King County allowed.

Take a stand. Show the majority of us who favor the Bypass that you are willing to face the traffic problems with a sensible solution.

Yours truly,

  
Mark P. Jaeger

1

1. The project was recognized as an element of the Regional Transportation Plan in 2000.



**EASTSIDE CONSULTANTS, INC.**

[www.eastsideconsultants.com](http://www.eastsideconsultants.com)

ENGINEERS-  
SURVEYORS

RECEIVED  
JUL 26 2004  
PUBLIC WORKS ENG.

July 23, 2004

Pam Fox  
City of Issaquah  
Public Works/Engineering  
P.O. Box 1307  
Issaquah, WA 98027-1307

RE: Southeast Bypass Project

Dear Ms. Fox:

This letter is written in regard to the proposed Southeast Bypass Project and my support of the project. I am a licensed Civil Engineer employed by Eastside Consultants, a local business, and commute daily from Maple Valley on the Issaquah Hobart Road. It is not uncommon for my one way commute time to be an additional 20 minutes due solely to traffic on the Issaquah Hobart Road just south of the city. Due to my profession, I am aware and familiar with traffic issues in and around the city. It is my personal and professional opinion this traffic problem is excessive and needs to be resolved.

Sincerely,

Chad Allen, P.E.

415 RAINIER BOULEVARD N., ISSAQUAH, WASHINGTON 98027 PHONE: (425) 392-5351 FAX: (425) 392-4676  
214 PENNSYLVANIA AVENUE, CLE ELUM, WASHINGTON 98922 PHONE: (509) 674-7433 FAX: (509) 674-7419



**Pam Fox**

**From:** Doretta Levy  
**Sent:** Wednesday, July 14, 2004 9:16 AM  
**To:** 'Ellen Vaughn'; Pam Fox  
**Cc:** Bob Brock; Mark Hinthorne; Nancy Bushore  
**Subject:** RE: For the Bypass Public Hearing July14th

Ellen,

Dear Ms. Vaughn:

Thank you for your letter of July 13 on the By-Pass. Your letter is being forwarded to Pam Fox, the project manager for that project, who is collecting comments that will be put into the EIS. Your letter is also being forwarded to Bob Brock, Public Works Director.

Doretta Levy  
Planning Dept.

-----Original Message-----

From: Ellen Vaughn [mailto:ellen.vaughn@worldnet.att.net]  
Sent: Tuesday, July 13, 2004 5:19 PM  
To: WebMail-Planning  
Subject: For the Bypass Public Hearing July14th

For the Bypass Public Hearing July 14

I urge the Council to proceed with the By-Pass based upon the following:

The environmental impact studies do not indicate any environmental concern that overrides the downtown sub area air pollution and noise pollution concerns that were an integral part of the initial by-pass plan. The air quality in the downtown area is in danger of not meeting the requirements of the Washington State Air Quality Program or the Federal Act. The costs of being out of compliance are potentially disastrous.

The by pass has been a factor in the approval of nearly all development in the City of Issaquah since the passage of its GMA mandated comprehensive plan. It is questionable that many of these projects would have been able to meet transportation concurrency requirements without the by-pass. The City is likely to incur some liability for failing to complete the project.

The term by pass is an unfortunate one. This project is simply a sorely needed North/South road that will allow traffic to avoid the mixed-use downtown core.

In the comprehensive plan, the by-pass is designed to displace Newport Way as a truck route. Much of the land surrounding Newport Way is designated multifamily. By the nature of the development that has been built there, these developments attract a substantial number of families with children. The development in this area was approved predicated upon the by-pass. Not following-through on that commitment will substantially detract from homeowners' property values in the area.

The route along East and West Sunset Way and Newport Way that is increasingly used as a truck route and is experiencing heavier traffic due to the Sunset Way Interchange. It is a mixed use area that needs to retain its pedestrian character to thrive and service residents. Multifamily residential developments with children present, retail businesses along this route and a number of high foot-traffic public facilities and attractions such as Memorial Field, the Senior Center, the Jail, the Library, the Fish Hatchery, and the elementary school make it unconscionable not to address the traffic and pollution concerns in this area. The number of children present makes continued use of this route as a truck route unsafe.

The traffic problems in Issaquah have taken decades to reach this point; it is naive to assume that a community of our size can continue without an additional North/South road.

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1. Impacts on air quality under Modified Alternative 5 are addressed in Chapter 3 of this Final EIS.

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2. As noted in the SDEIS, the proposed project is intended to support planned growth in the city. The proposed roadway would assist the City in meeting growth management goals associated with concurrency requirements.

3

3. The proposed project would construct a new principal arterial in the eastern portion of the city and is intended to accommodate traffic volumes that are causing congestion on Front Street, which is currently classified as a minor arterial. East Sunset Way is classified as a minor arterial, as is much of Newport Way, except for its extreme western limit where Newport Way becomes a principal arterial. As a principal arterial, the proposed SE Bypass roadway is intended to serve higher traffic volumes than East Sunset Way and/or most of Newport Way and would provide travel service past the downtown business area of Front Street. Minor arterials are intended to carry less traffic and provide more access to adjacent uses than the limited-access function of the proposed SE Bypass roadway.

It should be built and incorporate growth projections for at least ten years.

Please do not be swayed by those who oppose this project because it doesn't "solve all of the traffic problems." No reasonable person would anticipate that a single project could overcome decades of increasing congestion problems without new roadways to accommodate it. The point is that the project will help. Similarly there those who claim the project doesn't fit within any cost/benefit guidelines. This is gibberish. This project is to improve air quality, to preserve our downtown sub area, and is a public safety and public service project. These benefits are important - roads and public safety are the responsibility of city government precisely because the city is charged with meeting public safety needs. The private sector's cost benefit analysis criteria should not be applied to any public service project.

Lastly, please consider the time it would take to develop any alternative that would address the congestion and pollution problems downtown. Simply expanding existing North/South routes would not help and would further exacerbate downtown air and noise pollution. Any project that exercises the powers of eminent domain is difficult, the common good needs to be the overriding factor.

I believe I am one of hundreds of folks that have not been involved at every single phase of this process. Quite frankly I was frustrated at the very negative, vocal minority who dominated these discussions over the past years.

Thank you for your consideration.

Ellen Vaughn  
ellen.vaughn@worldnet.att.net  
(425) 557-5578

4

4. and 5. Your comments have been noted and will be considered in the City's decision for this project.

5

**Pam Fox**

**From:** kclutz@comcast.net  
**Sent:** Wednesday, July 14, 2004 11:16 PM  
**To:** Pam Fox; Pam Fox  
**Cc:** Mark Hinthorne  
**Subject:** Southeast Bypass DSEIS (and Draft Biological Assessment)

Please accept these comments on the draft supplemental environmental impact statement regarding the Southeast bypass project. Thank you for the opportunity to comment.

In general, we have two comments: (1) the SDEIS continues to understate the impacts of the "No-Build" alternative, and (2) the conclusions of the draft biological assessment that the project "may affect, and is likely to adversely affect" both chinook salmon and bull trout by incidental and temporary habitat disturbance is without merit, and would require otherwise unnecessary, costly and time-consuming biological opinions to be developed by both NOAA Fisheries and the US Fish and Wildlife Service.

1. The Draft BA "May Effect/Is Likely to Adversely Affect" Conclusion is Wrong and Will Cause Unnecessary Delay and Cost

Focusing first on the draft BA, none of the build alternatives are likely to kill, harm, harass or impair the essential breeding functions of either the Coastal/Puget Sound DPS of Bull Trout or the Puget Sound chinook salmon ESU. And there is no designated critical habitat for Puget Sound chinook. The draft assessment reaches its "may affect/likely to affect" conclusion by ASSUMING that some temporary habitat disturbance will temporarily create some slightly less favorable conditions for these fish. That is bald speculation, and it is the worst kind of "worst case analysis". Moreover, this conclusion would have significant, adverse regulatory (and cost) consequences to the City and the project. Given the respective current backlogs of NOAA Fisheries and USFWS, a document that triggers a biological opinion requirement for each of these agencies will result in a multi-year (probably minimum 5 year) delay - for absolutely no good environmental reason. Remember, NOAA Fisheries is currently authorizing harvest rates on listed Puget Sound chinook in excess of 40% in some rivers (e.g., the Skagit). USFWS has authorized recreational harvest of bull trout as long as it is consistent with WDFW's seasonal restrictions. If these ESA listed fish populations can survive yearly harvest on the order of 40% percent, then the temporary indirect impacts of bypass construction that may indirectly affect these fish populations' habitats will not affect, nor is likely to adversely affect, Puget Sound chinook salmon or Coastal/Puget Sound bull trout. And remember, the chinook we are talking about are either Issaquah hatchery chinook or recent progeny of Issaquah hatchery chinook, rather than a small, perilously threatened "wild stock."

The City should seek peer review of those conclusions in the draft BA before submitting a final Biological Assessment to NOAA Fisheries and the US Fish and Wildlife Service. This project will not jeopardize the continued existence or recovery of either of these species. The BA should find no effect on listed species (or on essential fish habitat under the Magnuson-Stevens Act).

2. The DSEIS Continues to Understate the Significant Adverse Environmental Impacts of the No Build Alternative

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1. The City's Concurrence 3 Package prepared for resource agencies reviewing the project under 404 Merger process guidelines found that the project will not adversely affect any ESA species or other significant biological resources since they either: 1) do not exist in the project area, 2) are not affected by the project location, or 3) will be protected by the project mitigation measures. A new Biological Assessment is being prepared for Modified Alternative 5 to support these conclusions and will be provided with this Final EIS.

7/15/2004

The remainder of these comments focus on the continued understatement of impacts of the "No-Build" alternative analysis set forth in the DSEIS.

We live at 835 Highwood Dr. SW, Issaquah WA, 98027. It is the first and only home we have owned as a family. The residents of Squak Mountain, positioned as it is south of Newport, east of SR 900, and west of Front Street/Issaquah Hobart, are very much affected by Issaquah's current gridlock. We submit these comments not as business owners in Issaquah (we're not), but as long-time residents.

In that regard, the opening of the new interchange (which is only assumed by the analysis in the DSEIS) has been a big improvement. But, to use an analogy, the patient's heart (Issaquah's traffic flow) may have started beating again, but the patient is it still on life support.

The current traffic situation in Issaquah is a daily headache for Issaquah residents. The SDEIS talks about potential future traffic patterns that will develop as people try to avoid traffic. Let me assure you, we already are using those techniques. We avoid Front Street at all costs. We use the side streets (and will continue to do so; they are our streets too). We drive down Sunset, up through Issaquah Highlands, and back down Black Nugget Road to get from Squak Mt. to Home Depot. We similarly avoid the Gilman/SR 900 intersection, employing a variety of strategies. Before the new interchange opened, we used to sometimes drive east on I-90, turn around at Highpoint, and then head back west. Since the new interchange opened, however, the traffic on Sunset to the new interchange has increased, and so it makes sense to use SR 900 (avoiding Gilman). We are highly skeptical that the new "Sound Transit/carpool" improvements to SR 900 will provide any practical improvement to our commuting conditions.

Our oldest daughter attended (and just finished) Clark Elementary, Issaquah Middle School, and Issaquah High. Our younger daughter attended Clark and is attending Issaquah Middle. Because the middle school schedule requires such early bus transportation, we choose to drive our daughters instead. We are very familiar with the traffic on Front Street in the morning.

Traffic is not just a quality of life issue in Issaquah, it is an issue of life and death. If the bypass had been built 5 years ago, the women who were killed on I-90 as they sat in the eastbound lane trying to exit at SR 900 would likely not have been killed. (That speculation requires far less imagination than the "may affect/is likely to affect" conclusions of the draft BA.) Similarly, my daughter was involved in a serious accident last February on Gilman, as a well meaning motorist waived her through the line of west-bound traffic waiting to turn right, and she was "T-Boned" by a car travelling in the center lane. The City cited her for improper driving, but in truth the City is at fault for allowing the current traffic mess to go unresolved. Luckily, our daughter was not seriously injured. She could have been killed as well.

When compared to these types of "environmental impacts" (which they are under SEPA and NEPA), the modest impacts to wetlands, and the displacement of a few families, are more than reasonable trade-offs. Somehow, the City, its consultants and the regulators have all allowed this regulatory review process to get so mired in the weeds of detail (and perceived environmental sleight) that the process seems to have lost sight of the bigger picture.

Having said that, we do appreciate the DSEIS's additional attention to the horrendous and ongoing effects of the No-Build alternative. We fully support completion of the required environmental studies and full funding of the project as quickly as it can be completed. Thank you again for the

7/15/2004

2

2. Your comments have been noted and will be considered in the City's decision for this project.

opportunity to comment. If this email is not an appropriate method for commenting, please let us know by reply email.

7/15/2004

July 27, 2004

SE Issaquah Neighborhood Alliance  
1101 Lewis Lane SE  
Issaquah, WA 98027-4706

Robert Brock  
Public Works Director  
City of Issaquah Public Works Department  
1775 12th Avenue NE  
Issaquah, WA 98027

RECEIVED  
JUL 30 2004  
PUBLIC WORKS ENG.

Re: *DSEIS comments and questions*

Mr Brock:

Thank you for receiving these comments regarding the DSEIS issued to the public June 2004. These comments have been compiled by individual members of our neighborhood. Topics from the DSEIS were divided up and many contributed to the research and writing our report. Some may also choose to address the DSEIS separate from this letter. We are a neighborhood of many talents, and many voices. We do not all share the same views on all subjects. However, respecting each others' individual style and utilizing each others' talents, we present you with a harmonious voice, our comments on The Southeast Issaquah Bypass Draft Supplemental Environmental Impact Statement.

We would appreciate a careful consideration of our concerns as well as a detailed written response to our comments and questions addressed to us as well as being formally included in the Final SEIS.

Sincerely,

SE Issaquah Neighborhood Alliance

CC: MAYOR, CITY COUNCIL MEMBERS, MEDIA, AND COMMUNITY MEMBERS



*Some of the SE Issaquah neighbors who contributed to the enclosed report.*

## DSEIS COMMENTS AND QUESTIONS

SE LEWIS NEIGHBORHOOD ALLIANCE

*"The need for the proposed project is the result of existing traffic volumes on city streets, and the necessity to increase mobility by reducing congestion and improving access to I-90. The purpose of the proposed project is to resolve these problems by reducing traffic volumes that are causing the two existing interchanges, and the Front Street corridor, to be overburdened" [DSEIS, Purpose and Need Statement, p 1-1].*

*"The City of Issaquah is committed to quality living through preservation and enhancement of the community's unique human and natural resource" [Vision Statement of the City of Issaquah].*

### TRAFFIC

Page 4-255 of the DSEIS describes the "irretrievable and irreversible" resources that would be required for the build options. The DSEIS presents the following justification for this negative impact on the community and natural resources:

*"The commitment of these resources is based on the concept that residents in the immediate area, region, and state would benefit from improvements to the transportation system. These benefits are expected to consist of improved accessibility and safety, time savings, and a great availability of quality services. Therefore, these benefits are anticipated to outweigh the commitment of the resources used in their construction." [DSEIS 4-255]*

The DSEIS does not adequately describe how the proposed bypass will meet the goals stated in its purpose statement to "improve access to I-90", "reduce traffic volumes... at the two existing interchanges", result in "time savings", or "improve accessibility and safety." In fact, many of the traffic models show that the bypass will act counter to these goals. Therefore, the bypass option does not justify the commitment of resources. The text of the DSEIS however, does not adequately address the negative impacts demonstrated by its own traffic models, nor does it adequately address the significance of the physical locations of both the negative and positive traffic impacts.

The following questions represent our concerns about the traffic impacts of the proposed bypass as they relate to the formal purpose statement:

#### 1. DO TRAFFIC VOLUMES IMPROVE?

The formal purpose statement specifically refers to "reducing traffic volumes that are causing the two existing interchanges, and the Front Street corridor, to be overburdened."

Does the DSEIS clearly demonstrate that the bypass will have this effect? We believe that it does not. For example:

1. The Table does not show an increase of 2,520 vph with the inclusion of the Bypass, nor does it show 237% increase. A screenline of Front St, Second Avenue and SE Bypass should be taken and then compared to the No-Action volumes of Front St & Second Avenue to make a traffic volume comparison.

If the screenline is taken, the following results indicate a more accurate measure of impact with the inclusion of the SE Bypass. Results indicate that the Bypass balances north-south traffic volumes more evenly and does not significantly attract new traffic volumes.

2030 PM Peak Hour				
	Northbound		Southbound	
	NA	Build	NA	Build
Front St	535	325	1700	675
2nd Ave	285	40	920	55
SE Bypass		855		2105
<b>Total peak hour volume</b>	<b>820</b>	<b>1220</b>	<b>2620</b>	<b>2835</b>

Screenline taken at approximately south of Clark St

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Table 23. 2030 PM Peak Hour Volumes for Build and No Action Scenarios

LOCATION:	No Action Scenario		Build Scenario	
	Southbound	Northbound	Southbound	Northbound
Bypass s/o I-90	-	-	2,520	1,000
Bypass n/o Iss-Hobart Road	-	-	1,830	595
Front Street s/o Newport	1,695	535	680	325
Front Street n/o Sunset	925	570	515	530
Front Street n/o Gilman	1,510	2,170	1,060	2,085
Second Avenue s/o Evans	895	270	25	15

[DSEIS Technical Report, p 49]

The above table from the DSEIS shows traffic volumes at selected locations with ("Build Scenario") and without ("No Action Scenario") the proposed bypass modeled for the year 2030. The volumes that the project is seeking to reduce, according to the purpose statement, are those "causing the two existing interchanges, and the Front Street corridor, to be overburdened." In Table 23, the congested volumes near the interchanges are labeled as "Front Street n/o Gilman" and "Bypass s/o I-90." The "Bypass s/o I-90" area would not exist in the "no action" scenario.

It is apparent from the table, that the southbound volumes at the Front Street interchange would be reduced slightly if the bypass was built (from 1,510 to 1,060 cars per hour). However, the bypass adds 2,520 cars per hour to its interchange that is right next to the Front Street interchange. This is a total increase of 2,070 cars (1,510 without the bypass vs. 3,580 with the bypass) or an increased volume at the interchanges of 237% as compared to the No Action scenario. Northbound predictions as well as the 2004 models, show similar results because the bypass will attract new traffic by encouraging new commuters to choose routes through Issaquah and will ease future development to the south and east of Issaquah.

- 2 DO TRAVEL TIMES IMPROVE?
- 3 IS ACCESS TO I-90 IMPROVED?
- 4 IS "ACCESSIBILITY AND SAFETY" IMPROVED?

These three questions are not easily answered by reading the DSEIS because the traffic changes due to the proposed bypass have mixed results. Table 2-6 from the DSEIS [page 2-19] shows that the waiting times at key intersections in downtown Issaquah sometimes improve, sometimes stay the same, and sometimes are worse when comparing the build and no build options. The most congested areas currently are those at Front Street near I-90 and on Issaquah Hobart Rd. These represent the end points of the project area as well as the key access points to the city of Issaquah. Both of these areas show an increase of travel times under the build scenario. According to the DSEIS:

*"The delays with the I-90 ramps are increasing in the Build Scenario for both AM and PM peak hours" [DSEIS Technical Report, p 51]*

This seems to show an effect exactly opposite that of the one desired according to the purpose statement!

The Issaquah-Hobart Rd is shown to be failing in both the morning and evening times. The traffic models show

1

2. Although in the year 2030, a slight decrease in operations may be observed at Front St and the I-90 interchange intersections, overall volumes on Front Street South decrease in the Build scenario. In addition, with the inclusion of the Bypass, and additional regional access point to I-90 is available for north-south traffic. Front St (near I-90) is only one of several points where traffic flows through to get to Issaquah Hobart Road, and thus is not an "end point". All streets heading southbound through Issaquah are considered in the traffic model. The SE Bypass is not directly intended to solve congestion at Front St near I-90.

2

3. The Issaquah-Hobart Road is designated as a rural facility and managed by King County. King County does not currently have plans to expand this roadway. In addition, traffic operations fail along Issaquah-Hobart Rd with or without the SE Bypass Rd. Delays on I-90 ramps are associated with the shifting of traffic patterns caused by the Bypass, and are not considered significant.

Congestion on Issaquah Hobart Road is predicted to get worse over the next 20 years, with the consequence of traffic backing up into Issaquah during the PM peak hours. King County will need to respond to this capacity deficiency as appropriate in accordance with regional policy. In the mean time, the City must continue to act on correcting its own traffic deficiencies with the assumption that neighboring jurisdictions will do the same. It is also important to recognize that the Bypass will provide other improvements to in-City traffic mobility that are independent of current and projected capacity problems with the Issaquah Hobart Road.

3



that this continues to fail although the difference is not quantified because of its failing condition. Common sense would show that Issaquah-Hobart would get worse with the addition of the bypass because of the overall increase in traffic volumes that the bypass creates. Remember that Front Street, 2nd Avenue, and the bypass will all end in an intersection that in turn, connects to Issaquah-Hobart road. Because each of the main access points to the city will be more congested with the build option, are travel times really going to improve? In particular, is it going to be easier to get to and from Issaquah for commuters, shoppers, and safety vehicles?

5 DOES THE BYPASS INCREASE MOBILITY BY REDUCING CONGESTION?

If the proposed bypass is built, overall traffic volumes in Issaquah will dramatically increase and the access points both at the north end, near I-90, and at the south end, near Issaquah Hobart Road. These are also currently the worst areas of congestion in Issaquah.

It appeals to common sense that creating a new bypass would increase overall volumes of traffic flowing through the city. However, the bypass also adds new capacity, so the question becomes, "Is congestion reduced by shifted a percentage of the existing volume to the new road?" (though the volumes are increasing overall). The DSEIS measures congestion by predicting wait times, in seconds, at controlled intersections. Table 2-6 from the DSEIS displays these wait times along with a letter grade (A through F). The table compares build and no build scenarios:

EIS Alternatives and Forecast Years			Intersection Name																
Forecast Year	SPAR	Southeast Issaquah Bypass		Front/WB Ramps	Front/EB Ramps	Front/Gilman	Front/Dogwood	Front/Sunset	Front/Clark	Sunset/WB Ramps	Sunset/EB Ramps	SE Bypass/Sunset	SE Bypass/Post Pointe Access	SE Bypass/Front (South C)	SE Bypass/Front (South A)	Iss-Hobart/ May Valley Rd.	Sunset/2nd SE	Bush/2nd SE	Front/2nd SE
Year 2000: Existing	No Build	No Build	AM	F >80	F >80	C 26	B 16	C 31	C 20	NA	NA	NA	NA	NA	NA	NA	A 7	A 7	F >80
			PM	F >80	F >80	E 72	B 13	E 76	C 30	NA	NA	NA	NA	NA	NA	NA	A 9	A 6	B 18
Year 2005: No Action	Build	No Build	AM	C 29	B 15	E 72	A 10	C 22	F >80	A 8	B 17	NA	NA	NA	NA	F 11	B 11	F >80	
			PM	E 57	E 57	F >80	D 43	C 27	C 33	A 6	B 15	NA	NA	NA	NA	F >80	C 29	F >80	
Year 2005: Build	Build	Build	AM	C 29	B 20	D 48	B 13	C 25	D 41	B 15	B 16	A 8	B 16	C 32	B 12	F >80	A 5	A 4	A <sup>2</sup> 4
			PM	D 53	E 75	F >80	B 12	B 19	B 17	B 12	B 18	A 8	B 12	B 17	C 24	F >80	A 5	A 16	B <sup>2</sup> 16
Year 2030: No Action	Build	No Build	AM	C 22	C 22	F >80	E 71	F >80	F >80	B 12	A 6	NA	NA	NA	NA	F >80	C 29	B 14	F >80
			PM	D 47	F >80	F >80	D 41	C 31	F >80	D 53	F >80	NA	NA	NA	NA	F >80	F 78	F >80	F >80
Year 2030: Build	Build	Build	AM	D 46	C 27	E 69	D 49	E 60	D 73	B 14	B 12	C 22	D 38	B 19	F >80	A 6	A 4	C <sup>2</sup> 25	
			PM	D 52	F >80	F >80	A 9	B 12	B 12	F >80	F >80	D 26	D 48	F >80	F >80	A 5	A 3	C <sup>2</sup> 29	

Notes: For signal controlled intersections, level of service is provided with letter grade (A through F) and corresponding average seconds of delay per vehicle during the peak hour

<sup>1</sup> - unsignalized intersection

<sup>2</sup> - Applicable to South A Alignment only

We have highlighted the wait times that correspond to those mentioned in the traffic volume discussion above. This report shows that the waiting times (representing congestion) would get worse for *both the Front Street interchange and the Sunset Interchange if the bypass is built*. This delay is the result of increased volumes as well as more complex travel patterns created by the additional road. Please note that morning traffic volumes as well as those modeled for the year 2005 demonstrate similar patterns. Additionally, the volumes and congestion would also be increased at the south end of the studied area if the bypass is built. This area is already failing according to Table 2-6.

If we revisit the Front Street volume "improvements" shown on Table 23, after noticing that the interchanges are more congested according to Table 2-6, the decreased volume could be interpreted another way. *Is it possible that volumes are decreasing on Front Street because congestion is increasing, and restricting traffic flow?* Traffic volumes can be decreased by two very different ways; one is to reduce demand, the other is to restrict flow (create congestion). If it is true that traffic volumes are decreasing due to increased congestion, it demonstrates a *complete and total failure* of the proposed bypass to meet the objectives of its purpose statement.

6 ARE THE MODELED IMPROVEMENTS TO TRAFFIC VOLUMES ON 2ND AVENUE REALISTIC CONSIDERING THAT IT IS A MAJOR DESTINATION FOR SCHOOL RELATED TRAFFIC DURING PEAK HOURS?

Much of the traffic improvements shown as a result of the proposed bypass relate to 2nd Ave even though it is not an area specifically addressed by the purpose statement. In fact, the modeled improvements on 2nd Ave are quite dramatic, showing in some cases almost a total disappearance of traffic on this street. There seems to be two obvious problems with this prediction.

The first problem is that 2nd Avenue is a major destination for many drivers because of several busy schools that are located on this street, including Issaquah High School. The traffic models only use *employment data* (page 9 Technical Report) to determine "trip attractions." 2nd Ave is itself a "trip attraction" in the real world and will continue to attract significant traffic whether or not the bypass is built.

The second problem with the traffic model is that 2nd Ave, on the South end, terminates at Front Street which turns into Issaquah-Hobart Rd in a short distance to the South. According to the DSEIS:

*"By year 2003, it appears that extensive queues will occur along Issaquah-Hobart Road, primarily due to the limited capacity and options available to access the area served by this facility. Extensive rolling queues may be observed throughout this corridor, and the peak congestion period is anticipated to spread for a longer period of time." [DSEIS 2-24]*

The increasing volumes of traffic exiting the bypass near this intersection as well as the massive congestion on Issaquah-Hobart Rd must have an effect on traffic heading south on 2nd Avenue as well. There is simply nowhere for the school traffic to go because of the congestion to the South. This effect does not seem to be included in the calculation.

7 ARE THERE ADDITIONAL GOALS MISSING FROM THE FORMAL PURPOSE STATEMENT?

Since it appears that the DSEIS fails to address the needs of its stated purpose, we would like to know if there are other goals of the project that have been left out of the purpose statement. For example, community members

4

4. Comments noted. The year of opening analysis has been revised to 2010 for this Final EIS. Traffic data for the proposed project indicate that Modified Alternative 5 would substantially improve operations for north-south travel conditions and accessibility to I-90 from Front Street and the proposed SE Bypass roadway.

5

5. Impacts at key intersections on 2nd Avenue are identified in Chapter 2 of this FEIS, for both 2010 and for 2030. This analysis indicates that under Modified Alternative 5, the level of service at these intersections along 2nd Avenue would improve, as compared with the No Action Alternative, in both the morning and evening peak hours.

6

6. The purpose and need for the project has not changed while the project has been under consideration. The Purpose and Need statement as shown in Chapter 1 of this Final EIS indicates that the proposed project is intended to reduce traffic congestion in the Front Street corridor and improve access at local interchanges. As a result of the proposed project, other impacts may follow, such as improvements in business conditions, changes in tax revenues, and/or enhanced mobility in the southeastern portion of the city.

have commented on the ratio of shoppers / commuters that may change due to the bypass and have commented that the bypass improves access and desirability of future development to the south and east portions of Issaquah. It has also been stated that the bypass may somehow contribute to increased tax revenue for the city. If these or other issues are influencing the selection of an alternative, the DSEIS should clearly address them in the purpose statement followed by analysis and commentary to describe whether or not the bypass will meet these goals. Please confirm whether or not the purpose statement adequately describes the needs and purpose for the project.

6

#### AIR QUALITY

As citizens of Issaquah and members of the SE Issaquah Neighborhood Alliance, we are concerned with significant increases in air pollution during the construction and operating phases of the proposed Southeast Bypass. In addition, we feel that because the project *fails to meet its stated purpose* as quoted at the beginning of the letter, air pollution will be worse than currently projected (see comment #11 below).

#### 8 THE DSEIS CONTAINS OUTDATED INFORMATION.

The second cover page of Appendix H [DSEIS June, 2004] indicates that the information used to create the DSEIS was updated in 2000:

*Technical Report  
Southeast Issaquah Bypass  
Air Quality  
December 2003  
Original publication: Parsons Brinckerhoff, 1998  
Updated: Parsons Brinckerhoff, 2000*

However, the DSEIS was released in June 2004, *four years later!*

No *actual data* for air quality was taken after the opening of the Sunset Interchange and secondary changes in traffic flow. Carbon monoxide levels were *predicted* using models for year 2000. The opening of the Sunset interchange has relieved Front St. congestion by allowing people additional access to I-90 westbound and the Issaquah / Sammamish Plateau. We require that current information is taken that reflects recent changes in traffic flow.

Information in the DSEIS regarding the intersection at the Sunset Interchange and three other intersections was modeled for concentrations of carbon monoxide using the outdated model, MOBILE5B. The DSEIS refers to MOBILE5B as "an updated version of the Mobile Source Emission Factor Model" using MOBILE5B for "analysis of the 2000 existing conditions" [Technical Report, App. H, p 13]. See the following data regarding updated source emission models:

*MOBILE6 was released in January of 2002. [US Environmental Protection Agency, Official Release of the MOBILE6 Motor Vehicle Emissions Factor Model, Federal Register: January 29, 2002 (Volume 67, Number 19)]*

*"EPA is approving and announcing the availability of the MOBILE6.2 motor vehicle emissions factor model for official use in particulate matter (PM10 and PM2.5), SIPs [State Implementation Plans]*

7. The project followed WSDOT air quality guidelines. These guidelines can be found at the following website:

<http://www.wsdot.wa.gov/fasc/EngineeringPublications/Manuals/EP/425.pdf>

The Final EIS has been updated to include projected traffic patterns and Mobile 6.2. Air quality impacts and mitigation requirements are based on the analysis for the year of opening and the design year. For the Southeast Bypass project, the air quality analysis for the year of opening (2010) and the design year (2030) include the effects of Sunset Interchange and secondary changes in traffic flow.

The Puget Sound Clean Air Agency (PSCAA) is responsible for monitoring, setting standards, and regulating development to achieve regional air quality standards in the King, Kitsap, Pierce, and Snohomish counties. For additional information regarding air quality in the region, please visit the PSCAA website at: <http://www.pscleanair.org> or call the PSCAA at 206-343-8800.

and transportation conformity determination outside of California. MOBILE6.2 is an update to MOBILE6 which adds the capability to estimate direct exhaust and brake and tire wear particulate matter emission factors..." [US EPA, Official Release of the MOBILE6.2 Motor Vehicle Emissions Factor Model and the December 2003 AP-42 Methods for Re-Entrained Road Dust, Federal Register: May 19, 2004 [Vol. 69, Number 97]].

"The conformity determination must be based on the latest emission estimation model available. Emissions to determine conformity to the MTP [Metropolitan Transportation Plan] and TIP [Transportation Improvement Programs] were calculated using MOBILE5b." [DSEIS Technical Report, Conformity Determination, App. H, p 27]

"The Regional Council's [Puget Sound Regional Council] air quality consultation partner agencies have agreed that MOBILES will continue to be used until the end of the grace period set by the EPA for converting to the new version of the model, MOBILE6. This grace period officially ends on January 29, 2004; all conformity analyses begun after that date will be performed using MOBILE6" [Puget Sound Regional Council, Air Quality Conformity Analysis, 2004 Destination 2030 Progress Report, March 11, 2004].

In the References Section of App. H of DSEIS, the articles cited from the US Environmental Protection Agency regarding modeling air quality are from the late 1980's and early 1990's.

The Final SEIS must include a study of current traffic flow patterns, numbers, etc. with current data and updated modeling methods such as MOBILE6 or MOBILE6.2 as cited above in more current information released by the US Environmental Protection Agency and the Puget Sound Regional Council.

9 THE DSEIS DOES NOT STUDY SPECIFIC POLLUTANTS REQUIRED BY THE NATIONAL AMBIENT AIR QUALITY STANDARDS

The DSEIS only addresses carbon monoxide concentrations for "predictions of existing and future localized air pollution" [DSEIS, App. H, p 13] and PM<sub>10</sub> for construction phase only. It does not measure particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), ozone, sulfur dioxide, lead nitrogen dioxide: the criteria air pollutants that must be included in order to conform to National Ambient Air Quality Standards ("NAAQS"). According to the DSEIS, any new transportation project must conform to the NAAQS:

"Nonconformance with NAAQS may threaten funding of transportation projects in the area" [DSEIS, p 4-2].

To meet NAAQS requirements, ground-level ozone ("O<sub>3</sub>") and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) must be measured. Unfortunately, "predictions of existing and future localized air pollution concentrations in the project vicinity for this and most other roadway air quality studies are for CO [carbon monoxide] only" (DSEIS, App. H, p 13). The DSEIS did not include measurements of two of the greatest contributors to air pollution as measured by the Air Quality Index ("AQI"): ground-level ozone (O<sub>3</sub>) and particulate matter (PM<sub>2.5</sub>).

"Any organization that is collecting and evaluating environmental data must be concerned with the quality of their results. Since data received from the PM<sub>2.5</sub> monitoring network will be used by decision makers regarding NAAQS attainment, a quality assurance program [PM<sub>2.5</sub>] was adapted to limit monitoring bias within an acceptable level so that decisions can be made confidently [US Environmental Protection Agency, PM<sub>2.5</sub> Objectives and History, Laboratory and Field Operations

7

(7. Cont'd) The EPA (Environmental Protection Agency) has set National Ambient Air Quality Standards (NAAQS), which specify maximum concentrations for carbon monoxide (CO), particulate matter less than 10 micrometers in size (PM<sub>10</sub>), particulate matter less than 2.5 micrometers in size (PM<sub>2.5</sub>), ozone, sulfur dioxide, lead, and nitrogen dioxide. The project area is in compliance with these standards for all pollutants, but because the Carbon Monoxide (CO) standards have been recently attained, the project is in a CO maintenance area, therefore local intersection level CO analysis is conducted.

Additional qualitative analysis of mobile source air toxic emissions has been conducted for the Modified Alternative 5 which is the preferred alternative. Studies indicate that due to tighter EPA fuel regulation, mobile source air toxic emissions are predicted to decrease.

Noise analysis for the Southeast Issaquah Bypass project followed WSDOT's policy and procedures document. Please see the following website for the guidelines followed for this projects analysis:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/policies.htm>

– PM<sub>2.5</sub>, US EPA web site].

*"Air quality emissions in the Puget Sound Region are currently managed under the provisions of Air Quality Maintenance Plans ('AQMP') for ozone and CO... Any regionally significant transportation project in the Puget Sound Air Quality Maintenance areas must conform to the AQMP. Conformity is demonstrated by showing that the project would not cause or contribute to any new violation of any NAAQS... the EPA has established National Ambient Air Quality Standards ('NAAQS'), which specify maximum concentrations for carbon monoxide ('CO'), particulate matter less than 10 micrometers (PM<sub>10</sub>), particulate matter less than 2.5 micrometers in size (PM<sub>2.5</sub>), ozone, sulfur dioxide, lead, and nitrogen dioxide" [DSEIS, App. H, p7]*

*"No exceedances of the national ambient air quality standards for CO were predicted to result from any of the build alternatives for the years 2005 and 2030. Therefore, no new significant adverse impacts would be created or worsened by the project... and mitigation would not be required for any of the alternatives" [DSEIS, App. H, p 2-3].*

Because a complete set of the criteria pollutants including particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>) and ozone have not been measured / modeled for the proposed alignments, a conclusion *cannot be made* that NAAQS will be exceeded.

According to the DSEIS, "Total CO emissions in the atmosphere from automobiles are greater than the emissions of all other pollutants combined" [Methodology, App. H., p 13]. However, ozone and particulate matter are more significant causes of air pollution than CO. "Although five criteria pollutants can contribute to the Air Quality Index ('AQI'), the index is driven mostly by ozone ('O<sub>3</sub>'). Soon, PM<sub>2.5</sub> will also be monitored and reported on a regular basis, which will reduce the percentage of days that ozone is the greatest AQI pollutant [US Environmental Protection Agency, Criteria Pollutants-Metropolitan Area Trends, Status: 2001 section].

According to the DSEIS [p 4-2], "particulate emissions are primarily construction related." Therefore, the DSEIS does not address particulate emissions, PM<sub>10</sub> and PM<sub>2.5</sub> directly resulting from *traffic* generated by the bypass. However, "the sources of PM<sub>2.5</sub> include fuel combustion from automobiles... and diesel powered vehicles such as buses and trucks" [US EPA, PM<sub>2.5</sub> Objectives and History]. Proposed alignments of the SE Bypass are adjacent to three schools and the Issaquah School District bus storage facility. School buses will be using the SE Bypass along with gravel trucks that already travel north and south on Issaquah-Hobart road to Front St. South to gain access to I-90. Will the bypass allow garbage trucks, another significant source of particulate matter, to use this road?

*"PM<sub>10</sub> enters the air from automobile, bus and truck exhaust" [Puget Sound Clean Air Agency, What is Air Pollution?, Puget Sound Clean Air Agency web site].*

*"Fine particle pollution and air toxics are bigger public health issues for the Puget Sound Region" [American Lung Association of Washington, "The 'State of the Air' in Western Washington: King County Earns a 'D,' Pierce County 'C,' Thurston a 'B,' for Ozone in American Lung Association Report, Media Release, May 1, 2002].*

Particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>) is not just an issue during construction and therefore data *needs* to be included in the DSEIS.

Air pollution has been proven to have devastating impacts upon people's health:

*"Fine particle pollution and air toxics are bigger public health issues for the Puget Sound Region"*

[American Lung Association of Washington, The "State of the Air" in Western Washington: King County Earns a "D," Pierce County a "C," Thurston a B" for Ozone in American Lung Association Report, May 1, 2002].

Asthma is "related to concentrations of O<sub>3</sub> [ground-level ozone], PM<sub>10</sub>, PM<sub>2.5</sub>, and SO<sub>2</sub> [Sulfur Dioxide]" [National Air Quality and Emissions Trends Report 2003, Development of a New Reporting Technique for Air Quality, pp S63-S68].

"Ozone... increases the risk of respiratory and heart diseases. Ozone reduces the lung function of healthy people during exercise, can cause breathing difficulty to susceptible populations (such as asthmatics and the elderly)" [DSEIS, App. H, p 10].

"These tiny particles (PM<sub>2.5</sub>) ...have been scientifically linked to serious human health problems including premature death from heart and lung disease; chronic bronchitis and asthma; increased hospital admissions and doctor and emergency room visits; and absences from work and school" [Environment News Service, EPA prepares for New Fine Particle Air Quality Standard, June 30, 2004].

"Under the Clean Air Act, EPA establishes air quality standards to protect public health, including the health of "sensitive" populations such as people with asthma, children, and older adults" [US Environmental Protection Agency, Six Principal Pollutants, Air Trends, US EPA web site].

The SE Issaquah Neighborhood Alliance is particularly concerned with air quality during and after construction of the proposed bypass since members of our neighborhood fall into the "sensitive" population: children, older adults, two adults diagnosed with asthma and one child diagnosed with Reactive Airway Disease. The City of Issaquah should be equally concerned with particulate matter given the city's vision statement.

10 THE DSEIS DOES NOT ADDRESS LOCAL TOPOGRAPHY AND RESULTING WIND IMPACTS UNIQUE TO THE ISSAQUAH VALLEY ALONG THE TWO SOUTHERN ALIGNMENTS OF THE BYPASS.

Because our neighborhood is in a valley surrounded by two mountains, Tiger and Squak, our air tends to be more stagnant than other local areas. This is the same valley in which the proposed Southeast Bypass would be built.

The DSEIS predicts carbon monoxide concentrations using CAL3QHC. "CAL3QHC predicts peak one-hour pollutant concentrations based on stable meteorology and peak-hour traffic flow. This study assumed a wind speed of 1 meter..." (App. H, p 14). The DSEIS discusses climate under section of Weather:

"Weather directly influences air quality. Important meteorological factors include wind speed and direction, atmospheric stability, temperature, sunlight intensity, and mixing depth" (App. H, p 9).

This does not consider the impacts of the Issaquah Valley topography.

Issaquah is in a trend of hotter summers with many days in the 80's and approaching or surpassing 90 degrees. Higher temperatures combined with stagnant air and increased emissions lead to increase in pollutants and significant decrease in air quality. If additional traffic volumes are added to the area with the proposed bypass and additional homes are built with the proposed Park Pointe development, significantly increased levels of pollutants are added to the valley and must be measured to meet National Ambient Air Quality Standards ("NAAQS"):

8

8. Please see response to comment No. 7 above. Additional traffic volumes (including congestion effects) as well as the additional home in Park Pointe were included in the localized air quality analysis. Regional analysis is conducted by the Puget Sound Clean Air Agency (PSCAA).

*"In order to predict CO [Carbon Monoxide] concentrations, certain meteorological parameters must be determined... stability, class, wind, speed, and wind direction... The more stable the air is, the less able it is to disperse pollutants, so... in a stable atmosphere, the pollutant concentrations are higher than those in an unstable atmosphere" [Draft Environmental Assessment, Mohawk Resort and Casino, Nov., 2003, p 14-1].*

*"Temperature inversions, which are associated with higher air pollution concentrations, occur when warmer air overlies cooler air. During temperature inversions in late fall and winter, particulates and CO from wood stoves and vehicle sources can be trapped close to the ground, which can lead to violations of the NAAQS" [DSEIS, App. H, p 9].*

*"Temperature inversions are relatively common in the Puget Sound area... Inversions also occur during the summer months... The result is the same... we are unable to rid ourselves from the everyday pollution we create. Air pollution will continue to accumulate until the weather pattern changes" [Puget Sound Clean Air Agency, "What is an inversion," Air Quality section on web site].*

In addition to hotter summers influencing an increase in stagnant air and air pollution, temperature inversions in the winter can cause air pollution to be trapped close to the ground. Combined with air pollution being trapped in a valley, South Issaquah is a sensitive area prone to significant increases in air pollution all year.

It only takes 1-2 days of temperatures in the high 70's and up for Issaquah to notice decreased visibility or haze surrounding Tiger Mountain.

*"Visibility impairment is one of the most obvious effects of air pollution and occurs at many of the best known and most treasured natural parks and wilderness areas, such as... Mount Rainier... as well as in urban area... Visibility impairment results from the scattering and absorption of light by air pollution, including particles and gases... Some particles that contribute to visibility impairment are emitted ...from their sources, such as dust from roads" [US Environmental Protection Agency, Visibility, Air Trends, EPA web site].*

The DSEIS needs to address local impacts of regional pollutants due to the significant impact of the the topography of Issaquah Valley. This leads to increased occurrence of stagnant air during periods of higher temperatures. Actual measurements of carbon monoxide, particulate matter, ground-level ozone need to be measured. Living in a valley that tends to trap air needs to be considered in addition to the impacts of other meteorological phenomenon such as temperature inversions that trap air pollution. The DSEIS needs to address the impacts of additional traffic volumes as well as the development of additional homes in Park Pointe on air quality in our valley.

- 11 THE NUMBER OF LIGHTS AND ON/OFF ROADS ALONG THE SOUTH C AND SOUTH A ALIGNMENTS WILL SLOW TRAFFIC, CAUSE BACKUPS AND LEAD TO AN INCREASE IN AIR POLLUTION.

*"Total emissions are increased by acceleration, deceleration, and idling modes which directly result from interrupted traffic flow on congested roadways [Draft Environmental Assessment, Mohawk Resort and Casino, November, 2003, p 14-1].*

Three stop lights on both alignment A and C will cause queues onto Front St. South and Issaquah-Hobart Road, therefore increasing acceleration / deceleration of cars as well as increasing idling times:

South C alignment	South A alignment
Stop light at 2nd Ave SE	Stop light at 6th Ave SE
Entrance / Exit to local neighborhood	Two (2) entrances / exits to LDS church
Entrance / Exit to Park Pointe	Entrance / exit to Park Pointe
Stop light at Park Pointe	Stop Light at Park Pointe
Stop light at Sunset	Stop Light at Sunset

"Free-flow traffic was modeled at the posted speed limit" [DSEIS, App. H p 14]. Given the existing data that there will be increased congestion on the bypass due to regional impacts such as I-90 and Issaquah-Hobart congestion, the DSEIS should measure speeds lower than the speed limit, a more realistic measure during peak traffic times. The DSEIS needs to report on impacts of I-90 and Issaquah-Hobart congestion, how these roads will increase queuing on the bypass, and the impacts of increased congestion on air quality in the Issaquah Valley.

During am peak hours, I-90 is congested from the Sunset Interchange west toward Bellevue. If cars cannot get onto I-90 quickly, traffic will lead to queuing onto Front St. South. With documented evidence that Issaquah-Hobart is failing, queues will occur on Front St. South and the bypass due to cars trying to go south in the PM. Anecdotal evidence suggests that the May Valley Road and Issaquah-Hobart intersection are currently failing during both the AM and PM peak hours. Traffic projections also show that the intersection of May Valley Road and Issaquah-Hobart Road will fail in both 2005 and 2030 during both peak hours in the No Action and Build Scenarios" [DSEIS, p 2-24].

With additional cars the bypass will attract from other areas in Issaquah and south King County, in addition to cars from Park Pointe, the roadway will quickly fill up and cause increased congestion and therefore increase in air pollution.

*"Because the roadway [Southeast Issaquah Bypass] is expected to attract vehicles currently using other key streets in the city, including Front Street South and Newport Way, it would also support other planned projects, such as the recently approved East Cougar Village development on the west side of the city" [DSEIS, p 4-270].*

If cars cannot get onto I-90 quickly using the Southeast Bypass, then cars will use Front St.

As a result of increasing traffic volumes, we will have *multiple* congested roads, including the proposed bypass, which will significantly increase the air pollution.

#### NOISE

##### 12 NOISE MITIGATION IS REQUIRED FOR THE SE ISSAQUAH NEIGHBORHOOD.

The DSEIS forecasts traffic noise increases up to 15 dBA for the SE Issaquah Neighborhood. This will not be reasonable, and Alternatives 1 through 6 require mitigation to limit noise level increases to 3 decibels for receptors L, N, and Q when compared to Alternative 7 (No Action) for the year 2030.

The Alternatives 1 through 6 create significant increases in noise levels for receptors L, N and Q, in some cases



consisting of a trebling of perceived noise levels. This statement is based on the information in Figure 4-2 on page 4-10, Table 4-5 on page 4-13 and page 6 of the Noise Technical Report (Appendix G), which states:

*"The human ear can barely perceive a 3 dBA increase, but a 5 or 6 dBA increase is readily noticeable and sounds as if the noise is about one and one-half times as loud. A 10 dBA increase appears to be a doubling in noise level to most listeners." [DSEIS, Technical Report, App G, p6]*

The DSEIS clearly identifies that in several instances the noise level increase exceeds federal, state and local standards, but no mitigation is considered reasonable based on the cost per household. These comments argue that any expense necessary to protect our property from damage affecting livability and value is a reasonable. Furthermore, these comments argue that significant increases in noise levels will both reduce livability and lower property values, based on the "Effects of Noise" section on page 11 of the Noise Technical Report (Appendix G).

#### CONSTRUCTION ISSUES

The construction phase of the South A and South C alignments of the SE Bypass, will encroach on and diminish many aspects of the quality of life for those of us in the Southeast Issaquah neighborhood. The affects of the construction phase on our quality of life are far reaching. Our concerns range from the diminishment of our air quality; the effects this will pose on our health and well being, the irreversible physical changes and damage to our neighborhood, including the decreases in vegetation and wetlands, the thwarting of wildlife, and the physical destruction of our own neighborhood, as well as the lack of connectivity of our neighborhood to the larger Issaquah community. The construction phase of the SE Bypass is scheduled for at least a two year period, and we are greatly concerned with the long and short term effects of the noise generated during this project, as well as the impacts this project will have on our privacy. In addition, our property values will decrease during the construction period. The DSEIS is dismissive and fails to adequately address the impacts of the construction phase of the South A and South C alignments as they relate to our neighborhood. We demand a thorough and comprehensive look at these issues, their effects and mitigations.

We live in our neighborhood by choice. We enjoy the rural flavor, the wildlife, the dense trees, wetlands, the low density area, and boast a diverse, caring, and connected neighborhood community. The construction phase of the SE Bypass, and its aftermath will leave our neighborhood a damaged and different place. According to the DSEIS, in the South A alignment, six homes in our neighborhood will be destroyed, three of our homes will be within one hundred feet of the construction site and final roadway, and five of our homes will be within two hundred feet of the construction work and the final roadway. In alignment C one neighborhood house will be within three hundred seventy-five feet of the construction site and the final roadway, two houses will be situated four hundred seventy-five feet or less from the construction site and final roadway. Other neighborhood houses will also realize the effects of this construction.

#### 13 AIR QUALITY ISSUES DURING CONSTRUCTION ARE NOT ADEQUATELY ADDRESSED.

*"Dust from construction would be noticeable if uncontrolled." [DSEIS 4-233]*

*"Particulate emissions would vary from day to day depending on the level of activity, specific operations and weather conditions. Particulate emissions would depend on soil moisture, silt, content of soil, wind speed, and the amount and type of equipment operating." [DSEIS 4-233]*

9

9. When noise levels are predicted to exceed 66 dBA in the State of Washington, a noise impact is identified. FHWA regulations (23 CFR 772) specify that when noise impacts are identified, abatement (mitigation) measures must be evaluated. If abatement measures are found to be both feasible and reasonable, then abatement measures must be incorporated into the project design. If an area exceeds 66 dBA, but does not meet both the feasibility and reasonableness criteria, noise mitigation is not required.

10

10. The plans and specifications for the Southeast Issaquah Bypass project will follow City and WSDOT requirements for Federal-aid projects. This includes detailed City and State requirements for temporary erosion and sediment control during the construction. Implementation of the NPDES Phase II Stormwater Permitting program in 2006 by the Department of Ecology, which the City of Issaquah must abide by, will ensure that local codes will require all necessary Best Management Practices to control construction site runoff. These standards will be strictly enforced by project management, on-site inspection, and contractual specifications. The construction analysis for the air quality and noise was conducted following WSDOT's Environmental Procedures.

*"In addition to particulate emissions heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO and NOx in exhaust emissions." [DSEIS 4-233]*

There are no references or mitigations made in the DSEIS during the construction phase of the SE Bypass in relation to weather conditions, adapting to weather conditions, or creation of a work plan in relation to weather conditions. As we have seen an increase in hotter and more stagnant summer weather in the area, a rise in asthma for the elderly, youth, and other populations, the influence of weather must be thoroughly researched as it impacts dust, particulate matter, and pollution in our community. In our neighborhood there are people diagnosed with asthma, reactive airway disease, as well as with dust allergies. The construction section of the DSEIS fails to measure the following criteria pollutants that contribute to the Air Quality Index ("AQI") and need to conform to the National Ambient Air Quality Standards ("NAAQS"), including sulfur dioxide, lead nitrogen dioxide and the two greatest contributors to air pollution as measured by AQI: ground level Ozone, O<sub>3</sub>, and particulate matter, PM<sub>2.5</sub>. In Appendix H of the DSEIS Technical Appendices, as well as in the DSEIS, predicted CO levels during the construction phase are predicted using outdated models. CO was modeled using MOBILE5B for the year 2000 existing conditions. We call for the use of updated models as well as a reflection of current traffic conditions.

Appendices H, Air Quality Technical Report of the DSEIS, p. 25: "Operation: Because no exceedance of NAAQS are predicted, no design or operational changes would be required." This statement is unacceptable because of the lack of current and comprehensive data utilized in the construction portion of the DSEIS.

*"In addition to particulate emissions heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO and NOx in exhaust emissions. These emissions would be temporary, limited to the immediate area surrounding the construction site, and would contribute a small amount compared with automobile traffic in the project area." [DSEIS 4-223]*

The DSEIS compares the emissions of the heavy equipment used in construction to the automobile traffic. This logic fails, we need to see these emissions calculated and added to the existing automobile calculations in order to accurately assess the effects of the trucks and construction equipment on air quality.

*"In particular traffic along East Sunset Way and Front Street South would be affected when the Southeast Issaquah Bypass is connected to existing streets." [DSEIS 4-246]*

*"Potential travel delays and traffic congestion could occur as construction takes place. Residents of the East Sunset Way and 6th Avenue Southeast neighborhoods also could experience disturbances from noise and dust during construction." [DSEIS 4-244]*

*"School bus routes that use East Sunset Way or 6th Avenue SE could be affected by traffic congestion and travel delays during construction." [DSEIS 4-244]*

*"Bus routes using East Sunset way could experience travel delays and traffic congestion during construction." [DSEIS 4-246]*

*"...because some equipment would be turned off, idling..." [DSEIS 4-225]*

The DSEIS fails to adequately address the impacts on air quality due to the traffic delays occurring during the construction of the SE Bypass. "Total emissions are increased by acceleration, deceleration and idling modes which directly result from interrupted flow on congested roadways." [Draft Environmental Assessment, Mohawk Resort

11

11. The most recent version, Mobile 6.2, was used to model the proposed alternative, Modified Alternative 5. The project is in attainment for all National Ambient Air Quality Standards.

The project followed WSDOT air quality guidelines. These guidelines can be found at the following website:

<http://www.wsdot.wa.gov/fasc/EngineeringPublications/Manuals/EPM/425.pdf>

and Casino, November, 2003, p 1-14]

In addition, the effects of stagnant buses powered by diesel fuel (City, Metro, school) as well as the influence of diesel powered trucks and equipment at the SE Bypass construction sites, for both South A and South C alignments, have been neglected in the DSEIS studies.

*"UCLA researchers show that diesel exhaust particles have the intrinsic ability to induce acute asthma flares. A new testing procedure in animals helped these researchers to better define the acute effects of diesel exhaust particles in asthma." [American Academy of Allergy, Asthma and Immunology, JACI Highlights, November 2003.]*

Please reference the following abstracts:

- A Diesel exhaust particles exert acute effects on airway inflammation and function in murine allergen provocation models, Minqi Hao, PhD, Stephania Comier, PhD, et al. - The Journal of Allergy and Clinical Immunology, November 2003, Volume 112, Number 5;
- B Chemical constituents of diesel exhaust particles induce IL-4 production and histamine release by human basophils, by Gilles Devouassoux, MD, Andrew Saxon, MD, et al. - The Journal of Allergy and Clinical Immunology, May 2002, part 1, Volume 109, Number 5,
- C Diesel exhaust particles directly induce activated mast cells to degranulate and increase histamine levels and symptom severity, by Diaz-Sanchez, D, Penichet-GarciaM, Saxon A., The Journal of Allergy and Clinical Immunology, November 2003, Volume 112, Number 5.

14. PROPERTY DEVALUATION IS NOT PROPERLY ADDRESSED IN THE DSEIS.

*"During construction, increase in air, noise and traffic impacts in the immediate construction area could temporarily affect property values." [DSEIS 4-248]*

*"Property Values: During construction, increases in air, noise, and traffic impacts in the immediate construction area could temporarily affect property values. As such, property values should not be expected to be greatly affected over the long term." [DSEIS 4-248]*

*"Existing visual quality ratings generally rank at the "high average" level throughout the project area. Because the proposed project would decrease vegetative views and allow development and human-made features to further encroach on existing neighborhoods, the overall developed ratings would be lower." [DSEIS 4-211]*

*"The project area's existing character would be altered by the presence of a new arterial. Although mitigation measures are expected to reduce this impact, the proposed project would introduce a major roadway in the sparsely developed project area." [DSEIS 4-255]*

These statements point to some of the glaring inconsistencies of the DSEIS. The implication of these statements are clear: property values in our neighborhood will decrease during the construction phase as well as after completion of the SE Bypass. Construction brings irreversible devaluation to our neighborhood. As individuals and community members we not only face economic diminishment of our homes, neighborhood, and livelihoods, we are also faced with degradation of all aspects of our quality of life. The DSEIS fails to confront these powerful and looming issues.

12. Property values are influenced by many different factors and any decrease in value that may occur during construction would be temporary. The DSEIS indicates that real estate decisions are influenced by many factors and the proposed project is not expected to result in substantial impacts on local property values. Economic conditions, geographic considerations, existing and future traffic conditions, and future planned development are among the many influences that may affect how property is valued by agencies and the public.

15 VISUAL QUALITY ISSUES DURING CONSTRUCTION ARE NOT ADEQUATELY ADDRESSED.

The visual degradation during construction of the SE Bypass includes: loss of our views, loss of wildlife, loss of vegetation and wetlands, views of trucks and construction sites (many of us will be front seat viewers as we reside in extreme proximity to both the South A Alignment and the South C Alignment ), views of construction barriers and walls, visual disturbances relating to vehicle lights and glare, and our privacy will be impacted as workers and vehicles will be in constant motion in our neighborhood. In the South A alignment we will be forced to watch the destruction of our own close knit community, as six of our neighborhood families will be evicted, and their houses will under go demolition. Due to the delays and congestion caused by the construction of the SE Bypass we will become separated from the larger Issaquah community as well.

The only 'visual quality' mitigation listed in the construction section of the DSEIS, states:

*"Project staging and storage area should be located away from existing neighborhoods and outside the view range of local trails whenever possible. Construction hours could be limited, especially during evening hours to avoid visual disturbances related to vehicle lights and illumination." [DSEIS 4-253]*

The language in this mitigation is vague, with the use of words like 'should,' 'could,' and 'possible.' We need specific details as to constructions practices and actual mitigations. The above mitigation in the DSEIS suggests working shorter hours, yet, in an earlier section there is discussion of receiving a permit from the city of Issaquah to extend construction working hours, as the city limits hours from 7am to 6pm (DSEIS 4-8). Lengthening hours rather than shortening hours is contrary to what is suggested in this and other mitigation sections of the DSEIS. In the summer, most of us enjoy being outdoors in the evenings, delighting in the lighter and cooler nighttime air with our children, friends and neighbors. The construction will be a glaring distraction to our relaxing summer evenings. The demolition of our established natural landscapes which provide visual beauty, air quality enhancement, and habitat for wildlife will be lost and virtually left unmitigated.

16 WILDLIFE AND VEGETATION ISSUES DURING CONSTRUCTION ARE NOT ADEQUATELY ADDRESSED.

*"Vegetation removal during construction would result in displacing or eliminating wildlife within the construction area and adjacent habitats. Less mobile wildlife such as nesting birds, small mammals, reptiles, and amphibians would be affected. Animals that nest and forage in surface soils and plant communities disturbed by construction could suffer direct mortality or be displaced into adjacent habitats... Because wildlife populations are generally maintained at or near full capacity, most wildlife displaced from the project area would likely perish." [DSEIS 4-240]*

Wildlife is a constant presence in our neighborhood; daily sightings include a variety of song birds, hawks, woodpeckers, butterflies, squirrels, rabbits, deer, coyote, bear, etc. This unique and precious aspect of our neighborhood is essential to us and is part of the defining culture of our neighborhood. The DSEIS fails to adequately address the loss of wildlife and vegetation in our neighborhood and the surrounding areas, during the construction phase of the SE Bypass.

*"The City of Issaquah is committed to quality living through the preservation and enhancement of the community's unique human and natural resources." [City of Issaquah Vision Statement.]*

13

13. The DSEIS visual analysis followed appropriate state and federal guidelines and was reviewed and approved by FHWA and WSDOT prior to issuance of the SDEIS.

As the DSEIS notes, potential visual quality impacts during construction would be temporary and would occur at different times and locations along the proposed project route. Mitigation measures proposed for specific elements, such as for air quality, are not repeated under visual quality, although they could help prevent negative impacts on local views. The proposed project would likely proceed in phases which would assist in limiting changes related to clearing and grading in any one part of the project area. This would minimize impacts on local vegetation. If warranted, temporary vegetative screening, or other barriers, could be used to reduce light and glare and help block views of construction activities. The final hours for construction have not yet been determined, and it is possible that permits may be sought to extend the duration of some activities. Extended construction hours would only be allowed through review and approval by the City of Issaquah.

14

Perhaps this statement could help to inspire a more effective and acceptable wildlife and vegetation plan in the DSEIS.

17 NOISE ISSUES DURING CONSTRUCTION ARE NOT ADEQUATELY ADDRESSED.

*"Limiting noisier construction activities to between 7AM and 10PM, to comply with Department of Ecology (Ecology) noise regulations and reduce construction noise impacts during sensitive nighttime hours." [DSEIS 4-227]*

As stated earlier in the visual section of this discussion, the construction work time is an increase in length rather than a decrease. This time frame allots fifteen hours of construction noise and vibration a day (weekends clock in at nine hour days, unless the city allows extensions, [DSEIS 4-8]). Our proximity to both the South A and South C construction sites leave the residents of this neighborhood with excessively long daily exposure to noise and vibration. Most of us open our windows during the spring, summer and early months of fall, there is not one air conditioner in the neighborhood that we know of. We will be bombarded by noise and vibration day and night. During the summer and early fall most of us can be found outside on weekends and into the night. The incessant bombardment of construction noise and vibration is, said simply, extremely bothersome. Our children's daily routines will be disrupted: play, homework, music study, naps and sleep will be greatly disturbed. Adults will be affected by the noise and vibrations as these distractions will compromise our daily routines, effecting our businesses and those studying and working at home. Our sleep will be disrupted as well. The mitigations listed in the DSEIS are simplistic and inadequate. Furthermore, the DSEIS leaves the door open for nighttime construction even though the disruptive effects of nighttime construction are not addressed. [DSEIS, Technical Report, App G, p 12]

*"Construction would usually be carried out in several reasonably discrete steps, each with its own mix of equipment and consequently own noise characteristics." [DSEIS 4-225]*

The DSEIS does not study the noise and vibration impacts of the combined effects of construction equipment of the southeast bypass and the construction of the proposed Park Pointe development.

18 FLOODING ISSUES DURING CONSTRUCTION ARE NOT ADEQUATELY ADDRESSED.

The SE Issaquah Neighborhood Alliance is concerned about the construction and long-lasting impact of the South C alignment and related mitigations. One area of specific concern is Mitigation Site #1 and Buffer Enhancement Site #4 [Figure 6, Tech. App., p26] "located in a farm field northwest of the intersection of SE Kramer Place and Sixth Avenue SE" [Tech. App., p 25]. Major construction will be needed to excavate fill material and backfill "to match the grade of the adjacent wetland [Tech. App., p 27].

*"The property [Wetland Mitigation Site # 1] should be available for purchase... should be available for permanent dedication as open space" [Tech. App. P 21].*

The DSEIS does not guarantee that this land will not be developed. If development occurs, that negates the legal purpose of creating this wetland which is to mitigate for destruction of existing wetland secondary to the South C alignment.

14. The DSEIS acknowledged that species would be lost and habitat eliminated by construction activities. It also indicated that mitigation would be provided through retention of vegetation where possible and Best Management Practices to prevent harm to streams and wetlands and other nearby habitat areas. Additional information on impacts and mitigation for wildlife under Alternative 5/Modified Alternative 5 is provided in the discussion of wildlife and vegetation in Chapter 3 of this FEIS.

15

15. Noise analysis in the State of Washington must follow WSDOT's policy and procedures document. Please see the following website for the guidelines followed for this projects analysis:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/policies.htm>

16

16. Since issuance of the SDEIS, floodplain issues have been reviewed for Alternative 5/Modified Alternative 5. Potential floodplain impacts are expected to be compensated on nearby properties. With mitigation the proposed project is expected to have no effect on 100-year flood levels. Please see the Concurrence Point 3 Packet for additional information on flooding issues during construction.

"The property [Wetland Mitigation Site #1] should be easily accessed from a public road" [Tech. App., p 21]. The DSEIS must clarify the route of these vehicles (6th Ave SE?) and clearly outline construction impacts to our neighborhood. Three homes will be within 100 feet of the wetland construction site. This will cause significant decrease in air quality, and intolerable levels of noise and vibration. This is not specifically addressed in the DSEIS.

*"Cumulative impacts could occur in the north tributary to Issaquah Creek as a result of construction activities for the Southeast Issaquah Bypass and the Park Pointe development. This small stream would receive runoff from much of the Southeast Issaquah Bypass construction site and nearly all of the Park Pointe construction site. The cumulative effects of sediment deposition in the stream could include reduction in channel conveyance capacity and an increase in local flooding along the stream corridor. If the two projects were constructed during the same time period, the cumulative impacts would probably be more pronounced." [DSEIS, 4-258].*

The DSEIS must address the impact of backup of water in the Lewis Lane tributary (north tributary) on our neighborhood. Specifically, the impacts on three houses along SE Kramer, adjacent to the Lewis Lane tributary, and the impact of water flow on the field (proposed wetland mitigation site) that currently functions to channel water into adjacent properties into Lewis Lane Creek.

19 SOCIAL IMPACTS DURING CONSTRUCTION ARE NOT ADEQUATELY ADDRESSED.

The demolition of neighbors' houses raises issues of release of materials that are hazardous to human health. According to the DSEIS:

*"The demolition, removal, and disposal of existing site residences and other structures during construction could release materials, including asbestos-containing materials (ACM) and lead paint that are hazardous to human health when distributed and/or removed inappropriately. Asbestos... is known to cause cancer and other respiratory problems. Lead... lead pipes... interior and exterior painted wood siding... plaster, can result in lead poisoning if inhaled or ingested during demolition." [DSEIS 4-250]*

The DSEIS relates these health hazardous solely to those working on the construction site of the SE Bypass. However, with the proximity of our dwellings to both the South A Alignment and South C Alignment construction areas, there needs to be careful evaluation of these materials, their potential effects, and what mitigations are necessary in order to keep our families safe. In the construction phase of the South A Alignment, the physical destruction of our friends', families' and neighbors' dwellings will occur. We will all be scarred emotionally, physically, and economically by this traumatic plundering of our neighborhood. In the construction section of the DSEIS under Social elements 4-2.4.4 the disruptions listed relate to local traffic patterns and noise and dust disturbances. These are important issues, however, they are traffic and health issues rather than social issues. The social elements of the DSEIS are entirely lacking. We call for a genuine discussion of impacts to social elements caused as a result of the construction phase of the SE Bypass.

20 PARK POINTE DEVELOPMENT WAS NOT GIVEN SPECIAL CONSIDERATION.

*"The proposed Park Pointe development project was given special consideration because of its potential location immediately east of the proposed Southeast Bypass project's central section." [DSEIS 4-257]*

17

17. As indicated in the preceding response to Comment #16, with mitigation Modified Alternative 5 is not expected to affect local flood levels. The proposed Park Pointe project will infiltrate all stormwater, eliminating discharge to the North Tributary.

18

18. Construction impacts on community cohesion/mobility, public services, utilities, recreation, transportation services and pedestrian and bicycle facilities are discussed and mitigation measures are proposed in Chapter 4 of the SDEIS.

The DSEIS states that the secondary and cumulative impacts of the proposed bypass includes special consideration of the Park Pointe development project. We see no such consideration given. We require discussion of Park Pointe's role in the secondary and cumulative impacts to our city's resources.

#### HISTORICAL AND ARCHAEOLOGICAL ELEMENTS

##### 21 THE DSEIS FAILS TO ACKNOWLEDGE THE HISTORIC AND GENERATIONAL LANDOWNERS LIVING IN THE AREA.

Much care seemed to be given to the synopsis of prehistoric, archaeological, and architectural history in the project area. Two homes which were built in 1944-48 and moved into the project area in 1971, were described in detail.

*"in addition to these criteria, the property must also maintain integrity of location, design, setting, materials, workmanship, feeling, and association."* [DSEIS, Cultural Resources Tech Report, p 22]

No detailed description was given of the many historic families living in the project areas. All 6 of the Build Alternatives negatively impact these valuable cultural resources. A house is a nice thing to look at and live in but the life of a community is contained in its people. The DSEIS fails to even acknowledge the contribution of the families, living in our neighborhood, who have helped to form Issaquah. Rather than being viewed as the Cultural Resources they are, they have been treated as non-entities.

The DSEIS failed to adequately address the subject of historic and generational landowners living in the project area. Our comments focus on our SE Lewis, Kramer Pl, 6th Avenue and Front Street neighborhoods (AKA Sycamore Subarea [DSEIS 4-158]). We trust that Dodge's and other families who may have similar concerns but live further to the North will present their cases separately.

The description of the primary land use in our neighborhood is:

*"single-family residential development that has occurred over the last twenty years."* [DSEIS 4-158]

This statement is incorrect. The DSEIS fails to account for historical and generational landowners, not just the architecture, but the people. It does not account for families who have lived here from 38 years to over a century. In our neighborhood, there are two family groups, occupying a total of 6 houses that fall into this category.

The Adair family are generational landowners who have lived on their land since 1903. They currently occupy 4 houses in the project area. Five generations have enjoyed and added their love and devotion to their lands. There are currently 3 generations living on the Adair family land. Under Alternatives 1, 3 and 5 (those which include the South A Alignment), two of those households, Michael and Kris Adair as well as Lonnie and Linda Adair Hjelm, would be removed.

The Nye family is another of the generational landowners. The Nyes moved into their house, at 620 SE Kramer Pl. on July 23, 1966. Jean Nye's brother Jack Cam built his house at 630 SE Kramer Pl. in 1973. After his death in 1993, Jean Nye's son bought and moved into his Uncles' house. Jean's granddaughter and great-grandson are living in a mother-in-law apartment in one of the houses. There are 4 generations living on the Nye family lands in two houses. One house and two families will be taken if the South A Alignment is constructed.

19. Specific references to proposed Park Pointe development were provided throughout the cumulative impacts analysis, including the discussions of hydrologic systems, floodplains, water quality, wetlands, vegetation, wildlife, fisheries, threatened and endangered species, land use, population, recreation, and visual quality. The cumulative impacts section of Chapter 3 of this Final EIS also includes consideration of the potential Park Pointe project. It should be noted that Park Pointe can be constructed as proposed without the Southeast Bypass.

20. Your comments have been noted and will be considered in the City's decision for this project. Historic settlement of Issaquah is addressed in the Cultural Resources technical report prepared for the SDEIS, and more briefly, in Chapter 3 of the SDEIS. Community cohesion is addressed in the SDEIS discussion of social impacts. Potential impacts on these elements under Alternative 5/Modified Alternative 5 also are discussed in Chapter 3 of this Final EIS.

*These families have chosen to live in close proximity to each other and will not willingly change that living arrangement!*

Alternatives 1, 3 and 5 designate six (6) neighborhood homes for removal. Three (3) of these are owned by Generational Landowners. The remaining households of these families will suffer a traumatic loss of community. Much needed support for aging parents will be *irreversibly and irretrievably lost*. This loss of support will make independent living far more challenging for the elderly.

*This constitutes a degradation of our quality of life and must be addressed by the DSEIS.*

20

22 THE DSEIS FAILS TO ACKNOWLEDGE THE IMPACTS TO OUR COMMUNITY COHESION AND MOBILITY.

Length of time alone is not the only measure of attachment to place. Our neighborhood is unique to the Issaquah area in many ways. As is nature's way, we have been drawn to this location rather than to some other community by the common values, needs and benefits offered by this location:

Here are a few of the things that we are blessed to enjoy:

- low population density
- song birds
- knowing the name of our neighbor's kids and pets
- bunnies
- nesting ducks
- the bear, and the deer who browse our large yards
- skies dark enough to see the stars (few lights)
- annual neighborhood picnics
- living near family
- spring frog concerts
- hang gliders
- hawks and eagles
- coyote
- wood peckers
- owls
- views of mountain tops
- raccoon
- bats

Our yards, serve as not only our children's play grounds, and visual and spiritual comfort, but sitting as we are in a wetland, they act as buffers for wildlife migrational corridors offering, food, rest, nesting areas and water.

These are just some of the amenities we value in this neighborhood. We host a delightful and healthy blend of backgrounds, countries of origin, and life styles. Great-grandparents, whom we view as a valuable cultural resource, babies, newlyweds, singles, and college students all live in our neighborhood. There are at least 5 different religions practiced by our families. We have 7 ethnic backgrounds and at least 4 languages spoken. We are not a planned community. We are a naturally integrated community attached to a place, the SE Sycamore Subarea.

21

*The "WINDSHIELD SURVEY" method of studying a neighborhood leaves room for much error.  
[DSEIS 4-159]*

The DSEIS states that "Community Cohesion and Mobility would not be impeded" [DSEIS 4-170, 171]. To the contrary, whereas alternatives 1,3 and 5 would effectively obliterate our neighborhood, alternatives 2,4 and 6 will serve to cut off the Sycamore Subarea from the rest of Issaquah [DSEIS 4- 244, 246]. Within this segment of the project area there will be "mobility impediments and congestion" which will decrease the connectivity



between this neighborhood and nearly all other segments of the community including businesses. (Please see our comments on Traffic).

*The families remaining in our neighborhood if Alternative 1, 3 or 5 are chosen, will suffer a loss of community. They have expressed strong emotional distress at having to witness the homes of friends and family members being demolished. These families will instantly lose a great portion of their chosen community,*

23 THE DSEIS DOES NOT ADEQUATELY ADDRESS THE IMPACTS ON THOSE LIVING WITHIN 300FT FROM THE PROPOSED PROJECT.

The DSEIS did not honestly or adequately address any of the Construction or Long-Term impacts nor possible mitigations associated with living in the proximity of within 300ft from both the construction zone and/or a 4-7 lane road. This is not acceptable. We request that you thoroughly review and research all areas which will potentially affect the people remaining in our neighborhood if any build alternative is chosen.

A Air Quality (see also the Air Quality section of this report)

*"fugitive dust from construction activities shall not be injurious to human health, plants and animals or property, and shall not unreasonably interfere with the enjoyment of life and property." [DSEIS p. 4-224]*

- There are children living in the project area. Children's outside activities will need to be severely limited due to emissions, particulate, and dust.
- Because it is dark and cloudy many months of the year in our area, it is recommended that people get outside during the summer.
- Many people have chosen to live in our neighborhood because of the large yards. For mothers with young children it is attractive to have a safe, convenient play area to be able to take their children outside to get the exercise necessary for proper growth and well being. The pollution caused by the proposed bypass will severely limit this option for those living within 300ft from the project.
- Children breath deeper and faster when at play.
- It is known that diesel exhaust particles induce acute asthma flares.
- During the construction phase of this project it will likely be unwise to allow children to play outside in the warmer months.
- Inside air quality for those near the proposed bypass will diminish, especially during construction.

B Noise (see also the Noise section of this report)

*"Prolonged exposure to very high levels of environmental noise directly affects human health by causing the disease of hearing loss... Although current scientific evidence is not conclusive, noise is suspected of causing or aggravating other diseases. Elevated background noise levels can interfere*

21

21. As noted in the SDEIS, Census information and city data, public outreach, and local surveys did not identify minority or low income populations that would be displaced by the proposed project. The SDEIS acknowledges that the existing setting would be changed and that the local neighborhood would become more urban in character. Although under Modified Alternative 5, up to eight homes would be displaced, the proposed project is expected to improve mobility and would allow neighborhood connections to function in a similar manner as now occurs.

22

22. See responses to comments 11 and 15 of this letter.

*with speech recognition. Environmental noise indirectly affects human welfare by interfering with sleep, thought, and conversation." [DSEIS Technical Report, p 11]*

- Sleeping patterns will be impacted.
- Children's sleep will be more impacted than adults. Especially if a permit is sought to extend the hours of construction. [DSEIS p 4-8]
- Noise pollution will interfere with the 3-5 hours of homework most children are expected to do each night.
- In assessing whether the sound pollution during this project would be in the acceptable range, the DSEIS compared the noise levels to each other, but did not study the full range of multiple noise sources in combination.
- If any of the build options are chosen, the sound walls that are designated in the DSEIS will create an amphitheater effect for our neighborhood.

We demand that the DSEIS include a thorough and honest discussion of the impacts to the historic families and community as well as address the health, safety, and quality of life issues for those living in close proximity to the proposed project.

#### SEISMIC CONCERNS

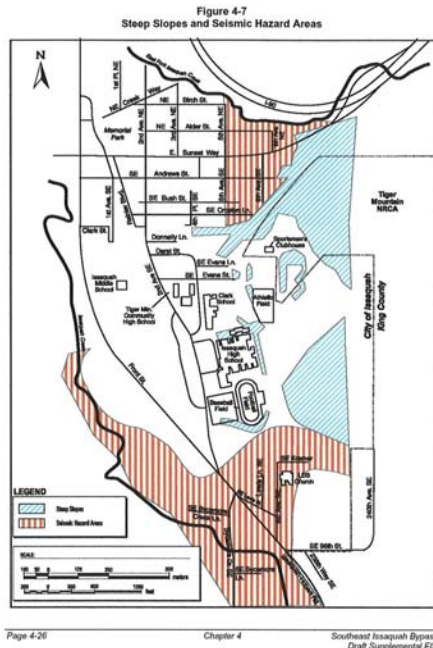
*"During liquefaction, soil strength is dramatically reduced as the soil is subjected to vibration or shaking... Loose, saturated sand and silt is particularly susceptible to liquefaction." [DSEIS 4-27]*

*"No specific impacts related to seismic hazard are expected during construction other than impacts related to the design of the road for mitigation of seismic hazards." [DSEIS 4-228]*

**Table 4-30**  
**Summary of Impacts Related to Earth Resources during Construction**  
(percent of total project area affected)

Alternative	Steep Slopes	Seismic Hazards	Coal Mine Hazards	Landslide Hazards	Erosion Hazards
Alternative 1	Yes (10)	Yes (32)	No (0)	Yes (0)	Yes (14)
Alternative 2	Yes (10)	Yes (9)	No (0)	Yes (0)	Yes (12)
Alternative 3	Yes (7)	Yes (33)	No (0)	No (0)	Yes (16)
Alternative 4	Yes (9)	Yes (9)	No (0)	No (0)	Yes (12)
Alternative 5	Yes (9)	Yes (32)	No (0)	Yes (0)	Yes (14)
Alternative 6	Yes (9)	Yes (9)	No (0)	Yes (0)	Yes (16)
Alternative 7 (No Action)	No (0)	No (0)	No (0)	No (0)	No (0)

[DSEIS 4-228]



[DSEIS 4-26 Figure 4-7] which documents our neighborhood as a Seismic Hazard Area.

24 THE DSEIS DOES NOT ADEQUATELY ADDRESS THE SEISMIC CONCERNS OF THE SURROUNDING COMMUNITY.

Our neighborhood is located on a narrow valley floor, sitting on wetland and wetland buffer, our soil is composed of "Organic silt, thin layers of peat, and sand." [Biological Assessment p.28 table 5.2] The DSEIS indicates an elevated seismic hazard risk due in part to the jello like consistency of the soil. It wiggles and jiggles more easily than other soil compositions. K. Troost RPG of the UW Department of Earth and Space Sciences had this to say when we called. "We can't offer any specific consulting advice, however, vibrations can indeed be more substantial in peaty and organic soils than in many other soil types."

We know from the 1997 widening of Front St. South that the vibrations from heavy machinery, compacting equipment and jack hammers caused damage to homes in our neighborhood. There were double pane windows which broke the seals, and cracked walls as far as 800 ft. away from the construction site. One family has video

23. The SE Bypass project will cross a seismic hazard area along the south end of the alignment. The seismic hazards that exist in this area are not particularly different from other seismic hazard areas within Issaquah that are developed as urban areas. Design of the roadway across the seismic hazard area will include standard design and construction methods in accordance with accepted engineering standards for this type of construction. In addition, other structures, such as retaining walls at the north end of the SE Bypass, which is not considered a seismic hazard area, will be designed and constructed using accepted engineering standards that include seismic loading during earthquake events.

Also, we agree with the statement by K. Troost of the University of Washington Department of Earth and Space Sciences in that "vibrations can indeed be more substantial in peaty and organic soils than in many other soil types." Vibration from trucks and buses passing by on a roadway is generally not noticeable at distances greater than 5 or 10 feet from the edge of the travelway. In highly transmissive soils, such as organic peat, the distance of noticeable vibration could increase to between 10 and 20 feet from the roadway. During construction, certain activities, including pile driving and the use of vibratory rollers, can cause damage to fragile structures, such as un-reinforced masonry buildings. The potential for damage to structures in good condition is low. Because the soil transmissivity is higher than average, piles should not be driven within 100 feet of existing structures or 200 feet of fragile historic structures. Vibratory or augured pile driving methods should be used if piles are needed in these areas. Likewise, vibratory rollers also should not be used within 100 feet of existing structures.

footage of loud work being done at 7:00AM on a Sunday. That same video tape shows their daughter waking up crying, think there was an earthquake. A number of adults reported feeling unsettled much of the time and wondering if we were having earthquakes. We were! We were having man-made quakes. The dust that summer was terrible.

#### PROPERTY VALUES

Due to noise, air pollution, traffic, degraded views, and seismic activity during and after construction of the proposed bypass, our neighborhood will see a reduction in property values.

- 25 THE DSEIS DOES NOT ADEQUATELY ADDRESS OR PROPOSE MITIGATION FOR DECLINING PROPERTY VALUES THAT WILL RESULT FROM THE CONSTRUCTION AND USE OF THE PROPOSED BYPASS.

If anyone found that they could not remain in the project area and needed to sell it would be made considerably more difficult under any of the build alternative construction periods. Ultimately, the scenic views, which we regard so highly, will be irretrievable and irreversible damaged. Views of trees will be exchanged for views of cement sound barrier walls. Song bird calls will give way to incessant traffic hum, grinding breaks, and glaring highway lights will obscure the stars. Yes, we would be located in a neighborhood that has "easy access to freeways." If we had wanted to live in an area like that we would already be there. We are where we are by choice.

How then can the DSEIS say the following, concerning our property values?

*"Adverse property value impact would not be expected during the construction period, so no mitigation measures are recommended. However, property owners and real estate agents in the Issaquah area should be provided with information that could be used to advise prospective property sellers or property buyers of the planned road improvements, constructions activities, and duration of construction. To ensure that full disclosure occurs for any potential real estate transactions during construction." [DSEIS 4-249]*

Our lowered property values constitute a diminishment of our quality of life!

#### FLOODING (SOUTH A)

These comments request that Alternatives 1, 3, and 5 be removed from consideration in the Final SEIS based on the fourth full paragraph on Page 4-58 of the June 2004 DSEIS, which states:

*"Because Alternatives 1, 3, and 5 would encroach into the 100-year floodplain... they are not consistent with FHWA regulations that require new road construction to avoid floodplain encroachments unless there is no practicable alternative (23 CFR 650.111 and 650.113). For the Southeast Issaquah Bypass project, there are 3 build alternatives (Alternatives 2, 4, and 6) that would not impact the 100-year floodplain and could be selected as the preferred alternative." [DSEIS 4-58]*

The following comments are in response to both the June 2004 DSEIS and the SE Issaquah Neighborhood Alliance

24

24. The DSEIS acknowledges that the proposed project may have an influence on local property values. Furthermore, it indicates that the project would only be one of several factors that may determine the market value of local properties. Market values are the product of individual preferences and economic conditions that may differ from one person to another and may vary over a period of time. During construction, some individual buyers may avoid the project area, while others may be attracted by longer-term prospects associated with mobility improvements provided by the new roadway. Because the proposed project would represent only one consideration in a decision to purchase property in the project area, it is not expected to greatly influence such decisions.

comments to the June 2000 DEIS. These original comments are included in pages 152 through 161 of the Comment Letters of the June 2004 DSEIS. Numbered comments are from our August 2000 comment letter and can be found on page 152 of the Comment Letters document.

- 26 THE DOCUMENTATION WHICH SERVES AS THE BASIS FOR DETERMINING THE FLOODPLAIN LIMITS IN THE AREA OF THE SOUTH A ALIGNMENT APPEAR TO BE VERY PRELIMINARY... [AUGUST 2000 COMMENT LETTER, ITEM 1]

The June 2004 Draft Supplemental Environmental Impact Statement appears to have effectively responded to this comment, particularly the incorporation of the "Issaquah Creek Flood Insurance Study Revisions" prepared by the Montgomery Water Group in 2002. See DSEIS page 4-54 and Figure 4-13 on Page 4-55.

A comparison of the June 2000 DEIS and the June 2004 DSEIS found that the June 2000 DEIS South A alignment with 2 lanes is estimated to fill approximately 4.5 acre-feet of floodplain, whereas the June 2004 DSEIS has reduced that to 3.2 acre-feet, even though the revised South A alignment is 4 lanes wide [DSEIS 4-58]. How can the wider South A alignment fill less floodplain?

- 27 THE DEIS DOES NOT DEMONSTRATE AN UNDERSTANDING OF THE PATTERNS OF FLOW DURING A FLOOD... [AUGUST 2000 COMMENT LETTER, ITEM 2]

The 2004 DSEIS does not adequately respond to this comment. The 2004 DSEIS does incorporate information on the 4 documented floods (January 1986, January 1990, November 1990, and February 1996), including the estimated return periods into the report [DSEIS 4-57]. The report accurately stated that "During the storm events of 1990, the main stem of Issaquah creek overtopped Issaquah-Hobart Road and flooded the low area at the vicinity of 6th Avenue Southeast." However, this report failed to note that the January 1986 and February 1996 storm events also overtopped the Issaquah-Hobart Road at the same location, one of which had a 12 year return period. This overtopping is documented in the August 14, 2000 comments. These comments request that Final SEIS document the overtopping of Issaquah-Hobart Road at SE 6th Avenue for all four flood events.

This flow of floodwater over Issaquah-Hobart Road at 6th Ave SE is critical to understanding the flow patterns in the area, and strongly indicate that floodwaters will need a means to fill the floodplain east of the South A alignment in this vicinity. The 2004 DSEIS on Figures S-2, S-4, and S-6 (pages S-7, S-11, and S-15 respectively)

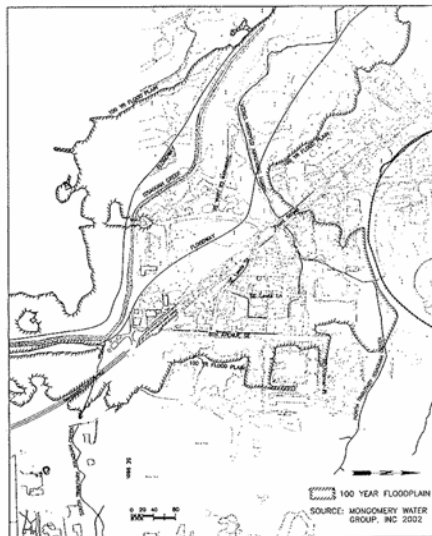


Figure 4-13: Issaquah Creek 100 Year Floodplain

Southeast Issaquah Bypass  
and Supplemental EIS

Chapter 4

Page 4-55

25

25. The finish road grade would not be higher than that of the adjacent areas in most of the project area. Any filling of floodplain area under Alternative 5/Modified Alternative 5 would be mitigated as described in the Final EIS and the City's Concurrence Point 3 Packet. The City is aware of flooding issues in the area, and will design the project to avoid making flooding worse. While floodwaters do cross over Front Street South, historical flooding along 6<sup>th</sup> Avenue SE was also caused by blockage of the South Tributary culvert under Issaquah-Hobart, causing South Tributary floodwater to flow north across SE 96<sup>th</sup> Street to 6<sup>th</sup> Avenue SE. This culvert was replaced in 2004 with a large box culvert, thereby eliminating this flooding source. Floodplain fill for the project will occur mainly in the area of the proposed bridge. As the proposed roadway reaches Front Street South it will meet existing grade, requiring little or no floodplain fill. Because the southern end of the SE Bypass and Front Street South will not be raised, there will be no alteration of flooding patterns in this area. Where fill is proposed, flooding is caused primarily by backwater entering from the North Tributary and, thus, the potential that the proposed road could alter flood patterns is low.

show that all floodwaters will backfill into this portion of the floodplain under the bridge that crosses the North Tributary. This will likely result in higher flood elevations for those areas west of the South A alignment. There is a clear statement indicating that the DSEIS doesn't understand the nature of flooding and conveyance patterns. In the second full paragraph on page 4-59, the detention ponds for mitigation are assumed to function based on the erroneous premise that "flooding currently occurs from water backing up into the project area from the main stem of Issaquah Creek."

These comments request that the Final SEIS identify how floodwaters from 10 year return period floods will be conveyed under or over the South A alignment and the Issaquah-Hobart Road somewhere between the South Tributary and 6th Ave SE.

- 28 THE MITIGATION MEASURES DESCRIBED FOR BOTH THE SOUTH A ALIGNMENT [sic] ARE NOT SUFFICIENTLY DEVELOPED... [AUGUST 2000 COMMENT LETTER, ITEM 3]

The 2004 DSEIS has substantially revised the mitigation measures for the South A alignment. The following comments apply to the revised mitigation measures.

South ponds A-2, A-3 and A-4 identified on Figures S-2, S-4, and S-6, and South Pond C-3 in Figures S-3, S-5, and S-7 appear to be within the 100 year floodplain as identified in Figure 4-13. This suggests that these ponds, intended to mitigate for surface runoff, will displace floodwaters and therefore not meet the intended purpose. The explanation in the second full paragraph on page 4-59 concludes these ponds "would not displace any floodplain volume" but the reasoning for this conclusion is not clear. *These comments request that the Final SEIS clearly explain how detention ponds within the 100 year floodplain can store surface runoff without displacing floodplain volume.*

The first full paragraph on Page 4-58 indicates that past upstream development has "increased the flooding problems along the lower reaches of Issaquah Creek, including the Southeast Issaquah Bypass project area."

Given this relationship between upstream development and flooding in the project area, these comments request that the Final SEIS estimate the increased flooding potential due to increased development as a consequence of the construction of the Southeast Issaquah Bypass.

- 29 THE DEIS DOES NOT PROVIDE SUFFICIENT INFORMATION TO DETERMINE THAT THE PROJECT MEETS THE ISSAQUAH CRITICAL AREAS STANDARDS... [AUGUST 2000 COMMENT LETTER, ITEM 4]

The 2004 DSEIS currently fails to meet the Issaquah Critical Areas Standards in Chapter 18.10 of the Issaquah Municipal Code. Of particular emphasis is Section 18.10.530, which identifies that there can be no reduction in floodplain conveyance and that compensatory storage is required. Conveyance of floodwaters is not met because there is no identified means to convey the 12 year return period floodwaters that move across Front Street at 6th Avenue SE and northward along 6th Avenue. Compensatory storage is not met because several storm water detention ponds are located within the 100 year floodplain. These ponds cannot serve simultaneously to store surface runoff and floodwaters.

- 30 THE AFFECTS OF THE PROJECT ON FISH HABITAT AND OTHER ENVIRONMENTAL ISSUES DURING CONSTRUCTION OF THE PROJECT DURING POSSIBLE FLOOD EVENTS IS NOT ADDRESSED. [AUGUST 2000 COMMENT LETTER ITEM 5]

26

26. Conveyance and flood flow for the 10-year storms was described by neighbors who witnessed the flow which reasonably fit the likely conveyance routing. No change in conveyance from existing conditions is proposed by this project.

27

27. No displacement of floodplain storage is proposed as a result of the water quality treatment pond located at C-3. This is because the top of the pond would be located at existing grade, and the bottom would be excavated to provide additional water quality treatment. During flood storm events, the pond would be inundated.

28

28. The South Pond S-2 will partially meet the detention pond storage requirement, with the remaining provided at an offsite compensatory detention pond South Pond S-3.

The 2004 DSEIS identifies that the greatest potential for erosion from cleared areas and the consequent transport of sediment, and indicates that this issue would be addressed by developing an Erosion and Sediment Control Plan in accordance with the Stormwater Management Manual for Western Washington (see page 4-233). This Sediment Control Plan is not adequately specific to the construction issue for the South A alignment, which will require construction within a 12 year floodplain and areas that serve as flood conveyance during these events.

These comments request that the Final SEIS specifically address how construction in these circumstances will be monitored and controlled to prevent erosion and transportation of sediment outside the project during a 10 year to 100 year flood event.

#### FLOODING (SOUTH C)

- 31 THE DSEIS DOES NOT ADDRESS FLOODING IMPACTS OF THE SOUTH C ALIGNMENT ON THE SE ISSAQUAH NEIGHBORHOOD ALLIANCE.

*"The project area is located on the eastern edge of the lower Issaquah valley aquifer, which supplies water to most of Issaquah and to development on the East Lake Sammamish plateau to the north" [DSEIS, p 3-2].*

*"Under the Washington Administrative Code, all of the water bodies in the project area are designated as Class A waters (excellent water quality)" [DSEIS, Technical Appendices, pp 17-18].*

Alignment C involves the creation of multiple storm, retention, and infiltration ponds. As mentioned previously, the water bodies in this area are of excellent quality. However, according to the Issaquah Press [7-7-04, p. A2], larvicide may have to be added which will affect the quality of our drinking water. "The city has a permit from the state Department of Ecology to apply larvicide on stormwater ponds, detention ponds and stormwater conveyance systems... The products [types of larvicide] are not approved for drinking water supplies."

[Tech. App., p 26, Figure 6]

Our neighborhood borders Wetland GW, encompasses Wetland VW and is in close proximity to Wetland HS [Figure 6, Tech. App.,

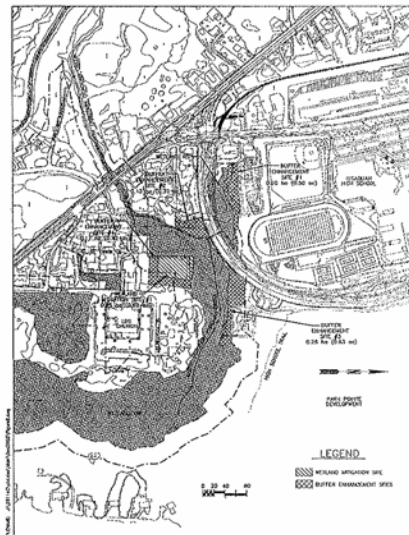


Figure 6  
Proposed Wetland Mitigation for the South C Alignment of the Southeast Issaquah Bypass project

29. The City of Issaquah would provide construction management and inspection services to assure compliance with the project specific Stormwater Pollution Prevention Plan (SWPPP).

30. A larvicide is being used by the City consistent with the approved Department of Health strategy to mitigate potential mosquito-borne health issues associated with the West Nile Virus. This larvicide (Bti) is a natural bacterium that is considered safe by the Department of Ecology. If applied to surface waters, there is no chance that it will enter the groundwater drinking water aquifer because natural attenuation by subsurface soils will very effectively remove any contaminants.

Based on mapping for the Wellhead Protection Plan, the Lewis Lane Tributary (North Tributary) area is not within the primary recharge area of the Lower Issaquah Valley aquifer because fine grain alluvial soils in the area have poor infiltration potential. Portions of the project that do overly the aquifer (north of Lewis Lane Tributary) will include stormwater treatment and infiltration to the maximum extent feasible to minimize impacts to the aquifer and stream base flows.

Flooding of this area is due to high flows in Issaquah Creek, not local drainage problems. Nevertheless, based on project documentation, Park Pointe will mitigate stormwater impacts by infiltrating all stormwater up to the 100-year event. The SE Bypass will provide very similar mitigation for stormwater runoff, resulting in minimal impact to the North Tributary and no increased flooding.

p 26]. "The north tributary to Issaquah Creek (also known as the Lewis Lane Tributary)" lies just north of our neighborhood, close to three homes on SE Kramer Pl.

*"This small stream should conservatively be considered as Class 2 with salmonids... The stream originates as groundwater seeping out of the hillside east of the project corridor, near the base of the hill... There are no recorded flow data or modeled flow estimates for this stream" [DSEIS 4-40]. "Flooding has historically occurred in Issaquah Creek and its tributaries" [DSEIS 4-43].*

The DSEIS must include baseline data since the Lewis Lane tributary (north tributary) is a critical part of the Issaquah valley recharge area that is vital for our drinking water. In addition, since it flows into the Issaquah Creek, it assists in sustaining endangered fish habitat.

*"The recharge area for the lower Issaquah valley aquifer is extensive, covering much of the lower Issaquah Creek valley and uplands on the Lake Tradition plateau... Most of the Southeast Issaquah Bypass project site lies within the mapped recharge area of the aquifer... The proposed Southeast Issaquah Bypass corridor lies within the drainage basin of the Issaquah Creek" [DSEIS 4-36, 4-37].*

Currently, the forested east slope of the proposed Park Pointe development, large wetlands (GW and HS) assist in naturally filtering water and controlling large amount during heavy rains. By increasing impervious surfaces of the South C alignment, the proposed Park Pointe development and the parking lot for trailhead parking decreases this fragile area's ability to handle large amounts of water and will lead to increased flooding in our neighborhood.

"None of the build alternatives would disrupt the movement of flow out of the large forested wetland system in the south end of the project corridor" [DSEIS 4-47]. Building "up to 660 single and multi-family housing units" [DSEIS 4-257] will increase impervious surface and change/disrupt water flow out of the hillside. "Generally, where new concrete and pavement is replacing natural conditions, the amount of water that can seep down and recharge the aquifer is being reduced" [DSEIS 3-2].

"The Park Pointe development proposes to discharge its runoff to an infiltration system with overflow to the north tributary of the Issaquah Creek. This development proposal also includes collecting and bypassing off-site (upslope, east) seepage and runoff for direct discharge to the north tributary" [DSEIS 4-258]. During heavy rains, a frequent occurrence in the winter in our valley, the runoff into north tributary/Lewis Lane tributary will be great and increase flooding in our neighborhood.

According to Figure 4-7 and Figure 4-8 [DSEIS 4-26, 4-28], our neighborhood is located in a seismic hazard area, borders a steep slope and landslide hazard area in the proposed Park Pointe development. The increased sediment caused by a minor or major landslide will contribute to flooding in our neighborhood and damage fish habitat critical in the Issaquah Creek. Mitigations in the Issaquah Highlands development failed and caused a landslide that closed access to I-90 west from the Sunset Interchange and dumped increased sediment into the Issaquah Creek.

Currently, during the winter months (flood season) water flows southwest from the field into the two adjacent properties, 1065 6th Ave SE and 1101 Lewis Lane SE. With heavy rains, this runoff becomes a small stream flowing across 6th Ave property into Lewis Lane Creek that flows adjacent to 6 homes. Potential flooding issues have not been studied. Removing and replacing soil in Mitigation Site #1 and replanting to create a wetland may significantly increase flooding in our neighborhood.

Performance Standards for Wetland Creation only address sustenance of new plantings for the wetland, not



SE Issaquah Neighborhood Alliance - DSEIS Comments  
July 27, 2004

flooding of our neighborhood. "Tree and shrub planting should cover a minimum of 20 percent of the ground 1 year after planting, 30 percent after 2 years, 40 percent after 3 years, and 60 percent after 5 years" [Tech. App. p 23]. This is not acceptable to take 100% of existing plant coverage in Wetland Mitigation Site #1 and have a potential of only 60 percent coverage after five years. This will significantly impact flooding in our neighborhood.

For maintenance and monitoring, "the City of Issaquah or its representative will be responsible for monitoring the sites once a year during the peak growing season (May to August)" [Tech. App. p 33]. Under Water Regime, "monitoring of water levels in the wetland creation site will provide information on whether the hydrologic regime in the wetland can support hydrophytic vegetation" [Tech. App. p 34]. This does not measure water flow changes or flooding impacts to our neighborhood.

#### CONCLUSION

This bypass issue has been like an ever-darkening cloud over our lives for up to 12 years. We have put much of our lives on hold while our taxes have been spent on faulty studies. We have postponed everything from making much needed, and desired improvements to our properties, to having children. Our family members, young and old, are anxious hearing discussions about the potential affects of all of the proposed build options.

As a community, we call for an end to needless expenditures of our tax dollars. We do not want to pay with our money, emotions or the quality of our lives, for a road project which will yield so few benefits for the local community. Do not waste any more time or money on Alternatives 1, 2, 3, 4, 5, or 6. They do not serve the purpose of the formal Needs and Purpose Statement, nor do they serve the interests of the local community.

Rather, please make the sensible choice to move on immediately from the invasive measures set forth in these six options and explore the No Build Option. Understanding that we are not suggesting that "No Action" be taken. Rather put the effort and money toward the variety of measures which will truly lead to realizing an improvement of the traffic in Issaquah and will have a less damaging effect on our community.

- SE Issaquah Neighborhood Alliance (see attached signatures)

30

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31. Your comments have been noted and will be considered in the City's decision for this project.

Comments to SE Issaquah Bypass Draft Supplemental Environmental Impact Statement  
July 2004

Signature Page

Signature	Printed Name	Address
	VIRGINIA CHONG	1106 LEWIS LANE S.E.
	ROXANNA TORRES	1106 LEWIS LN SE
	Steve Ellingson	8714-182 PL SW 98026
	GEORGE CONSTACH	1101 LEWIS LANE SE
	Johanna Roth	1101 Lewis Lane SE
	Kristine G. Adair	1276 Front St. S. 98027
	LISA BEHRINGER	550 SE Lewis St. 98027
	ADAM BEHRINGER	550 SE LEWIS ST
	Jane H. Ison	1103 Lewis Ln SE
	Bill Werner	1104 Lewis Ln. SE
	AVELINA LEPSKI	1109 LEWIS LN SE.
	Margaret Adair Klinkham	1275 Front St. S
	FRANK F. KLINKHAM	1275 Front St. S
	Meghan Adair	18813 SE Mt. Valley Rd.
	Alastair Brewer	1065 6 <sup>th</sup> Ave SE 98027
	Elizabeth Brewer	1065 6 <sup>th</sup> Ave SE 98027
	Jean G. Mye	620 SE Kramer Place 98027
	Krista L. Kilmer	620 SE Kramer Pl.
	Tadj J. Kilmer	620 SE Kramer Pl.
	Donzella B. Kilmer	690 SE Kramer Pl.

Comments to SE Issaquah Bypass Draft Supplemental Environmental Impact Statement  
July, 2004

Signature Page

Signature	Printed Name	Address
	Peggy L. Bateman	690 SE Kramer Pl.
	JEFFREY G. NYE	630 SE KRAMER PL.
	MICHAEL P. ADAIR	1276 FRONT ST. S. ISSAQUAH 98027
	LINDA HIELM	1245-6th S.E., Issaquah 98027
	Jim Bonner	530 SE LEWIS ST
	Gaylon Bonner	530 SE LEWIS ST ISS 98027
	Michelle Jones	1105 Lewis St SE 98027
	Erin Brown	580 SE Lewis St 98027
	Brian Miller	580 SE Lewis St 98027
	David Bennett	1105 Lewis Lane SE 98027
	Lillian Hielm	1245 6th SE Issaquah 98027

Daniel P. Lamanuzzi

940 2<sup>nd</sup> Ave SE  
Issaquah South East Bypass

Issaquah, WA 98027

### "Very" Brief Summary of Issues and Discrepancies

Thank you for allowing me to speak.  
My name is Dan Lamanuzzi

The following is a very brief summary of only two concerns from an approximate 30 page comment report I will be submitting before July 30<sup>th</sup>.

**I Believe that the Supplemental EIS report Fails in many areas, two of which are;**

- ☒ **NOISE Issue, and**
- ☒ **SAFETY Issues**

☒ **The Report FAILS** to properly assess and address **NOISE** issues related to the South C Alignment .... And its data is simply in-accurate.

- It improperly assesses the impact of forcing ~2200 vehicles through the proposed South C intersection @ 2<sup>nd</sup> Ave & Front St which would be directly adjacent to existing residences (within approximately 30 feet of bedroom windows) .. Contrary to what the report claims, the noise levels would exceed the allowable dBA limits.
- I have personally performed noise level measurements using a calibrated noise level meter and I have also modeled the predictive noise levels using an internationally accepted Traffic Noise Modeling Tool.
- My modeled values are for 10 meters from the curbside, which is the approximate distance from my bedroom window to the proposed curbside. Both my measured & modeled values correlate very well ... where-as, the EIS values do not. Note that the modeled values in all cases are conservatively lower compared to actual measured values.

@ Peak Traffic Hours	Location	DanLam Modeled	DanLam Measured	EIS Modeled	EIS Measured	Increase (dBA) (over present)
October 2002	2 <sup>nd</sup> & Front			62 <sup>z</sup>	68 <sup>1</sup>	
July 2004	2 <sup>nd</sup> & Front	71.3	71.9			
July 2004	My front door	54.2	57.1			
July 2004	My bedroom window		48.0			
For 2005 w/South C	My bedroom window	74.6				>26
For 2030 w/South C	My bedroom window	76.2		66		>28

1) The EIS report states that this value was used for calibration.  
2) The EIS report states that this model is to the nearest residence.

- Note that the EIS actual measured value from October of 2002 is 68 dBA at the intersection of 2<sup>nd</sup> & Front Street, yet the EIS predictive model for the year 2030 is only 66 dBA (conveniently 1 dBA below the maximum allowable level). With the forced increased concentration of traffic through this intersection, the EIS model is CLEARLY inaccurate.
- My modeled values for the years 2005 and 2030 are far more realist and accurate ... and they demonstrate that allowable limits will be EXCEEDED.

C:\Documents and Settings\danielam\Back-Up Files\My Documents\SE Bypass\SE Bypass - Issues - 3 Minute Summary 071504.doc  
Page 1 of 3  
Lamanuzzi

1. The primary comment presented is that the SE Bypass noise analysis did not present noise levels that would exceed the allowable noise limits in the area of the commenter's home, along the proposed South C Alignment. As presented in the comment, the 68 dBA noise level was used for noise model calibration. The footnote to Table 4-4 found on Page 4-11 of the SDEIS states that the 68 dBA noise measurement was taken along the edge of roadway and was used for calibration only. Therefore, this is not a location where noise level impacts are predicted and should not be used as such.

The modeled noise location that is most similar to the commenter's "front door" measurements was Modeled Site M, included in the DSEIS. Noise levels at Site M were predicted to be 55 dBA which is within 2 dBA of both the commenter's "July 2004 Measured and Modeled" noise levels of 54 dBA, and 57 dBA respectively.

It appears that the commenter used the 2nd Avenue and Front Street location to predict noise level impacts for the South C Alignment, instead of relying on an outdoor use location as required by FHWA and WSDOT noise analysis and abatement guidance. For two outdoor use locations in the area, future modeled predicted results are 66 and 68 dBA, with the South C Alignment.

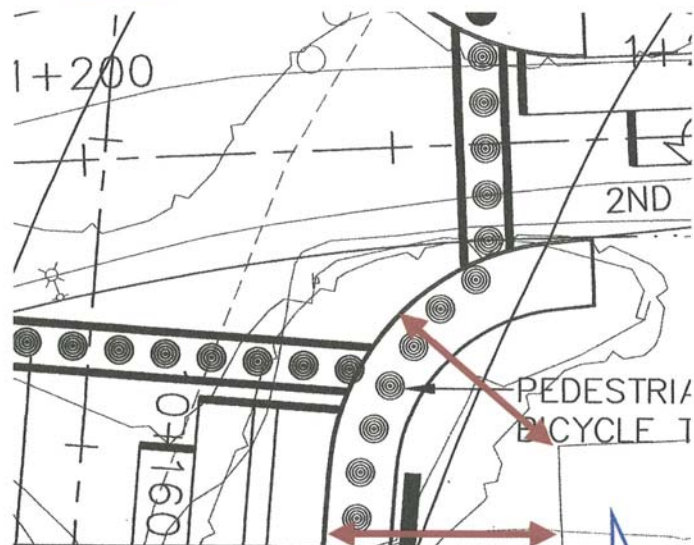
The comment continues by indicating that the modeled noise level at the location nearest the commenter's home, 66 dBA, was "conveniently 1 dBA below the maximum allowable level", which is incorrect. 66 dBA is at the WSDOT noise impact level and presented as such in the DSEIS in June 2004. Because noise levels at residences in this area were at impact criteria levels, noise mitigation was evaluated in the area with Noise Wall 3 (findings presented on Page 4-17 SDEIS, June 2004). The section of Noise Wall 3 considered for the area in question was determined as not meeting WSDOT Reasonableness Criteria, based on the number of residences benefited, weighed against the cost of constructing the noise wall.

In response to an additional comment, large vehicles were included in the noise modeling and analysis. Medium-sized trucks and large-sized trucks accounted for 4% of the total traffic volume along the South C alignment and Issaquah-Hobart Road to Front Street.

In response to comments regarding the general accuracy of the noise analysis, PB reviewed both the noise models and the analysis prepared for all of the alternatives evaluated in the DSEIS. No inaccuracies in this analysis were identified during the review. The issues that were highlighted in the Lamanuzzi comment letter are explained in the response presented above, and were not found to invalidate the previous noise modeling or analysis.

**"Very" Brief Summary of Issues and Discrepancies**

- Most of the homes in the proposed new intersection area do not have air-conditioning and it is normal and typical to open windows at night ... **the increased noise would simply make these homes unlivable ...**



*Southeast Issaquah Bypass  
Draft Supplemental EIS*

Chapter 5

Bedrooms ~30 feet  
from Curbside

In addition;

- There is no discussion of increased noise levels from additional heavy trucks—which were previously barred from Front Street, which would now use the Bypass.
- There is no discussion of monitoring noise to ensure that sound is not increased beyond a fixed allowable amount without mitigation required to reduce the noise to allowable range.
- The report states that Sound barrier walls cost too much and therefore will not be considered, yet the cost of litigation will far exceed the cost of the sound barriers.

1



"Very" Brief Summary of Issues and DiscrepanciesSAFETY:

**D** The Report also **FAILS** because ... It does not address or assess the significant increase in **Safety Issues** directly related to the predictably large increase in traffic accidents at the intersection nearest to Issaquah High School.

- It can be predicted<sup>(1)</sup> that with the South "C" Alignment, the accident rate at the proposed intersection closest to the High School<sup>(2)</sup> will have an increased accident rate of as much as 20 times the current accident rate.
- With the South "A" Alignment, it can be predicted that the accident rate at the intersection closest to the High School<sup>(2)</sup> will have a rate of as much as 2/3rds lower than the South C Alignment.
- The South C Alignment places both parents and students at an unacceptable higher risk.

1) Based on Table 12 of the Technical Report and the traffic model predictions of figures 18, 19, and 20 ...

2) @ 2<sup>nd</sup> Ave and Front Street ...

Thank you,

  
Daniel P. Lamanuzzi

July 15, 2004  
Date

2

2.. Modified Alternative, with the South A alignment, was chosen as the preferred alternative because it is the only build alternative that has impacts that can be effectively mitigated. The other build alternatives considered in the SDEIS, including those with the South C alignment, would have impacts considered unacceptable. The South A alignment would avoid the intersection with 2<sup>nd</sup> Avenue and potential safety concerns associated with that alignment.

**Pam Fox**

**From:** Carolyn Sygitowicz  
**Sent:** Monday, July 19, 2004 10:42 AM  
**To:** Pam Fox  
**Subject:** FW: bypass funding

-----Original Message-----

**From:** Sujensen@aol.com [mailto:Sujensen@aol.com]  
**Sent:** Friday, July 16, 2004 6:43 AM  
**To:** Nancy Davidson; Fred Butler; Bill Conley; Joe Forkner; RusselJ@ci.issaquah.wa.us; David Kappler; Issaquah Press; Issaquah Press; Issaquah Press; dberto@isspress.com; MAYOR  
**Subject:** bypass funding

Will local businesses and residents be driven out of Issaquah by increased taxes to fund the bypass?

Susan Jensen  
(25 year Issaquah resident)  
Issaquah Bed and Breakfast  
140 Sixth Avenue SE  
Issaquah, WA 98027  
425-246-8382  
sujensen@aol.com

1

1. Funding for the proposed project has not been determined and would likely come from federal, state and local sources. The City's share of the total construction cost will likely be in the range of 14-20%, depending on which grants are applied for.

7/20/2004

July 30, 2004

Bob Brock  
Public Works Director  
City of Issaquah

RECEIVED  
JUL 30 2004  
PUBLIC WORKS ENG.

Bob:

As a future resident of the Issaquah Highlands (home will be complete Dec. 2004) I wanted to express my concerns about the Bypass project and share my views. I hope my opinions will contribute to the dialogue as we move forward towards a decision on this important issue.

I have reviewed the documents, spoken with residents of the community, and studied the facts. Based on this research I have decided that I do not support construction of the Bypass. I feel that while it may be an appropriate choice somewhere in the future, there are too many loose ends and questions lingering to approve a project of this magnitude. Some of the questions (and/or concerns) that I find most important are:

1. The negative impact the Bypass will have on wildlife migration east and west of the proposed road. Unless there is a way to create an open area for deer and other animals to make their way through the area, I believe that the proposed project negates the vision of Issaquah. What we are essentially doing is creating a wall between old town and its natural surroundings. Do we really want to enclose our historic district by major highways on all sides?
2. Traffic problems on the Issaquah/Hobart road where the Bypass would end. The 520 in Redmond is an excellent example of the problems we can expect to encounter unless there are proposals made to expand the 2-lane highway. The 520 abruptly ends in Redmond and forces traffic to continue east on a 2-lane highway. Anyone that lives in Redmond Ridge and commutes west can attest to the arresting traffic problem this creates. If the Bypass is built, developers will most certainly look to construction out towards Hobart in the near future, and congestion and sprawl will become a much bigger problem then it is unless a proposal is made to widen the 2-lane Iss/Hobart road. How much will that cost on top of the \$30 million required to build the bypass?
3. Noise and air quality. Does it make sense to introduce obvious environmental concerns in lieu of a conceived traffic problem, when the Bypass itself will create a potentially more dangerous traffic problem then that which already exists? Certainly, if the purpose of the Bypass is to reduce traffic on Front Street and maintain the charm of Old Town Issaquah, a 4 lane highway running past our high school and through our wetlands will kill that charm which we are trying to preserve. There's nothing warm and charming about heavy road construction, after all, the famous movie about Montana's natural beauty was not called "A Bypass Runs Through It."

These are my top 3 pain points. I have others but I will focus on these. My proposed solution?

1

1. A bridge will be used to cross the North Tributary and Wetland GW. The design proposed will permit a shallow structural section for the bridge deck that provides for 5-6 feet of clearance for wildlife passage for small mammals. Recognizing that more needs to be understood regarding the migration patterns of the large mammals between Tiger and Squak Mountains, the City agreed during the CP3 issue resolution process to participate monetarily and facilitate the initiation of a study and planning effort that addresses regional wildlife connectivity. Such participation would be proportionate to project impacts. The City also agreed to facilitate a discussion during the project design stage with WSDOT through an inter-agency request to evaluate maintenance needs at existing wildlife crossing on I-90 in coordination with WDFW and USFWS. Also, the Office of Archaeology and Historic Preservation concurred that the current project as proposed will have "no adverse effect" on National Register eligible or listed historic and cultural resources.

2

2. King County will determine the need for future improvements to Issaquah-Hobart Road. At present, the County has no plans to improve that roadway.

3

3. Your comments are noted. Noise and air quality impacts of Modified Alternative 5 are addressed in Chapter 3 of this Final EIS.



Let's get the projects done that need be done immediately. For example:

- Another I-90 crossing
- Potential expansion of Newport Way
- Parking for downtown shoppers

Newport Way already has the makings of a strategic alternative route for traffic through the area. Let's look at some options on expansion there.

Again, I feel that it is too premature to consider building this bypass. There are many other options that would maintain the integrity of the natural community and keep in line with Issaquah's mission. Let's continue the discussion and find alternative, more environmentally friendly ways to cure the congestive sprawl. Numerous residents approved the Sunset Interchange among other large development projects, so they are certainly open to options. There is too much at risk here and I don't believe the potential benefits out way the risks.

Thank you for your time. I can be reached at 425-766-2175, or [scottaweiss1975@aol.com](mailto:scottaweiss1975@aol.com) if you have any questions or concerns.

Thanks,



Scott Weiss

July 16, 2004

Mayor Frisinger and Members of the Issaquah City Council  
P.O. Box 1307  
Issaquah, WA 98027

RECEIVED ON

Dear Honorable Mayor and City Council:

I am writing to let you know my support for the SE Bypass and the DEIS. I find the DEIS to be adequate. A lot of time and effort was put into the document and the result was found that it would be the greatest good to build the Bypass. Most of the opposing views of the Bypass are handled if you actually read the DEIS and are therefore unfounded.

Opponents say they are concerned about the environmental impact with the Bypass. However, congested traffic on Front Street creates air, water and noise pollution that harms the environment. The Bypass will have a positive net impact on the environment by getting rid of the congestion and improving water quality by a filtration system.

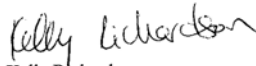
Issaquah agreed to build Talus and Highlands. Building the Bypass was integral in agreeing to these developments. We need to keep our promises and help improve traffic in Issaquah. To control growth through traffic will cut our throat. It should be controlled using the Growth Management Act and the zoning code.

As I attended the hearing for the DEIS, I was astounded to hear that some people didn't think Issaquah had a traffic problem. All you have to do is observe downtown Issaquah during morning and late afternoon hours and you will see this is not true. I commute from Tiger Mountain and I sit in traffic every day.

It is easy to become emotional about a topic. The council needs to set aside the emotions of the people and look at the solution logically. What is the greatest good for Issaquah? This is what occurred with the DEIS and it is recommended to build the Bypass.

Without the Bypass, Issaquah will stagnate. Its growth and economy will falter due to the air, storm water and noise pollution caused primarily by the debilitating effects of regional traffic. It is time to move forward. As a whole the DEIS is adequate. People can debate minute points of the DEIS to ad infinitum. We need to move forward using common sense and acting for the greatest good of Issaquah. Build the Bypass!

Sincerely yours,



Kelly Richardson  
14910 262<sup>nd</sup> Ave SE  
Issaquah, WA 98027

1

2

1. and 2. Your comments are noted. The DSEIS and this Final EIS indicate that the proposed project would support planned growth and development within the city and would help the city meet growth management goals and policies.

POB 965  
Issaquah, WA 98027  
July 9, 2004

RECEIVED ON

Mayor Frisinger and Members of the Issaquah City Council  
PO Box 1307  
Issaquah, WA 98027

CITY OF ISSAQUAH  
OFFICE OF THE MAYOR

Dear Honorable Mayor and City Council:

I am writing to let you know of my support for the SE Bypass.

Why am I compelled to support the bypass? I support it because I know you have to plan for and provide infrastructure improvements to ensure quality of life for future generations. My grandfather did it for me and I have a responsibility to my children and this community to do the same for them. Building the bypass provides traffic relief for 1.5 more generations so that as my kids grow up and start their families, hopefully here, they will have a downtown that they can enjoy.

For me, sadly, downtown has become an area I can only enjoy after 6:00 p.m. or weekends. I work in Issaquah but avoid going downtown to eat or shop during my lunch hour because the round trip drive and time required to find parking take so long that I don't have time to do much. So, I usually do most of my shopping and dining on Gilman Blvd.

We have lost so much of our mobility here in Issaquah! I can remember my mother driving me through town when I was about 7 years old and we would only pass 3-4 cars along the way. Growth happens whether we build infrastructure or not. We will make ourselves more miserable and hurt economic vitality if we don't plan and accommodate growth in a way that is an asset to our community.

Someone was quoted in the Issaquah Press saying something to the effect of, "Why should we build it (the bypass) so that the people of Kent can benefit?" That kind of thinking amounts to putting on regional blinders and serves no one. It's almost the same as people in Bellevue saying "Why should we expand 405 so that people from other cities can benefit?" The fact is that our transportation system is a regional system and as a leader of our community and our region, you have a responsibility to think regionally so that your piece of the puzzle, while beautiful by itself, fits well with the rest.

Please vote for construction of the Bypass.

Sincerely yours,

*Kari Magill*  
Kari Magill

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1. The City has received your letter and appreciates your input.

TRADEMARK CORPORATION  
BELLEVUE BUSINESS PARK  
2000 - 124TH AVENUE N.E.  
SUITE B-100  
BELLEVUE, WASHINGTON 98005  
(425) 883-7800 OR (425) 454-7000  
(425) 453-1709 FACSIMILE

RECEIVED ON  
JUL 13 2004  
CITY OF ISSAQUAH  
OFFICE OF THE MAYOR

July 12, 2004

Ava Frisinger, Mayor and  
Issaquah City Council Members  
P O Box 1307  
Issaquah, WA 98027

*Re: Issaquah By-Pass*

Dear Mayor and City Council Members:

I am the owner of Cascade Business Park on 12<sup>th</sup> and Newport and also original developer of Meadows Shopping Center. I support the by-pass project. I can tell you that each piece of the road infrastructure is interrelated and important.

The City of Issaquah is vital and growing, yet from a business perspective, it has an overall very poor traffic level of service. I get tenants who would love to work close to home, but fear their customers won't want to fight gridlock in the city.

I urge you to understand that this project is interrelated to other infrastructure and is important to be built. Traffic cannot be ignored.

Yours truly,



Steve Willard

GENERAL CONTRACTOR'S LICENSE #TRADEC\*2310R

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1. The City has received your letter and appreciates your input.

July 27, 2004

CITY CLERK'S OFFICE

To: City of Issaquah  
Bob Brock, Public Works

JUL 27 2004

RECEIVED

cc: Ava Frisinger, Mayor  
City Council members:  
Nancy Davidson  
Fred Butler  
Bill Conley  
Joe Forkner  
Russell Joe  
David Kappler  
Hank Thomas

COPIED TO ALL COUNCIL MEMBERS

Re: Comments on SDEIS for SE Bypass

Please add the following comments and questions about the SE Bypass to the official record.

Sheet A summarizes Air quality questions about the SDEIS.

Sheet B summarizes Noise pollution questions.

The last document references page numbers with specific flaws and omissions in the SDEIS regarding Air quality.

Is it really necessary to spend any more money on this document?

From a scientific viewpoint, the EIS would have to start at square one and go back and gather measured data in order to give us a true picture of how the Bypass would impact air quality.

Perhaps the words of Dan Ervin as quoted in the Issaquah Press (June 2, 2004) best predicts the inadequacies of this EIS. Referring to the recent Highlands' landslide, Dan said,

"The Geology is more complex than we anticipated. It wasn't consistent with what was in the (predevelopment environmental studies), and the system was based on erroneous assumptions about the geology."

Please do not put our water, air and our children's health in jeopardy by building a road based on a flawed and distorted EIS. The Bypass is a road that should not be built. Please spend no more money on this EIS. Rather than fund a final EIS, use the money to give us other traffic solutions now.

Respectfully,



Linda Seebeth  
PO 1769  
Issaquah, WA 98027

1. The EPA (Environmental Protection Agency) has set National Ambient Air Quality Standards (NAAQS), which specify maximum concentrations for carbon monoxide (CO), particulate matter less than 10 micrometers in size (PM<sub>10</sub>), particulate matter less than 2.5 micrometers in size (PM<sub>2.5</sub>), ozone, sulfur dioxide, lead, and nitrogen dioxide. The project area is in compliance with these standards for all pollutants, but because the Carbon Monoxide (CO) standards have been recently attained, the project is in a CO maintenance area, therefore local intersection level CO analysis is conducted.

The air quality analysis followed WSDOT's Environmental Procedures Manual. The air quality Chapter can be found at the following website:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/default.htm>

The Puget Sound Clean Air Agency (PSCAA) is responsible for monitoring, setting standards, and regulating development to achieve regional air quality standards in the King, Kitsap, Pierce, and Snohomish counties. For additional information regarding air quality in the region, please visit the PSCAA website at: <http://www.pscleanair.org> or call the PSCAA at 206-343-8800.

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A

It is against Issaquah's comprehensive plan to contribute to air disintegration. As the breathers of the air in Issaquah, our children's lives are dependent upon the accuracy of the SDEIS. Below are questions which address fallacies of the SDEIS.

• **Why does the SDEIS only model carbon monoxide (CO) ?**

Because of tailpipe emission controls, CO levels have significantly reduced in the last ten years. CO is considered to be a nonissue in the Puget Sound region today.

• **Why is there no data, measurements or modeling for ozone, particulate matter, lead, benzene, hydrocarbons, sulfur dioxide, nitrogen dioxide, and other nitrous oxides?**  
Particulate matter from diesel combustion and road debris (such as asbestos particles from brakes) is one of the greatest threats to health. It was the primary pollutant in the Puget Sound region on 276 days in 2003. Ozone was the primary pollutant on 86 days in 2003. The North Bend air monitoring station often has some of the highest ozone readings in the region because the Seattle plume gets stuck against the mountains.

• **Why are there no actual measurements?**

Predicted CO levels are based on predicted modeling from over ten years ago. Why wasn't available data from Puget Sound Clean Air used? Actual measurements for other air pollutants are also available, why wasn't this data included?

• **Does the SDEIS conform to NEPA and SEPA standards?**

While it may conform to transportation conformity, that does not mean it conforms to NEPA and SEPA. (National and State Environmental Protection Agencies)

• **Why does the SDEIS use outdated information?**

Some research cited is 10-15 years old. Updated research and data is available.

• **Why was no consideration given to the unique topography of the Issaquah valley?**

Mountains trap the Seattle-generated plume of pollution blown in our direction.

• **Why was there no identification and consideration given to the sensitive population (schools) impacted?**

Physical activity near streets with heavy traffic increases lung problems. With the road directly beside playgrounds and athletic fields, why is the sensitive population not named or considered?

• **Why was the air pollution impacts to existing forests not considered?**

Our forests are a valuable resource. Air pollutants can cause forest deterioration. Will the toxic bowl effect of the Issaquah Valley be detrimental to our forests?

• **How many cubic yards of material will be moved and how many trucks will it take?**

One trip is one way. How much pollution will be generated by diesel truck activity?

• **Why weren't the cost benefits of keeping forested areas forested considered?**

Forests function as air purifiers as well as water filters and noise buffers.

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2. The analysis follows WSDOT policy and guidelines relating to National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA). The complete Environmental Procedures Manual can be found at the following website: <http://www.wsdot.wa.gov/fasc/EngineeringPublications/Manuals/EPM/EPM.htm>  
This project meets the conformity criteria described in the Environmental Protection Agency's (EPA) Conformity Rule (Code of Federal Regulations, Title 40, Part 93).

3. The research cited is still current and accepted by WSDOT and FHWA.

4. The project area is in compliance with these standards for all pollutants, but because the Carbon Monoxide (CO) standards have been recently attained, the project is in a CO maintenance area, therefore local intersection level CO analysis is conducted. Regional emissions analysis is conducted by the Puget Sound Regional Council (PSRC). The PSRC must include the project in the Metropolitan Transportation Plan and Transportation Improvement Plan. The project is included in their analysis as project ISS-9.

5. Air quality effects are not evaluated for sensitive populations for roadway projects. The project followed WSDOT air quality guidelines, these guidelines can be found on the internet at the following website:  
<http://www.wsdot.wa.gov/fasc/EngineeringPublications/Manuals/EPM/425.pdf>

6. Air quality effects are not evaluated for effect to existing forests for roadway projects.

7. Pollution generated by diesel trucks was not quantified as part of this project. Mitigation measures to reduce pollution are detailed in section 7.1 of the Southeast Issaquah Bypass Draft EIS.

8. WSDOT has not established guidelines to conduct the cost benefit analysis of keeping forested areas forested. The project followed WSDOT air quality guidelines.

D

## Noise Pollution 7-7-04

- **Why were sensitive receptors not identified?**

This is a fallacy of the SDEIS. The number of young children and youth in close proximity to the schools should be given special attention as required by law. It is not adequate to consider the school as one building. With the thousand plus children in close proximity, potential health impacts must be considered for this sensitive population.

The population the road will impact must be characterized.

- **For a fair comparison, why doesn't the SDEIS compare a mitigated no-build option with the mitigated build options?**

Instead, the unmitigated no-build option is compared to mitigated build options. For thorough understanding, mitigated no-build should be explored and included in the study.

- **Why weren't noise levels measured in the afternoons?**

Don't we want to know the worst case scenarios so we know the truth?

- **What noise mitigation will be implemented?**

The SDEIS states that no noise mitigation is REQUIRED.

Construction noise mitigation is suggested and not required. We need to know what actual mitigation will be committed?

- **Why was no consideration given to the unique terrain of the Issaquah Valley?**

Will noise echo in the Issaquah basin?

- **Why was no consideration given to seasonal adjustments?**

Will noise levels change during rain, during summer months, during winter with no leaves on the trees?

- **How many cubic yards of materials will be moved during road building? How many trucks will it take to move earth? (1 trip is 1 way)**

We must have some understanding of truck noise level.

- **Will the Bypass be open to garbage truck traffic?**

Increased truck traffic will change the predictions of existing models since trucks are presently not allowed on certain streets. Was an increase in truck traffic considered in the model?

9

9. Please see response to Comment 5 above.

10

10. No mitigation is required as part of the No Build Option. Therefore no mitigation is proposed as part of this project.

11

11. Noise measurements are conducted during off-peak periods to ensure that traffic is free flowing. Traffic volumes are counted during the noise measurements and are input to a traffic noise model to predict noise levels. The noise model calculated noise levels are then compared to the noise levels measured. The noise model is then calibrated to within 2 dBA of the measured levels. Existing peak hour free flowing traffic volumes are then used to predict the Existing peak hour noise levels. Traffic volumes and roadway configurations of the project's Build alternative in the year 2030 are also used in the noise model to predict future noise levels and to assess noise impacts.

12

12. Final noise mitigation commitments would be provided prior to the Record of Decision for the proposed projects. The City has agreed to consider School District concerns, including noise impacts on school facilities.

13

13. Terrain features were included in the Traffic Noise Model.

14

14. The project followed WSDOT noise policy and procedures that were current during the analysis for the SDEIS, these guidelines can be found on the internet at the following website:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/policies.htm>

15

15. The noise analysis used truck traffic percentages that were supplied by the traffic team. Additional garbage truck traffic was not included in the analysis.



## Air Quality DSEIS Inadequacies

### Studies and Coordination

Summary, page 4-2:

Compliance with Transportation conformity does not confer compliance with SEPA and NEPA. How are those standards being addressed? This study only looks at carbon monoxide.

Carbon monoxide (CO) levels were modeled using predictions from an old MOBILE5b model (from Puget Sound Regional Council) which were then inserted into another model (CAL3QHC). There is no actual measurement of CO level. No hard data! Actual measurements for CO exist for the year 2000, so why were modeled predictions for 2000 used rather than actual measurements?

The methodology for predicting CO was based on the MOBILE5b model which predicted CO levels for the year 2000, meaning the model must have been run in the 1990's. This is old information and its accuracy is unknown. MOBILE6 software exists today. Why weren't actual measurements taken and then inserted in the CAL3QHC model?

Of all the air pollutants in the Puget Sound region, CO is one of the least concerns. Since tailpipe emissions have been regulated, CO is considered a nonissue. Why then is CO the only pollutant modeled? An EIS is not limited in scope to what it can examine. Do we want only what is legally required or the most accurate picture?

### Affected Environment

Summary, page 4-2

Where is the data from the Air Quality monitoring stations? Without a baseline we can not establish a trend line.

The station in North Bend has exceeded air quality standards since 2002. Data is available for this and other monitoring stations for PM2.5, O3 and CO.

Paragraphs 2.3 and 4 make general statements about carbon monoxide, ozone, and particulate matter, but there are no measurements. Why is there no measured data?

### Existing Conditions

Summary, page 4-4 & 4-5

#### Table 4-1

In "2000 Existing Conditions" under Sunset Interchange, CO levels are listed as NA. This is inaccurate and outdated. The Sunset Interchange is open. Why is current information not included?

Why is there no real world data? We need real numbers to tell us if the models were correct and to inform us of the true existing conditions.

Why was there no comparison of the predicted levels of CO for 2000 with the measured levels of CO for the year 2000? The data is available from EPA and indicates that the DSEIS numbers are too low.

Why was there no comparison of predicted levels of CO for 2005 with the measured levels for June 2004? An actual reading could tell us the accuracy of predicted levels. Our lives are dependent upon the accuracy of their predictions. Why is it not measured with available real world data?

Why is there no data for existing conditions of particulate matter, ozone, lead, nitrogen dioxide, nitrous oxides, hydrocarbons and other hazardous pollutants?

### Impact and Mitigation

Summary, page 4-5

Without actual data, how can the impacts be accurately predicted? Did the models include analysis of traffic backed up on the Bypass AND on Front St.? It is illogical to assume that all traffic would stay on the Bypass and not overflow onto Front St. Where are the models that show worst case scenarios of congestion of the Bypass and on Front St.?

### Conformity Finding

Summary, page 4-6

Compliance with Transportation conformity does not confer compliance with SEPA and NEPA. How are those standards being addressed?

16

16. The PUGET SOUND CLEAN AIR AGENCY (PSCAA) is responsible for monitoring, setting standards, and regulating development to achieve regional air quality standards in the King, Kitsap, Pierce, and Snohomish counties. For additional information regarding air quality in the region, please visit the PSCAA website at: <http://www.pscleanair.org> or call the PSCAA at 206-343-8800.

17

17. The PUGET SOUND CLEAN AIR AGENCY (PSCAA) is responsible for monitoring, setting standards, and regulating development to achieve regional air quality standards in the King, Kitsap, Pierce, and Snohomish counties. For additional information regarding air quality in the region, please visit the PSCAA website at: <http://www.pscleanair.org> or call the PSCAA at 206-343-8800.

18

Regional air pollutant trends have generally followed national patterns over the last 20 years. While the average weekday vehicle miles traveled in the central Puget Sound region has increased from 30 million miles in 1981 to 65 million in 1999 (PSRC 2000), pollutants associated with transportation sources have decreased over time due to more stringent federal emission standards for new vehicles and the gradual replacement of older, more polluting vehicles. The downward trend for pollution emissions is predicted to continue with the implementation of EPA Tier II Gasoline/Sulfur Rule.

18. Intersection level monitoring is not required by EPA, WSDOT or FHWA.

19

19. The project followed EPA, WSDOT and FHWA guidelines. Traffic data was obtained from the Southeast Issaquah Bypass Traffic Analysis.



## Technical Appendix H

### Studies and Coordination

Appendix H, page 2:

"Ozone concentrations that would result from this project were not modeled, because ozone is a secondary pollutant generated through a series of complex reactions between pollutants emitted from motor vehicles and other sources."

This statement is inaccurate. Ozone quantitative models exist. It has been well established that ground level ozone is predominantly from vehicle emissions. There is scientific literature out there specifically for traffic. Ozone monitoring stations are located throughout the Puget Sound region, including Issaquah and North Bend. Why was ozone not examined?

During the summer of 1990, ozone concentrations exceeded the 0.12-ppm NAAQS several times at monitoring stations in both Enumclaw and Lake Sammamish State Park. Because of these violations, EPA designated all of Snohomish, King, and Pierce Counties as nonattainment for ozone. In 1997, the EPA determined the Puget Sound ozone nonattainment area had attained the public health-based NAAQS for ozone. Based on this determination, EPA redesignated the Puget Sound to attainment, and approved the associated air quality maintenance plan (Ecology 1997). This plan includes measures to continue controlling ozone emissions, and is intended to assure the standard is maintained for at least ten years. Why is most current data not included? North Bend exceeded ozone standards on July 29, 2003.

Appendix H, page 7:

Regarding NAAQS (National Ambient Air Quality Standards) and new EPA standards, the text states: "Because there is not yet sufficient background monitoring data, the EPA hasn't yet implemented the new standards." This is an outdated statement! EPA has researched, developed monitoring criteria and is now implementing the new 8 hour standards. Why is current and best available information not used?

Appendix H, page 8

Ambient Air Quality Standards include more than pollutants listed in Table 2. Why was the DSEIS limited in its scope? We should have the best and most accurate predictions of air which includes particulate matter, (PM<sub>2.5</sub>) which is generated from combustion engines (especially diesel) and causes severe health problems in children. There is more data available for PM<sub>2.5</sub> than for any other pollutant, yet it is not looked at in the DSEIS. Why not?

### Climate

Appendix H, page 9

The DSEIS does not mention climate change, yet atmospheric scientists from UW have forecast hotter, drier summers which would increase ozone levels. Why was climate change not considered to predict future air quality? DSEIS gives no data. Please include recent data for recent hot dry summers.

### Terrain

The DSEIS does not consider terrain, yet terrain can influence air quality. Mountains trap pollutants and increase toxic levels. Why was the unique terrain of Issaquah not considered in evaluating air pollution?

### Particulate Matter

Appendix H, page 10

The DSEIS states The EPA's Clean Air Scientific Advisory Committee is currently reviewing recent health assessment data on diesel emission, however the data is not yet available for citation.

This is inaccurate. Data is now available. Why wasn't the most accurate and updated information used to evaluate Issaquah's air quality? DSEIS gives no data. It is an abrogation of science not to have actual measurements.

### Ozone

Appendix H, page 10 & 11

Why is there no data for ozone? There are monitoring stations in Issaquah and North Bend. To

20

The EPA has set National Ambient Air Quality Standards. The project area is in compliance with these standards for all pollutants, but because the Carbon Monoxide (CO) standards have been recently attained, the project is in a CO maintenance area, therefore local intersection level CO analysis is conducted.

Ozone is not produced directly, but formed by a reaction between sunlight, nitrogen oxides (NO<sub>x</sub>), and hydrocarbons (HC). The EPA, WSDOT and FHWA have not established modeling procedures for Ozone.

provide the citizens with the most complete and update information, we need models of ozone levels. This data has been available at least since 2000. In 2003, ozone was the highest pollutant in King County on 86 days and North Bend exceeded the 8 hour standard on July 29, 2003. This air shed is part of an ozone maintenance area. How do we know whether this project will not contribute to increased ozone without data? It is an abrogation of science not to have actual measurements.

#### **Hazardous Air Pollutants**

Appendix H, page 11

Although the DSEIS lists hazardous chemicals, why were none of these air pollutants evaluated, such as benzene, Nitrogen Dioxide (NO<sub>2</sub>-a byproduct of fossil fuel combustion from motor vehicles) or Sulfur Dioxide (SO<sub>2</sub>) which are monitored in King County? Since these pollutants contribute to ground level ozone, and benzene emissions in the Puget Sound region are higher than the national average, why was there not an evaluation or model of those pollutants? For the health of the citizens of Issaquah, don't we want the most accurate air quality evaluation? DSEIS gives no data.

#### **Greenhouse Gases**

Appendix H, page 11

"Automobiles also emit greenhouse gases, primarily carbon dioxide." Why is there not an evaluation of CO<sub>2</sub> emissions in the DSEIS? CO<sub>2</sub> emissions are a primary contributor to greenhouse gases as well as NO<sub>2</sub> and methane. Why does the DSEIS fail to examine any of these gases?

"...sport-utility vehicles and light trucks emit about 50% more CO<sub>2</sub> per mile because they are less efficient." Since there are a higher number of SUVs driven in the Eastside, why was there not an evaluation to account for higher emissions?

Why was Issaquah's unique setting and greater number of SUVs not examined?

Why was *NOTHING* evaluated? DSEIS gives no measured data.

#### **Methodology**

Appendix H, page 13

Compliance with Transportation conformity does not confer compliance with SEPA and NEPA. How are those standards being addressed? This study only looks at carbon monoxide which is no longer a problem in the Puget Sound region.

1. This reason for only modeling CO is illogical. There is not a correlation between amount of a toxin and adverse health threats. (A small amount of one toxin may be more dangerous than large amounts of another.) It is illogical to imply that other toxins produced in smaller amounts are not dangerous and need not be modeled. What is the amount of CO that will cause adverse health effects? What is the amount of PM<sub>2.5</sub> or PM<sub>10</sub> that will cause adverse health effects? What is the amount of ozone that will cause adverse health effects?

2. This reason for only modeling CO is outdated. The study cited (EPA, 1993) is over ten years old. More recent studies show PM<sub>2.5</sub> to be one of the most dangerous pollutants to children. The text states "it is generally not necessary to account for other sources of CO near the project areas" but the study does not have to be limited to CO. Why is there such a narrow scope?

3. The study cited (Wayne, 1991) is over ten years old. During that time more accurate modeling tools have been developed. Why isn't up to date information included? If accurate predictions cannot be made using modeling, this is a compelling argument for using real world data. Why no actual measurements?

4. The study cited is over 15 years old! (Erlach, 1977) Why is this old study included? Since 1977 many other toxins have been studied and identified to cause harm, such as particulate matter and ozone.

Why were predicted numbers used rather than actual data which is available for 2000?

#### **MOBILE5b**

Appendix H, page 13

Why were numbers taken from this old model rather than actual data?

#### **CAL3QHC Model**

Appendix H, page 14

20

21

21. The EPA (Environmental Protection Agency) has set National Ambient Air Quality Standards (NAAQS), which specify maximum concentrations for carbon monoxide (CO), particulate matter less than 10 micrometers in size (PM<sub>10</sub>), particulate matter less than 2.5 micrometers in size (PM<sub>2.5</sub>), ozone, sulfur dioxide, lead, and nitrogen dioxide. The project area is in compliance with these standards for all pollutants, but because the Carbon Monoxide (CO) standards have been recently attained, the project is in a CO maintenance area, therefore local intersection level CO analysis is conducted.

The air quality analysis followed WSDOT's Environmental Procedures Manual. The air quality Chapter can be found at the following website:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/default.htm>

The Puget Sound Clean Air Agency (PSCAA) is responsible for monitoring, setting standards, and regulating development to achieve regional air quality standards in the King, Kitsap, Pierce, and Snohomish counties. For additional information regarding air quality in the region, please visit the PSCAA website at: <http://www.pscleanair.org> or call the PSCAA at 206-343-8800.

Why was free-flow traffic only modeled at the posted speed limit? What is the more realistic data for 5 or 10 mph?

#### **Affected Environment**

Appendix H, page 17

Why isn't data included which shows that the Puget Sound region was out of compliance for at least one NAAQS pollutant?

Why isn't more recent data included which shows a rise in vehicle emissions because of recent growth?

Why isn't data included for other dangerous emissions such as particulate matter?

#### **Regional Air Pollution Trends**

Appendix H, page 17

If other pollutants have not followed the same downward trend as CO, why were they not modeled as they may pose greater health risks--especially hydrocarbons because they drive ozone?

Why wasn't climate change prediction (hotter, drier summers) factored into the regional trends?

#### **Air Quality Monitoring**

Appendix H, page 19

There are other monitoring stations in the area: one in North Bend, one at 305 Bellevue Way, one at 143rd and NE 8th in Bellevue. Why was the data from these stations not included in this report? The CO monitoring stations were shut down because CO is not considered a problem in the region any longer, but why weren't other regulated toxins examined?

#### **Impacts**

Appendix H, page 22

"Future decreases in emissions per vehicle will partially offset increases in emissions from growth..." Where is the data to support this?

#### **Secondary and Cumulative Impacts**

Appendix H, page 24

What are the effects of project-induced traffic?

What are the long term effects of increased land use and speculation by developers?

Where is the data which includes induced travel and induced growth--above the planned development?

#### **Mitigation**

Appendix H, page 25

Construction mitigation is listed as "possible" measures. What are the actual measures that will be required?

Will the project require using low diesel fuel?

#### **Conformity**

Appendix H, page 27

Compliance with Transportation conformity does not confer compliance with SEPA and NEPA. How are those standards being addressed?

#### **Omissions**

No other pollutants are considered other than CO.

Sensitive population (schools) around the Bypass not considered.

Cost benefits of keeping forested areas not considered.

Impacts of denuded hills (loss of trees plus emissions) not considered.

Worst case scenarios not considered--hottest days, busiest hours, most congested.

No consideration to the unique topography of Issaquah valley.

It is against Issaquah's comprehensive plan to contribute to air disintegration.

21

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22. The PUGET SOUND CLEAN AIR AGENCY (PSCAA) is responsible for monitoring, setting standards, and regulating development to achieve regional air quality standards in the King, Kitsap, Pierce, and Snohomish counties. For additional information regarding air quality in the region, please visit the PSCAA website at:

<http://www.pscleanair.org> or call the PSCAA at 206-343-8800.

Regional air pollutant trends have generally followed national patterns over the last 20 years. Although the average weekday vehicle miles traveled in the central Puget Sound region has increased from 30 million miles in 1981 to 65 million in 1999 (PSRC 2000), pollutants associated with transportation sources have decreased over time due to more stringent federal emission standards for new vehicles and the gradual replacement of older, more polluting vehicles. The downward trend for pollution emissions is predicted to continue with the implementation of EPA Tier II Gasoline/Sulfur Rule.

23

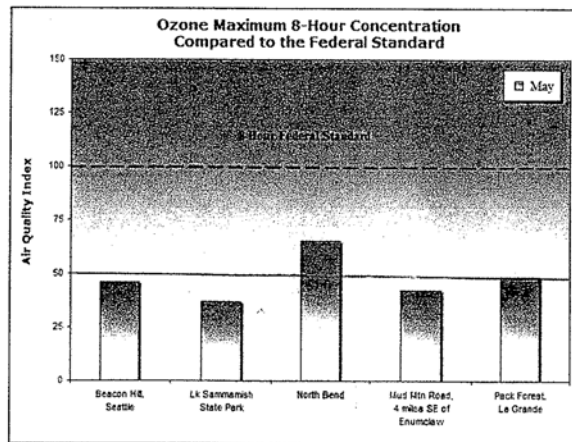
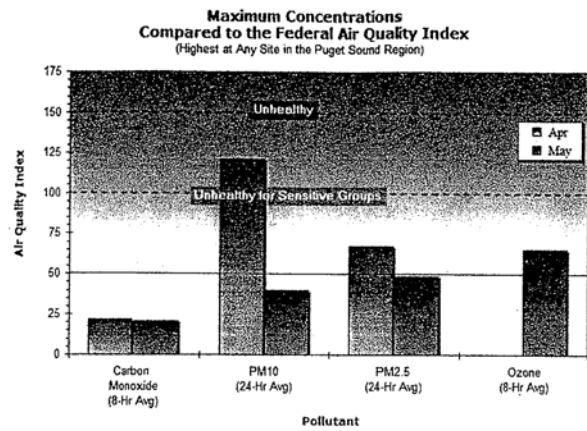
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<http://www.pscleanair.org> or call the PSCAA at 206-343-8800.

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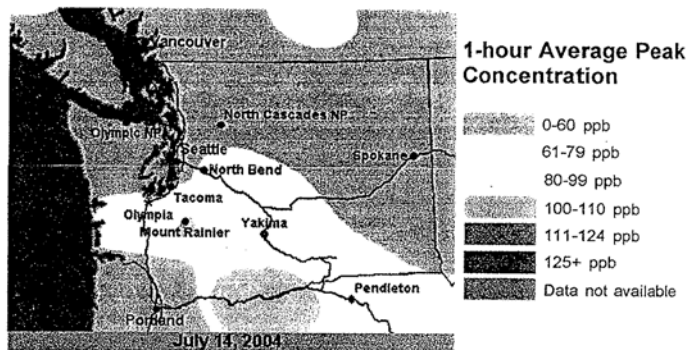
24

24. Final mitigation commitments will be determined prior to the Record of Decision. It is not known whether low-diesel fuel will be considered.



# Washington Ozone Maps for July 14, 2004

U.S. Environmental Protection Agency



MCCULLOUGH HILL BKSO KRITSCHMER SMITH

Courtney E. Flors  
2025 First Ave., Suite 1130  
Seattle WA 98121-2100  
206-448-1818  
206-448-3444 Fax  
cflors@mhfs.com

A Professional  
Service Corporation

July 30, 2004

Robert Brock  
Public Works Director  
City of Issaquah  
Public Works Department  
PO Box 1307  
Issaquah, Washington 98027

Re: Southeast Issaquah Bypass  
Comments on Supplemental Draft Environmental Impact Statement

Dear Mr. Brock:

We represent Wellington Park Pointe LLC ("Wellington") and are writing to provide comments on the supplemental draft environmental impact statement ("SDEIS") issued in June 2004 for the Southeast Issaquah Bypass ("Bypass") project. As the owner and developer of the proposed "Park Pointe" urban village project, Wellington strongly supports the Bypass and the City's Preferred Alternative (Alternative 6). The SDEIS contains a thorough analysis of the significant environmental impacts of Bypass construction as required by the State Environmental Policy Act (SEPA).

The SDEIS fails, however, to adequately analyze environmental impacts associated with the No Action Alternative (Alternative 7). The City has been planning for the Bypass since the early 1990s. If the City adopts the No Action Alternative, and decides not to construct the Bypass after 10 years of land use planning and traffic modeling premised on its construction, SEPA would require a detailed analysis of this decision's significant impact on land use planning and traffic concurrency. The existing analysis in the SDEIS of Alternative 7 would be patently insufficient.

Our specific comments are as follows:

1. Interlocal Agreement. The DSEIS does not acknowledge the 2001 Interlocal Agreement (ILA) between the City and King County that commits the City to design, acquire rights-of-way and construct the Bypass. The ILA notes that the "City of Issaquah Comprehensive Land Use Plan has identified the need for this Project." Since the ILA was executed, King County has invested considerable funds in reliance on the Bypass.

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1

1. Impacts and mitigation measures for land use are considered for the No Action alternative in the DSEIS, and in Chapter 3 of this Final EIS. However, a detailed study of transportation concurrency is beyond the scope of this project. Under the City's comprehensive planning process, the six-year Transportation Improvement Program is reviewed and updated annually to reflect changes in traffic and land use conditions. If the proposed project is not constructed, future comprehensive planning efforts would review and revise needed improvements to assure compliance with transportation concurrency and growth management policies.

2

2. The DSEIS acknowledges that the proposed project would be compatible with King County policies and the Issaquah Comprehensive Plan. The City will consider the project's relationship to local plans and policies, and the 2001 Interlocal Agreement, in its decision on the project.

July 30, 2004  
Page 2

In Issaquah, this formal, binding agreement catalyzed a decade of land use and transportation planning designed to relieve the high volume of pass-through traffic through the City and create additional capacity for new development on City roadways. If the City decides to pursue the No Action Alternative, the DSEIS must discuss the ILA and analyze the potential, unplanned impacts on the City's and King County's transportation systems.

2. Transportation Planning. The DSEIS fails to note that the Bypass is included in the City's concurrency model, the Transportation Needs Report for the East Sammamish Community Planning Area and Issaquah's Transportation Improvement Program for 2002 through 2007. These tools comprise the City's concurrency management system and provide the basis for the City's approval of specific land use projects. If the City were to decide not to construct the Bypass, it would undo a decade of land use planning and render its concurrency model meaningless. This would put the City in the position of predicting whether it will have adequate transportation capacity for the hundreds of new housing units it has approved based on a transportation model that included the Bypass.
3. Concurrency. City arterials are currently failing GMA concurrency standards *even assuming construction of the Bypass*. The City has identified some interim approaches to address its concurrency problems, but these interim measures, as well, assume construction of the Bypass. Again, because the City has planned for the Bypass for a decade, it has no way of knowing how its land use and transportation assumptions would be impacted if the City were to decide not to build this essential link between Front Street South and I-90.
4. Park Pointe Project. The May 2003 Pre-Preliminary Draft EIS for the Park Pointe project notes that the project is dependent on the proposed SE Bypass. The preferred alternative for the Park Pointe project now includes 660 residential units (including an assisted living facility), approximately 164,000 square feet of professional and administrative office, and approximately 6,000 square feet of commercial/retail space. It is worth noting, however, that all six alternatives in the DSEIS assume construction of the Bypass. Wellington, like the City, has been planning on its construction. The DSEIS should more thoroughly assess the impacts of the No Action Alternative on the six Park Pointe development alternatives, all of which assume construction of the Bypass.

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3. and 4. It is acknowledged that the proposed project has been included in the City's traffic model and transportation plans. As indicated above, if the proposed project is not constructed, the City would be expected to evaluate future development and transportation needs through its comprehensive planning process.

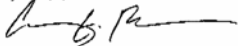
5. The Park Pointe development is not reliant on the SE Bypass for access. This comment letter was prepared before the Issaquah City Council amended the City's comprehensive plan to remove the Urban Village designation for the Park Pointe site. The Park Pointe proposal has been subsequently reduced to the present proposal for 356 residential units, much less than was previously proposed. At the reduced density, the Park Pointe project would not be dependent upon the SE Bypass roadway, and the two projects would not be dependent upon each other.

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July 30, 2004  
Page 3

We appreciate the opportunity to provide these comments and urge the City to follow through on its commitment to King County and the citizens of Issaquah to construct the Bypass. The City has approved several large developments based on future capacity to be provided by the Bypass, and the Growth Management Act (GMA) requires the City to act in compliance with its Comprehensive Plan and to provide adequate transportation facilities to accommodate approved and anticipated development. We believe a decision not to construct the Bypass—a linchpin of the City's current Comprehensive Plan—would violate both SEPA and the GMA.

Very truly yours,



Courtney E. Flora

cc: Wellington Park Pointe LLC

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May 27, 2004

Margaret Petty  
23328 SE 113th St.  
Issaquah, WA 98027-8786

CITY OF  
**ISSAQUAH**  
Department of Public Works / Engineering  
PO Box 1307 • Issaquah • WA • 98027  
(425) 837-3400 • Fax (425) 837-3409

Dear Friend:

On behalf of the City of Issaquah, I would like to encourage you to attend the Southeast Issaquah Bypass Supplemental Draft Environmental Impact Statement (SDEIS) Open House and Public Hearing. The SDEIS Open House and Hearing will be held July 15, 2004 between 5:30 and 8:00 pm at the Issaquah High School Commons. On the back of this letter you'll find details about this important meeting, as well as the locations where you can review the SDEIS. To ensure that we hear all public comments, we will offer you a variety of ways to comment on the SDEIS at the July 15, 2004 Public Hearing. They will include:

Orally Comment Publicly to a Hearing Official

A Hearing Official will be available to hear all public comments. If you wish to make a public comment in front of the audience at the Hearing, you'll be asked to complete an "I Wish To Speak" card when you arrive. After you return your postcard to the sign-in desk, you'll be asked to wait until your name is called, at which point the Hearing Official, as well as the audience-at-large will hear your comments on the adequacy of the SDEIS. Your comments will also be recorded by a court reporter. In order to provide time for all who wish to speak to do so, we ask that you limit your comments to a 3 minute time period and focus only on the adequacy of the Southeast Issaquah Bypass SDEIS.

Orally Comment Privately to a Hearing Official

Although all comments will be published in the Final EIS's Public Record, we recognize that some people are more comfortable giving their verbal comments in a more private setting. For this reason, at the July 15 SDEIS Hearing we will also offer you the opportunity to provide your comment on the adequacy of the SDEIS privately to a Hearing Official and court reporter. If you wish to provide your oral comment using this method, you'll be asked to follow the signs to a corner of the Commons. There you will find a Hearing Official and court reporter ready to hear your comments in a more sequestered setting. In order to provide time for all who wish to speak to do so, we ask that you limit your comments to a 3 minute time period and focus only on the adequacy of the Southeast Issaquah Bypass SDEIS.

Comment in Writing

All written and verbal comments are given equal consideration in the EIS process. If you would like to submit your comments on the adequacy of the Southeast Issaquah Bypass SDEIS in writing, please do so by July 30th, 2004. All comments must be mailed to me (Bob Brock, Public Works Director) at the City of Issaquah, PO Box 1307, Issaquah, WA 98027. Again, for your comments to be considered in the development of the Final EIS for this project, they must be received by July 30, 2004.

I look forward to seeing you at the Southeast Issaquah Bypass Supplemental Draft Environmental Impact Statement (SDEIS) Open House and Public Hearing July 15, 2004. In the meantime, if you have any questions, please contact Pam Fox, SE Issaquah Bypass Project Coordinator at (425)837-3423.

With best regards,  
Robert Brock  
Public Works Director

*There is no need for the SE by pass. With the elimination of parking on second avenue and the new turnst access to I 90 all you need are a couple of good signs directing east & west bound I 90 traffic. There is no problem if you use your heads to make what we have work. Also signage on highway 18 directing traffic to I 90 west and east would be beneficial.*

*Thank you  
Margaret Petty*

1

1. The City has received your letter and appreciates your input.

KAREN JAMES  
MUSICIAN  
5516 231ST AVE SE  
ISSAQUAH WA 98029

City of Issaquah  
City Council

9 July 2004

Dear Issaquah City Council:

I regret that I will be unable to attend the hearing on the Southeast Bypass. After much thought, I have decided that building the Southeast Bypass would have more problems than benefits for the following reasons:

- ① The opening of the Sunset Interchange has changed traffic patterns. It is very unclear to me whether the Southeast Bypass would be good without a study of the new traffic flow - more money down the drain.
- ② There is already a "bypass" of sorts in Newport Way. If we want people to go around downtown Issaquah, use some of the money saved by not building the bypass to coordinate the Newport Way lights (as well as the Front Street lights).
- ③ As the landslide by the Highlands shows, the water table around here can unleash surprises. Back when my neighborhood was part of unincorporated King County, the County decided to put in drains whose open ditches along the side of the road had been. It took them quite a bit longer than they had planned because they kept encountering small natural springs any time they dug a little. I could easily see the bypass going way over budget because of surprise water sources and changes in flow as you remove vegetation. The bypass is already too expensive.
- ④ The money for the bypass would be better spent finding

1

1. Future year traffic modeling did account for opening of I-90 Sunset Interchange and potential traffic patterns based on that modeling were reflected in traffic volumes and other data provided in the DSEIS and this FEIS. Traffic data for the proposed project indicate that Alternative 5/Modified Alternative 5 would substantially improve operations for north-south travel conditions and accessibility to I-90 from Front Street and the proposed SE Bypass roadway.

2

2. Subsurface soil and groundwater conditions change significantly over relatively short vertical and horizontal distances in the project vicinity and it is not possible to compare conditions elsewhere with the proposed project area. The proposed project is not expected to result in adverse impacts on groundwater in the Lower Issaquah Valley aquifer.

another route over/under I-90, coordinating stoplights, (and possibly adding + then coordinating stoplights on 2<sup>nd</sup> Ave because of the Sunset interchange). These projects would also benefit more Issaquah residents.

⑤ I don't like the noise problems and air quality degradation from exhaust that would adversely impact Issaquah High School.

Finally, the Issaquah Press commented that several homes would be destroyed, although it dismissed 3 as rentals and one as a Habitat for Humanity house. I don't know who is being supported by rental income from the houses, but I find it HIGHLY UNETHICAL to tear down a Habitat for Humanity house that has been built with hard volunteer work and sweat equity. How dare we even consider taking away someone's first and probably only home. Let's just ~~make~~ make it a policy to create at least one homeless family a year through city policy, shall we? Issaquah is better than that.

Sincerely,  
Karen Jones

3

3. The Issaquah School District has expressed concern about noise and safety impacts to Issaquah High School, Clark Elementary School, Tiger Mountain Alternative School, and the athletic facilities. Minimization of these impacts are accomplished by rejecting the North A alignment in favor of either the North B alignment or the North C alignment and selecting South A which avoids the intersection with 2<sup>nd</sup> Avenue that would encourage traffic use.

4

4. The South C alignment is where the home constructed with assistance from Habitat for Humanity is located. All residents would be compensated under the Uniform Relocation Act and assistance would be provided to find them replacement housing. was not carried forward in the Final EIS. Under Modified Alternative 5, the proposed project would necessitate the acquisition of up to eight homes in the south project area, but not the Habitat for Humanity house. This will be accomplished following state and federal rules to insure full compensation for the property owners, including relocation expenses.

## **Public Meeting Comment Forms and Transcripts**



CITY OF ISSAQUAH  
**SOUTHEAST ISSAQUAH  
BYPASS**

RECEIVED  
JUL 29 2004  
PUBLIC WORKS ENG.

## COMMENT FORM

Draft Supplemental Environmental Impact Statement Public Hearing • July 15, 2004

Welcome to the Southeast Issaquah Bypass Draft Supplemental Environmental Impact Statement (DSEIS) Public Hearing and Open House. You are encouraged to review the Draft and offer your comments on its adequacy and completeness for inclusion in the Final EIS. At today's Project Public Hearing and Open House, individuals may view project displays and talk informally with project team members as well as submit testimony to a court reporter. Written comments and letters may be turned in at today's Public Hearing or mailed to Bob Brock, Public Works Director, City of Issaquah, PO Box 1307, Issaquah, WA 98027. For your comments to be considered in the development of the final environmental impact statement for this project, they must be received by the City of Issaquah by July 30, 2004. All comments received during the comment period will be considered. *Verbal and written comments are given equal consideration.*

**SE Issaquah Bypass  
Draft Supplemental Environmental Impact Statement Comments**

I attended the meeting on July 15th. I was not sure that was the appropriate forum to air my concerns about the Bypass. As it turns out, it would have been. At any rate I welcome this opportunity to relay my opinion/concerns. In the summer of '2000 we became enchanted w/ Issaquah & bought a charming new construction home on 2nd Ave. behind the High school trail head, pkg. lot off 2nd Ave. During our review period prior to purchase, I was made aware of the Bypass issue. At that time it was not pointed to

**OVER PLEASE.....**

me as a controversy. The builder Richard Warren and his Real Estate Co. Wescott assured me that the bypass was being built behind the C.D.S. church off 6th. It investigated the bypass alignments as posted at the community center. There was no Alternative 6, South alignment C posted or referenced anywhere. I asked the city if there were other options not posted, the answer was no. We bought our home based on this. As it now turns out "South C" has become "The" route of choice. ~~We~~ We were shocked & dismayed that this was an alternative NOT made available to us. Our lives have been turned upside down. We have two small children and would NEVER have bought this house had the city made full disclosure. We are forced to wait & see before we pursue litigation. We are VERY disappointed with the disregard Issaquah has for us.

We must have your contact information for your comments to be considered in the final environmental impact statement.

Name Jeff Sargent  
 Address 960 2nd Ave SE  
 City Issaquah State WA Zip 98027  
 Phone (optional) 206-312-9269 E-mail (optional) js@jeffsargent.com

Return to

Bob Brock, Public Works Director, City of Issaquah,  
 PO Box 1307, Issaquah, WA 98027  
 no later than July 30, 2004

1

1. After issuance of the SDEIS, the Issaquah City Council reviewed the proposed project. Modified Alternative 5 was chosen as the preferred alternative because it is the only build alternative that would have impacts that can be effectively mitigated. The other build alternatives considered in the SDEIS would have impacts considered which are considered unacceptable. South A is the selected preferred alternative alignment for the southern portion of the project area.



CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH  
BYPASS

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**SE Issaquah Bypass  
Draft Supplemental Environmental Impact Statement Comments**

The EIA answered some issues, but leaves just as many questions unanswered. A few issues which still concern me are as follows:

→ Noise impact of the noise that will bounce off of the large retaining walls

→ Air quality which will be effected in and around the elementary and high school in which my children will and do attend currently. Insulation to walls in schools are not good enough.

OVER PLEASE.....

1

1. WSDOT's Traffic Noise Analysis and Abatement Policy and Procedures guidance states that, though some sound may be reflected from a barrier placed on one side of the roadway to the unprotected side, little benefit is derived from making the wall absorptive. Furthermore, studies have shown that any measured increases in sound levels have been less than can be perceived by normal human hearing.

2

2. Air quality impacts under Modified Alternative 5 are addressed in Chapter 3 of this FEIS. The proposed project is not expected to result in substantial impacts on local air quality.

Land Use, the bypass would create pressure to increase development south of town. If you build it, they will come which will diminish the quality of life for which I and my family moved here for some ten years ago.

These are simply a few concerns I still have. I too am a daily commuter, and the diversion of traffic down Newport, Front Street & 2nd seem efficient enough. My commute has come down to 10 minutes.

I ask you not to build

We must have your contact information for your comments to be considered in the final environmental impact statement.

Name Kevin Brown

Address 23863 SE 98th Pl.

City Issaquah State WA Zip 98027

Phone (optional) 425-552-8992 E-mail (optional)

Return to  
**Bob Brock, Public Works Director, City of Issaquah,  
PO Box 1307, Issaquah, WA 98027  
no later than July 30, 2004**

3

3. The SE Bypass SDEIS discusses the potential land use impacts of the SE Bypass including encouraging additional development in rural areas of King County. The Bypass is a 1.1 mile limited access road in Issaquah that would not change the road capacity or accessibility south of City limits, and changes to land use plans and zoning that are prerequisites for allowing increased density over that which is presently permitted, would require separate environmental review and approval by the respective jurisdiction.





CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH  
BYPASS

## COMMENT FORM

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SE Issaquah Bypass  
Draft Supplemental Environmental Impact Statement Comments

Due to the rural nature of Issaquah Harbor Rd.,  
the existing congestion at the <sup>(Hazy garden)</sup> para-sailor park  
and entrance to Mirror Mountain I ask that you  
Not consider any option to push traffic through  
Issaquah. The S.E. Bypass (as you call it) will  
ruin the existing neighborhood in south Issaquah  
while allowing people to commute. Spend the money  
on parking for business in Old & New Issaquah.

Consider a couple of options to mitigate traffic:

OVER PLEASE.....

1. Reduce speed limit to 35 mph from south Issaquah to Hwy 13 along Issaquah Hobart Rd.

- safer by the hang glider park
- safer by entrance to Mirror mount
- consistent w/ East Lake Sammamish Parkway
- Commuters will find another way
- Does not impact existing neighborhoods

2. Recheck at traffic studies:

- all traffic studies have been done prior to the economic down turn which is regulating traffic substantially.
- Majority of new economic growth will provide different work shifts. Due to the different jobs & different sectors the jobs will be offset in.

3. Just say no! (Nancy Reagan)

We must have your contact information for your comments to be considered in the final environmental impact statement.

Name Jesse W. Hatfield

Address 965 Front Street South

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Phone (optional) 392 7866 E-mail (optional) \_\_\_\_\_

Return to

Bob Brock, Public Works Director, City of Issaquah,  
PO Box 1307, Issaquah, WA 98027  
no later than July 30, 2004

1

1. Issaquah-Hobart Road in the area mentioned is within King County jurisdiction, and thus the city has no control over speed limits. Reducing speed limits or using other traffic management methods to discourage travel along Issaquah-Hobart Road would not result in a significant benefit for managing traffic congestion in the project area. Additional information on alternatives such as this is included in Chapter 2.

2

2. Comments noted. Future traffic patterns are analyzed in traffic modeling for the proposed project using recent data.



CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH  
BYPASS

## COMMENT FORM

Draft Supplemental Environmental Impact Statement Public Hearing • July 15, 2004

Welcome to the Southeast Issaquah Bypass Draft Supplemental Environmental Impact Statement (DSEIS) Public Hearing and Open House. You are encouraged to review the Draft and offer your comments on its adequacy and completeness for inclusion in the Final EIS. At today's Project Public Hearing and Open House, individuals may view project displays and talk informally with project team members as well as submit testimony to a court reporter. Written comments and letters may be turned in at today's Public Hearing or mailed to Bob Brock, Public Works Director, City of Issaquah, PO Box 1307, Issaquah, WA 98027. **For your comments to be considered in the development of the final environmental impact statement for this project, they must be received by the City of Issaquah by July 30, 2004.** All comments received during the comment period will be considered. *Verbal and written comments are given equal consideration.*

### SE Issaquah Bypass Draft Supplemental Environmental Impact Statement Comments

My objection to any bypass through the SE Corridor is based on the principle that making increased TRAFFIC EASIER will assist to create more TRAFFIC... It appears clearly to me the city of ISSAQUAH is TAKING IT'S CITIZENRY DOWN THE ROAD TO HIGHER DENSITY THE ~~TRAFFIC~~ TRADE OFF IS QUALITY OF LIFE. TO ILLUSTRATE THE COMPLETE LACK OF REGARD FOR HUMAN LIFE, FOR THE ROUTE WILL IMPINGE PROFOUNDLY ON THE HIGH SCHOOL CLARK SLUM & THE MIDDLE SCHOOL. THIS SAYS TO ME "Revenue is more important than human learning the biologic safety and SANCTITY OF THE PEOPLE WHO LIVE HERE" **OVER PLEASE.....** MY OBJECTION IS THAT PRINCIPALLY THE BYPASS IS WRONG.

1

1. Chapter 4 of this Final EIS addresses impacts and mitigation measures for school facilities in the project area. The City has also met with the School District and agreed to consider their needs in designing the proposed project.

*We must have your contact information for your comments to be considered in the final environmental impact statement.*

Name M. DIANE DE GRASSE

Address 2416 SQUAK MT LOOP

City ISSAQUAH State WA Zip 98029

Phone (optional) 425-391-5370 E-mail (optional)

Return to  
**Bob Brock, Public Works Director, City of Issaquah,**  
**PO Box 1307, Issaquah, WA 98027**  
*no later than July 30, 2004*



CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH  
BYPASS

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1:30  
P.M.

## COMMENT FORM

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### SE Issaquah Bypass Draft Supplemental Environmental Impact Statement Comments

Since the County has stated that expansion should be to the north rather than the south, talk about By Pass would seem to be idle nonsense. However there are conditions that cry out for attention. Air quality, for one. Driving off the Hobart Road some five miles south of Issaquah village, we endure many days within which polluted air comes up the valley from Tacoma ~~making~~ causing severe discomfort and dangerous health conditions. Widening Hobart Road would lead to denser traffic causing worse conditions vis-a-vis traffic & air quality. NO BYPASS!!

OVER PLEASE.....

1

1. The SE Bypass SDEIS discusses the potential land use impacts of the SE Bypass including encouraging additional development in rural areas of King County. The Bypass is a 1.1 mile limited access road in Issaquah that would not change the road capacity or accessibility south of City limits, and changes to land use plans and zoning that are prerequisites for allowing increased density over that which is presently permitted, would require separate environmental review and approval by the respective jurisdiction.

2

2. Air quality impacts under Alternative 5/Modified Alternative 5 are addressed in Chapter 3 of this FEIS. The proposed project is not expected to result in adverse impacts on air quality. There are no current plans to widen the Issaquah-Hobart Road.

Lined area for handwritten comments.

We must have your contact information for your comments to be considered in the final environmental impact statement.

Name Edward Leahy

Address 13737 240<sup>th</sup> Ave. SE

City Issaquah State WA Zip 98027

Phone (optional) 425-392-2190 E-mail (optional) \_\_\_\_\_

Return to  
**Bob Brock, Public Works Director, City of Issaquah,  
PO Box 1307, Issaquah, WA 98027  
no later than July 30, 2004**





CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH  
BYPASS

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### SE Issaquah Bypass Draft Supplemental Environmental Impact Statement Comments

I have lived for 30 years just off the Holcomb Rd. The air quality in this valley is noticeably poor. The EIS does not address this issue adequately. The Bypass would increase the traffic in our valley and would also include more trucks. There are times now when the air is too foul to breathe. What is our future? Would high school sports have to be confined to the gym?

Another concern is noise, both here at home and in Issaquah. There is no mention of potential noise pollution from heavier traffic + more trucks. Current walls lower noise and would make downtown Issaquah undesirable, to say nothing of the schools.

I don't see any reference to the aesthetics of the Bypass. Current walls are hideous. Do we really want Issaquah to

OVER PLEASE.....

1. The air quality analysis follows WSDOT policy and guidelines relating to National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA). The complete Environmental Procedures Manual can be found at the following website:

<http://www.wsdot.wa.gov/fasc/EngineeringPublications/Manuals/EPM/EPM.htm>

1

2. Potential impacts from noise under Alternative 5/Modified Alternative 5 are addressed in Chapter 3 of this FEIS. Noise analysis does not indicate that substantial noise impacts would result from the proposed project.

2

3. Visual quality impacts and mitigation measures are addressed in Chapter 3 of this FEIS. Sidewalks and pedestrian crossings would maintain access to Tiger Mountain.

3

look as though it is fenced anyone from one of its Alps? My mental picture is that of Osmond walking itself away from the world. Ugly.

The No Bypass alternative is not seriously considered in that it does not address the various improvements that could be made to the existing roads such as widening Sub Ave. & Newport (slay or building a parking garage downtown. The lower level of the library parking lot is generally empty. Do people know it is there? How about a tunnel under I-90? Do these omissions indicate that the Bypass is a foregone conclusion?

Before anything is done, statistics should be brought up to date. The Summit Interchange has made a positive difference. The County does not want heavy development in the Hobart valley. Growth is to the North, not the South. There is no consideration in the SDS for the comfort & lifestyles of existing residents beyond some dreamer's idea of easing traffic congestion at any cost.

I've been here a long time & seen many changes.

NO BYPASS

We must have your contact information for your comments to be considered in the final environmental impact statement.

Name CONSTANCE D. LEAHY

Address 13737 - 240<sup>th</sup> Ave SE

City ISSAQUAH State WA Zip 98027

Phone (optional) 425-392-2190 E-mail (optional)

Return to

Bob Brock, Public Works Director, City of Issaquah,  
PO Box 1307, Issaquah, WA 98027  
no later than July 30, 2004

3

4

4. Modified Alternative 5 was chosen as the preferred alternative because it is the only build alternative that has impacts that can be effectively mitigated. The other build alternatives considered in the DSEIS would have impacts that were considered unacceptable. Please refer to the Concurrence Point 3 Packet for discussion on the project preferred alternative, Modified Alternative 5.

5

5. and 6. Your comments have been noted and will be considered in the City's decision for this project.

6





CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH  
BYPASS

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**SE Issaquah Bypass  
Draft Supplemental Environmental Impact Statement Comments**

I'm set against, but alternative 1, 3, 5.  
only, I could except.

I do want you to know No Freeway.  
Alternative 2, 3, 4, 6, I do not like the  
culverts in front of my house.

Nicki Russett

1010 2nd ave SE

ISSAQUAH, WA 98027

OVER PLEASE.....

1

1. . Modified Alternative 5 was chosen as the preferred alternative because it is the only build alternative that has impacts that can be effectively mitigated. The other build alternatives considered in the DSEIS would have impacts considered that were considered unacceptable.

Lined area for handwritten comments.

We must have your contact information for your comments to be considered in the final environmental impact statement.

Name Vickie Russell

Address 1010 2nd ave SE

City Issaquah, State WA Zip 98027

Phone (optional) 425-369-1410 E-mail (optional) \_\_\_\_\_

Return to  
Bob Brock, Public Works Director, City of Issaquah,  
PO Box 1307, Issaquah, WA 98027  
no later than July 30, 2004



**CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH  
BYPASS**

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### SE Issaquah Bypass Draft Supplemental Environmental Impact Statement Comments

Having reviewed the DSEIS I find that it fails in some areas:

- It fails to adequately consider some crucial aquifer and watershed issues. For example it fails to consider the current aquifer recharge and flood management value of the existing forested slopes that this project will remove. This second growth area contains many trees exceeding 20 inches in diameter. A single 18" diameter Douglas fir, according to WA DNR, Forestry, can hold 250 gallons - one ton - of water. It is unmatched for flood management and aquifer recharge value. The DSEIS also fails to consider the very high failure rate for wetland "mitigation." As a citizen involved with monitoring at one of these mitigation sites, I recorded

OVER PLEASE.....

1

1. Potential impacts on the Lower Issaquah Valley aquifer were addressed in the SDEIS and are further addressed in the water quality discussion in Chapter 3 of this FEIS. Modified Alternative 5 is expected to result in a 0.10 percent (1/1000) reduction in the total recharge volume of the Lower Issaquah Valley aquifer. If additional testing confirms the infiltration potential of proposed stormwater ponds, no reduction in aquifer recharge would be expected because nearly all runoff from the proposed roadway would be infiltrated.

2

2. Additional wetland mitigation is being proposed for Modified Alternative 5 as identified in Chapter 3 of this Final EIS. In addition, a new Conceptual Mitigation Plan to address wetland impacts is provided with this FEIS.

data and did reported controlled observations that support this claim of high failure rate.

- The SDEIS fails to address vehicular emissions known to be harmful, such as ozone and small (2.5) particulates. The bypass creates an avenue for a heavy additional traffic load within the limited confines of the Issaquah Basin. Gross inadequacy here.

- Traffic projections fail to take into account the completion of Highway 8, which is underway and will divert traffic that now turns onto Hobart Road.

- The SDEIS makes confusing projections about noise levels that defy common sense and current observations of the impact to noise following construction of the Sunset Interchange.

- The SDEIS assumes a reliance on practices used for the Sunset Interchange and Issaquah Highlands, without taking into account failures, costs, and lessons learned from these projects.

- The SDEIS fails to consider the more direct and far less damaging use of Second Avenue and Sunset Way.

Thank you for your consideration.

We must have your contact information for your comments to be considered in the final environmental impact statement.

Name Patricia J. Duke

Address 375 SE Croton LN

City Issaquah

State WA

Zip 98027

Phone (optional)

E-mail (optional)

Return to

**Bob Brock, Public Works Director, City of Issaquah,  
PO Box 1307, Issaquah, WA 98027  
no later than July 30, 2004**

3

3. The air quality analysis follows WSDOT policy and guidelines relating to National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA). The complete Environmental Procedures Manual can be found at the following website:

<http://www.wsdot.wa.gov/fasc/EngineeringPublications/Manuals/EPM/EPM.htm>

4

4. The traffic analysis considers roadway improvements appropriate for the proposed project area.

5

5. Potential noise analysis follows appropriate state and federal guidelines, including acceptable projections of noise volumes expected from the proposed project. Mitigation measures would be provided to address potential impacts during construction.

6

6. The SE Bypass project would be constructed following appropriate federal, state and local regulations and standards. Site-specific conditions would determine construction techniques for the SE Bypass since geologic variability in the area is high and it would not be appropriate to compare conditions in the SE Bypass project area with those in the Issaquah Highlands and Sunset interchange project areas.

7

7. Mitigation measures are considered for the No Action alternative in the SDEIS. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but are not reasonable because they are not effective in reducing congestion.



CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH  
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**SE Issaquah Bypass  
Draft Supplemental Environmental Impact Statement Comments**

THE EIS IS A WELL DONE DOCUMENT THAT  
HELPS US DECIDE THE BEST PROCESS.  
WE ALL KNOW THAT IT IS USED AS A DODGE  
TO SAY THAT "I LIVE HERE BUT I DO NOT  
WANT MORE PEOPLE NOW THAT I AM HERE."  
WE HAVE FOUND A WAY TO STAGNATE  
THE CREATIVE PEOPLE AND STOP THE PROCESS.  
THEY USE THE STUDIES TO SLOW &  
RAISE THE COSTS AND THEN COMPLAIN ABOUT  
THE EXCESSIVE COSTS. THE SUNSET  
INTERCHANGE IS THE START OF THE GOAL

OVER PLEASE.....

PLANNING. Growth Happens, if we  
keep our heads in the sand it will  
happen w/out GOOD PLANNING. This  
is a small part of PLANNING for  
our city. WE must continue GOOD  
PLANNING and NOT let Naysayers to  
hold up that PROCESS. Please accept  
this document, use it & proceed w/the  
"Connector" (Bypass)

1

1. The City has received your letter and appreciates your input.

We must have your contact information for your comments to be considered in the final environmental impact statement.

Name Riky Shirey

Address 230 NE Juniper

City ISSA. State WA Zip 98027

Phone (optional) 425-427-1300 E-mail (optional) ricky@shireycontracting.com

Return to

Bob Brock, Public Works Director, City of Issaquah,  
PO Box 1307, Issaquah, WA 98027  
no later than July 30, 2004





CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH  
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### SE Issaquah Bypass Draft Supplemental Environmental Impact Statement Comments

SE. bypass is the most effective step that exists  
to alleviate traffic getting through Issaquah. It should  
not be abandoned because it does not fix everything.  
The city should press forward with all steps possible  
and it would be irresponsible to ignore the most effective  
fix.  
How do the residents of Issaquah feel about the bypass?  
This was a key issue in Russel Toole's race for a seat on  
the city council. His opposition had a strong no bypass  
position and lost hands down.  
The use of Second Avenue as a Bypass will work off  
my neighbor hood, the neighborhood between 2nd and Sunset.  
**OVER PLEASE.....**

Lined area for handwritten comments.

We must have your contact information for your comments to be considered in the final environmental impact statement.

Name William V Erisinger

Address 415 SE Birch St

City Issaquah State WA Zip 98027

Phone (optional) 425-392-5797 E-mail (optional) bill@Erisinger.net

Return to  
**Bob Brock, Public Works Director, City of Issaquah,**  
**PO Box 1307, Issaquah, WA 98027**  
**no later than July 30, 2004**

#50





**CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH  
BYPASS**

**COMMENT FORM**

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**SE Issaquah Bypass  
Draft Supplemental Environmental Impact Statement Comments**

I am in Support of the SE By Pass-

Please Accept the SDEIS AND move  
this Project forward now.

Storm water improvements -

cleaner air -

improved People flow + traffic

Better access to our down town businesses.

**OVER PLEASE.....**

Lined area for handwritten comments.

We must have your contact information for your comments to be considered in the final environmental impact statement.

Name Bryan Keller

Address 4602-239th Ave SE

City ISSAQUAH State WA Zip 98029

Phone (optional) 4. 882-4849 E-mail (optional) bryan@strategicpartnersllc.net

Return to  
Bob Brock, Public Works Director, City of Issaquah,  
PO Box 1307, Issaquah, WA 98027  
no later than July 30, 2004



CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH  
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**SE Issaquah Bypass  
Draft Supplemental Environmental Impact Statement Comments**

Hi,

I live off May Valley Road. For a commute issue that lasts only an hour or so in the morning & then again at night, the costs & the long term impact on so many things that make Issaquah wonderful seems without basis & truly irresponsible. I don't call this progress.

OVER PLEASE.....

1

1. The City has received your letter and appreciates your input.





CITY OF ISSAQUAH  
**SOUTHEAST ISSAQUAH  
BYPASS**

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10:25 am

**COMMENT FORM**

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**SE Issaquah Bypass  
Draft Supplemental Environmental Impact Statement Comments**

SEE ATTACHED;

FROM DAN LAMANUZZI

940 2ND AVE SE

ISSAQUAH, WA 98027

NOTE: I plan to submit a

significantly larger document

before July 30th

OVER PLEASE.....

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*We must have your contact information for your comments to be considered in the final environmental impact statement.*

**Name** \_\_\_\_\_

**Address** \_\_\_\_\_

**City** \_\_\_\_\_ **State** \_\_\_\_\_ **Zip** \_\_\_\_\_

**Phone** (optional) \_\_\_\_\_ **E-mail** (optional) \_\_\_\_\_

Return to  
**Bob Brock, Public Works Director, City of Issaquah,  
PO Box 1307, Issaquah, WA 98027  
no later than July 30, 2004**



CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH  
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SE Issaquah Bypass  
Draft Supplemental Environmental Impact Statement Comments

TO: BOB BROCK

FROM: SCOTT WETSS

RE: COMMENT FORMS - SEE ATTACHED

FAX #: 425-837-3409

PAGES: 3

OVER PLEASE.....

CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH  
BYPASS

**COMMENT FORM**

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**SE Issaquah Bypass**

**Draft Supplemental Environmental Impact Statement Comments**

My comments at this time are strictly regarding the Draft Supplemental Environmental Impact Statement. It is my opinion that this document has become outdated and does not truly reflect the situation or conditions in Issaquah at this time. With statistics backing this document being from 1996 how can anyone make an informed decision about our future? Since the opening of the Sunset Interchange, traffic in Issaquah has lessened substantially. Perhaps not for those during the morning and evening peak hours who are just traveling north and south through town on Front Street, but definitely for those of us who live in town and travel on several of the side streets.

While the DSEIS reflects information concerning the build and no-build options through the year 2030, with information available from 1996, this document is not taking into consideration any other viable alternatives that have either been implemented or may be implemented in the future.

As demonstrated by Adam Behringer, at the above mentioned public meeting, the statistics presented by the DSEIS do not reflect any significant changes in our traffic situation should this bypass be constructed. Further it has been confirmed by David Irons, again at the above mentioned public meeting, that King County has no interest in widening the Hobart Road and therefore, any bypass to Front Street

1

1. Only existing conditions data are from earlier years. Future year traffic modeling did account for opening of I-90 Sunset Interchange and potential traffic patterns based on that modeling were reflected in traffic volumes and other data provided in the SDEIS.

2

2. The DSEIS included updated traffic modeling for the year 2030 and which includes consideration of other planned development in the project vicinity and is not based only on previous data. Updated traffic information for a proposed 2010 year of opening is provided in Chapter 2 of this Final EIS. The proposed project is intended to address congestion along the Front Street corridor and access to I-90. It has been acknowledged that other actions may be taken to address traffic issues elsewhere in the city and that the proposed project represents only one measure to improve mobility in the southeastern portion of the city.

3

3. Comments noted. Traffic data for the proposed project indicate that Modified Alternative 5 would substantially improve operations for north-south travel conditions and accessibility to I-90 from Front Street and the proposed SE Bypass roadway.



will not be eliminating or even alleviating our traffic situation, but would instead just be moving the traffic bottleneck from the I-90/Front Street intersection to south of the 2<sup>nd</sup> and Front Street intersection.

Before we go to a \$40million dollar project, why don't we spend a few thousand dollars to lower the speed limit on the Issaquah-Hobart Road so that more pass-through commuters will prefer the I-90/Highway 18 existing bypass. I see no reason to totally change our towns environmental habitat to pacify South County residents.

Of better assistance to alleviate our traffic woes would be to buy in to the County completion of Highway 18 improvements, widening Newport Way to include a turn lane, creating a third I-90 crossing to pull traffic from the SR-900/I-90 and Front Street/I-90 intersections and finally working with the County on improvements to SR900. It is only a matter of time before the eastside is going to have to consider mass transit, so let us look into preparing for that. These ideas would be much better use of the taxpayers dollars.

This document also does not address the devaluation of Olde Town Issaquah property resulting from the development of the bypass. How are properties in old Issaquah (that do not even have stormwater drains installed) supposed to deal with resulting water and noise problems. While it is easy to talk about stormwater and noise mitigation, what would be the cost of that to the City? This document does not address these costs.

I think that monies that would be spent on the bypass would be better spent on mass transit or some other form of public transportation.

We must have your contact information for your comments to be considered in the final environmental impact statement.

Name DALE ANDERSON

Address 405 SE BUSH STREET

City ISSAQUAH State WASHINGTON Zip 98027

Phone (optional) 425-392-2903 E-mail (optional) ANDERSN3@COVAD.NET

4

4. The proposed project's northern area would occur at the northeastern boundary of the Olde Town neighborhood, while most of the remaining project area is outside this neighborhood. Therefore, few direct impacts on Olde Town are expected to occur. Noise measurements taken near East Sunset Way indicate that a 2 decibel increase in noise levels would occur as a result of the proposed project. At this level, the increase in noise for residents there would be minimal. The proposed project would include stormwater mitigation measures during construction and new stormwater facilities would be provided to address runoff associated with the proposed roadway. A new stormwater pond is proposed at the east end of East Sunset Way. With mitigation, no substantial stormwater impacts are expected to occur in the Olde Town neighborhood area.

Daniel P. Lamanuzzi

940 2<sup>nd</sup> Ave SE

Issaquah, WA 98027

## Issaquah South East Bypass

### Issues and Discrepancies

Dan Lamanuzzi

940 2<sup>nd</sup> Avenue SE

Issaquah, WA 98027

RECEIVED  
JUL 30 2004

PUBLIC WORKS ENG.  
9:30 a.m.

#### Introduction:

Please note, I am a home owner in the proposed affected area and I am a very accomplished Engineer and Consultant with over 30 years of experience with multimillion dollar design and development projects involving state-of-the-art technologies and "first in the world" medical products. My review and approval of the details of these projects is required before they can be released. As an experienced analytical design and reviewing Engineer, Consultant, and Technical Manager, I am well qualified to review and critique the DSEIS and proposal.

### Chapter 1 Purpose of and Need for the Action

During preparation of the June 2000 Draft Environmental Impact Statement (DEIS), representatives from a number of state and federal agencies worked with the City of Issaquah to develop a Purpose and Need statement for the Southeast Issaquah Bypass project. The Purpose and Need statement is one of the first and most important steps in the environmental documentation process for a transportation project subject to the procedural requirements of the National Environmental Policy Act (NEPA). The Purpose and Need statement should clearly and concisely describe the problems the proposed project is intended to correct and summarize the problems that would likely continue or worsen if the project is not implemented. The following paragraph is the formal Purpose and Need statement for the Southeast Issaquah Bypass project.

*"The need for the proposed project is the result of existing traffic volumes on city streets, and the necessity to increase mobility by reducing congestion and improving access to I-90. The purpose of the proposed project is to resolve these problems by reducing traffic volumes that are causing the two existing interchanges, and the Front Street corridor, to be overburdened."*

In addition to the formal Purpose and Need statement, the Federal Highway Administration (FHWA) requires a thorough discussion of a proposed project's Purpose and Need in the introductory chapter of the EIS. The Purpose and Need chapter should clearly demonstrate the need for the proposed project and justify the resulting impacts. It should address a variety of transportation issues (including existing and projected travel demand) and explain how travel demand translates into traffic, capacity, and safety needs, and needs for alternative transportation modes (i.e., transit, bicycles, and pedestrians). The following sections describe in more detail the Purpose and Need for the Southeast Issaquah Bypass project.

#### Purpose of the Proposed Action

The Southeast Issaquah Bypass project would create a new north/south arterial roadway between Interstate 90 (I-90) and Front Street South in Issaquah, Washington (see Figure S-1 in the preceding *Summary* chapter). The new roadway would relieve existing traffic congestion on Front Street South through downtown Issaquah and provide improved mobility throughout the eastern portions of the city. The proposed project would increase the capacity of the local road network, improve the existing level of service consistent with the city's comprehensive plan, provide an important new link in the regional roadway system, and promote multi-modal transportation options by including pedestrian, bicycle, and recreational trail connections.

This project would reduce existing and future levels of congestion on Front Street South because traffic currently passing through downtown Issaquah could use the Southeast Issaquah Bypass as an alternate route between I-90 and points south of the city. A portion of the trips that now use Southeast Newport Way for access to and from I-90 could be expected to shift to the Southeast Issaquah Bypass. Traffic on East Sunset Way would also be expected to decrease because the new bypass would provide an alternate route between areas north and south of I-90. The new arterial may also result in fewer future trips on other north/south arterials such as Front Street South and 2<sup>nd</sup> Avenue Southeast.

Southeast Issaquah Bypass  
Draft Supplemental EIS

Chapter 1

Page 1-1

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**Issaquah South East Bypass****Issues and Discrepancies**

Table 2-6  
Summary of Intersection LOS and Delay for Various Scenarios

EIS Alternatives and Forecast Years			Intersection Name																	
Forecast Year	SPAR	Southeast Issaquah Bypass		FrontWB Ramps	FrontEB Ramps	FrontGliman	FrontDogwood	FrontSunset	FrontClark	SunsetWB Ramps	SunsetEB Ramps	SE Bypass/Sunset	SE Bypass/ Park Pointe Access	SE Bypass/Front (South C)	SE Bypass/Front (South A)	Iss-Hobart/ May Valley Rd.	Sunset2nd SE	Bush2nd SE	Front2nd SE	
Year 2000: Existing	No Build	No Build	AM	>80	F	C	B	C	20	NA	NA	NA	NA	NA	NA	NA	NA	A	A	F
			PM	>80	F	E	B	C	30	NA	NA	NA	NA	NA	NA	NA	NA	A	A	B
Year 2005: No Action	Build	No Build	AM	C	B	E	A	C	F	A	B	NA	NA	NA	NA	NA	F	B	B	F
			PM	29	15	72	10	22	>80	8	17	NA	NA	NA	NA	NA	F	11	11	>80
Year 2005: Build	Build	Build	AM	57	57	>80	43	27	33	C	A	B	NA	NA	NA	NA	F	C	C	C
			PM	D	E	F	B	19	B	B	A	B	12	18	A	B	17	C	29	>80
Year 2030: No Action	Build	No Build	AM	29	20	D	B	C	D	B	15	16	A	B	C	B	F	A	A	A
			PM	53	75	>80	12	19	17	B	12	18	A	B	12	B	17	C	5	4
Year 2030: Build	Build	Build	AM	22	22	>80	71	>80	>80	12	6	NA	NA	NA	NA	NA	F	C	B	F
			PM	47	>80	>80	41	31	>80	53	>80	F	NA	NA	NA	NA	F	29	14	>80
Year 2030: Build	Build	Build	AM	D	C	E	D	E	E	B	B	C	D	B	D	F	F	A	A	C
			PM	46	27	69	4	60	73	14	12	22	38	19	F	A	A	4	25	25
Year 2030: Build	Build	Build	AM	52	>80	>80	12	12	>80	C	D	F	>80	>80	>80	F	F	5	3	C
			PM	D	F	F	>80	12	12	>80	C	D	F	>80	>80	>80	F	5	3	C

Notes: For signal controlled intersection  
 - unsignalized intersection  
 - Applicable to South A Alignment

Southeast Issaquah Bypass  
 Draft Supplemental EIS

Actual data for 2005 & 2030 shows South A to be the consistently significantly better alternative.

The proposed SE Bypass fails to meet the stated purpose of the project and fails to mitigate the main issues which are stated as the need for the project. On this basis alone, this project needs to be stopped and the tax payer's money put to use to implement the many NO BUILD alternative improvements for traffic flow in Issaquah.

This data is not correct and is at best misleading. This data would indicate that South A is less effective than South C in the PM hours, however, the actual data and summary from the Technical Report shows that the opposite is true. This data has either purposely been manipulated in order to give the appearance South A is not significantly better than South C, or it is at least an incredibly poor and critically flawed technical report.

This data does not reflect the actual existing conditions after the construction of the Sunset Interchange. Actual conditions are GREATLY improved over the data shown. I demand that current data be used for all charts and calculations within the DSEIS.

1. Please see response to Lamanuzzi Comment, Page 216.

2. The purpose and need for the project has not changed while the project has been under consideration. Modified Alternative 5 was chosen as the preferred alternative because it is the only build alternative that has impacts that can be effectively mitigated. The other build alternatives considered in the DSEIS would have impacts considered unacceptable. Please see Chapter 2 of this FEIS for more information on the selection of the project preferred alternative, Modified Alternative 5.

3. The data suggests that traffic operations for both South C and South A are similar. The South A Alignment is now the preferred alignment.

4. When the scope of the project was developed, the Sunset Interchange was not in place and therefore no existing traffic data was available.

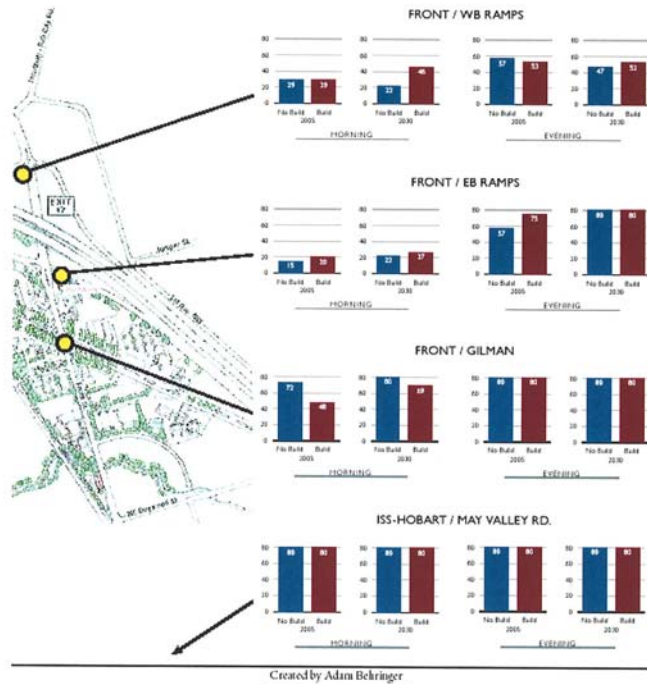
Daniel P. Lamanuzzi

940 2<sup>nd</sup> Ave SE

Issaquah, WA 98027

## Issaquah South East Bypass

### Issues and Discrepancies



**The proposed SE Bypass project simply fails to meet the objectives and purpose for the project and absolutely does not provide any significant benefit which would warrant the excessive costs and major negative impacts to the environment and community.**

# **Issaquah South East Bypass** **Issues and Discrepancies**

Table 2-7  
Front Street Intersections: Year 2005 and 2030 AM Peak Hour LOS and Delay

	No Action Scenario		Build Scenario*	
	Year 2005	Year 2030	Year 2005	Year 2030
Front/WB I-90 Ramps	LOS C 29 sec/veh	LOS C 22 sec/veh	LOS C 29 sec/veh	LOS D 46 sec/veh
Front/EB I-90 Ramps	LOS B 15 sec/veh	LOS C 22 sec/veh	LOS B 20 sec/veh	LOS C 27 sec/veh
Front/Gilman	LOS E 72 sec/veh	LOS F >80 sec/veh	LOS D 48 sec/veh	LOS E 60 sec/veh
Front/Dogwood	LOS A 10 sec/veh	LOS F 71 sec/veh	LOS B 13 sec/veh	LOS E 49 sec/veh
Front/Sunset	LOS C 22 sec/veh	LOS F 81 sec/veh	LOS C 25 sec/veh	LOS E 60 sec/veh
Front/Clark	LOS F >80 sec/veh	LOS F 81 sec/veh	LOS D 41 sec/veh	LOS E 73 sec/veh

\* Results are the same for both South A and Build Scenario Alignment Alternatives

Fails to improve access to I-90

Table 2-8  
Front Street Intersections: Year 2005 and 2030 PM Peak Hour LOS and Delay

	No Action Scenario		Build Scenario	
	Year 2005	Year 2030	Year 2005	Year 2030
Front/WB I-90 Ramps	LOS E 57 sec/veh	LOS D 47 sec/veh	LOS D 53 sec/veh	LOS D 52 sec/veh
Front/EB I-90 Ramps	LOS E 57 sec/veh	LOS F >80 sec/veh	LOS E 75 sec/veh	LOS F >80 sec/veh
Front/Gilman	LOS F >80 sec/veh	LOS F >80 sec/veh	LOS F >80 sec/veh	LOS F >80 sec/veh
Front/Dogwood	LOS D 43 sec/veh	LOS D 41 sec/veh	LOS B 12 sec/veh	LOS A 9 sec/veh
Front/Sunset	LOS C 27 sec/veh	LOS C 31 sec/veh	LOS B 19 sec/veh	LOS B 12 sec/veh
Front/Clark	LOS C 33 sec/veh	LOS F 81 sec/veh	LOS B 17 sec/veh	LOS B 12 sec/veh

Fails to improve access to I-90 and fails to reduce congestion at Front and Gilman

5

5. In the Build Scenario, more North-South traffic volume traverses Front St (over the No-Action Alternative) and has access to I-90. In addition, north-south traffic on the SE Bypass would also have access to I-90. The Build Scenario greatly improves accessibility to I-90 from both Front St & SE Bypass.

6

6. By the year 2030, traffic volumes will increase within the Study area with or without the SE Bypass. The Build Scenario provides improved operations for North-South traffic as well as improved I-90 accessibility both from Front St. and the SE Bypass.



**Issaquah South East Bypass**  
**Issues and Discrepancies**

Future traffic cycle lengths were estimated for the year 2005 as follows:

Downtown Area (Front Street, Southeast Bypass, 2nd Avenue, Sunset Way)

No Action:

AM Peak Hour = 45-110; PM Peak Hour = 45-100

Build Scenario:

AM Peak Hour = 55-120; PM Peak Hour = 60-120

East Lake Sammamish

No Action:

AM Peak Hour = 70-110; PM Peak Hour = 100-120

Build Scenario:

AM Peak Hour = 70-120; PM Peak Hour = 100-120

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Transportation  
Technical Report

Southeast Issaquah Bypass  
Draft Supplemental EIS

Traffic cycle times increase in the year 2005 if the bypass is built. Why are you considering this any further. Stop wasting the tax payers money.

Significant reduction in volumes along Front Street is anticipated with the inclusion of the SE Bypass Road as compared to without the SE Bypass Road. However, the average vehicle delay for the EB I-90 intersection with Front Street increases over the No Action for both the AM and PM peak hours. Although overall volumes on Front Street are reduced with the inclusion of the SE Bypass Road, there is an increase in volumes at the intersection of WB 90 I-90 ramps and Front Street. For those vehicles destined north on East Lake Sammamish Parkway from points south of Issaquah, the travel would suggest that a portion may use the Southeast Bypass to bypass congestion on Front Street and then exit at the Front Street interchange to access East Lake Sammamish Parkway. This diversion pattern results in an increase in volumes at the Front Street intersection and in a slightly higher delay at this location for the Build Scenario as compared to than the No Action Scenario. However, its impact on mainline operation is projected to be negligible.

EIS specifically states that the SE Bypass does not improve traffic flow at the Front and I90 interchange ... if fact it makes things worse!!! So again, why are you continuing to waste the tax payers money!!!?

7

7. The range of cycle lengths is generally the same between No-Build and Build scenarios. Given the change in traffic patterns in the Build Scenario, slight modification in cycle length should be anticipated.

8

8. Traffic data for the proposed project indicate that Modified Alternative 5 would substantially improve operations for north-south travel conditions and accessibility to I-90 from Front Street and the proposed SE Bypass roadway.

**Issaquah South East Bypass**  
**Issues and Discrepancies**

Future traffic cycle lengths were estimated for the year 2030 as follows:

Downtown Area (Front Street, Southeast Bypass, 2nd Avenue, Sunset Way)

No Action:

AM Peak Hour = 55-100; PM Peak Hour = 60-150

Build Scenario:

AM Peak Hour = 60-160; PM Peak Hour = 100-140

East Lake Sammamish

No Action:

AM Peak Hour = 65-100; PM Peak Hour = 90-130

Build Scenario:

AM Peak Hour = 90-100; PM Peak Hour = 90-130

50

Transportation  
Technical Report

SE

Bypass  
EIS

Traffic cycle times increase in the year 2030 if the bypass is built. Why are you considering this any further. Stop wasting the tax payers money.

Table 16. Year 2005 Intersection Operations along Front Street

	Front Street Intersections: Year 2005 LOS & Delay			
	No Action Scenario		Build Scenario*	
	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
Front/WB I-90 Ramps	LOS C 29 sec/veh	LOS E 57 sec/veh	LOS C 29 sec/veh	LOS D 53 sec/veh
Front/EB I-90 Ramps	LOS B 15 sec/veh	LOS E 57 sec/veh	LOS B 20 sec/veh	LOS E 75 sec/veh
Front/Gilman	LOS E 72 sec/veh	LOS F >80 sec/veh	LOS D 48 sec/veh	LOS F >80 sec/veh
Front/Dogwood	LOS A 10 sec/veh	LOS D 43 sec/veh	LOS B 13 sec/veh	LOS B 12 sec/veh
Front/Sunset	LOS C 22 sec/veh	LOS C 27 sec/veh	LOS C 25 sec/veh	LOS B 19 sec/veh

EIS data shows that the LOS and Delay times at major intersections are not significantly improved with the bypass, but instead, in many cases the delays times increase ... So again, why are you continuing to waste the tax payers money!!!!

9

9. The range of cycle lengths is generally the same between the No-Build and Build scenario. Given the change in traffic patterns in the Build Scenario, slight modification in cycle length should be anticipated.

10

10. Traffic data for the proposed project indicate that Modified Alternative 5 would substantially improve operations for north-south travel conditions and accessibility to I-90 from Front Street and the proposed SE Bypass roadway.

**Issaquah South East Bypass**

**Issues and Discrepancies**

The DSEIS is critically flawed and fails to meet the project's stated purpose and need, and fails to do justice to the tax payers, citizens, residence of Issaquah;

- ❑ **FAILS** based on the criteria of Section 4(f) for Alternative Analysis (Chapter 5 pages 30 through 32)
- **The report fails to assess** the NO BUILD **plus Improvements** Alternatives, most of which do **not use Section 4(f) resources**.
  - **When compared to** the NO BUILD **plus Improvements** Alternatives, the present DSEIS proposal for the South C Alignment **Fails** the criteria specified in **Section 4(f)** An alternative may be rejected as not being feasible and prudent for any of the following reasons:
    - **It does not meet the project's stated "purpose and need";**
    - **It involves excessive construction costs;**
    - **It creates severe operational & safety problems;**
    - **It results in unacceptable social, economic & environmental impacts;**
    - **It creates serious community disruption; or**
    - **It results in an accumulation of a lesser magnitude of the previous factors**
- ❑ And ..... It Uses Section 4(f) resources

**The only acceptable Alternative is the  
"NO BUILD" with Improvements  
Alternative!!**

Table 5-1  
Section 4(f) Alternatives Analysis Summary

Alternative	Feasible and Prudent?	Uses Section 4(f) Land?	Relative "Net Harm" After Mitigation
1	No	No (N/A*)	N/A
2	No	Yes (N/A*)	N/A
3	No	Yes (N/A*)	N/A
4	No	Yes (N/A*)	N/A
5	No	Yes (N/A*)	N/A
6	No	Yes (N/A*)	N/A
7 (No Action Build + No Action)	No	No	N/A
<b>8 (No Build + Action)</b>	<b>Yes</b>	<b>No</b>	<b>Lowest</b>

\*N/A – Alternatives not feasible and prudent are eliminated from further consideration

- 11 11. Modified Alternative 5 was chosen as the preferred alternative because it is the only build alternative that has impacts that can be effectively mitigated. The other build alternatives considered in the DSEIS would have impacts considered that are considered unacceptable. Please see Chapter 2 of this Final EIS and the Concurrence Point 3 Packet for more discussion of Modified Alternative 5. South A is the selected preferred alternative alignment for the southern portion of the project area. As noted by the FHWA in the CP3 document, "The No-Build alternative is a base line comparison for other alternatives. The No-Build is not an acceptable alternative to meet the Purpose and Need of the Project."



**Issaquah South East Bypass****Issues and Discrepancies****The current study fails to assess and compare all the options:**

In my opinion, any project of this size, nature, cost, social and economic impact needs to assess and compare "ALL" possible options for providing traffic flow improvements, particularly the variety of *NO BUILD* low cost option improvements and present this comparison to the public for their assessment. *NO BUILD* low cost option improvements would have significant positive impact in addressing traffic needs. Most of these *NO BUILD* improvements could be implemented in a relative short time period and play a major role in traffic flow improvement for many years to come, without the need for increased taxes or bonds to the people of Issaquah. Yet, this study does not present, compare, or provide any information regarding these low cost, low social impact options.

It is an engineering travesty that all of these low cost and low social impact alternatives for traffic flow improvement have not been assessed, addressed, and compared in this multimillion dollar study. It is also a travesty and an injustice to the tax payers and property owners that the City Counsel has not previously demanded that these options be made part of this study and "ALL" options be presented to the public.

As a resident, a voter, and a tax payer in the city of Issaquah, I am very concerned that there is an attitude, politically and financially encouraged and motivated, that would foolishly state "since we have spent millions of dollars on studies to this point, "Therefore, We must go forward with a build plan" ... even though the plan is in-effective and in-efficient and ill-advised.

I ask the Counsel to *Have the Courage* to admit that this proposal, particularly with respect to South C Alternative, simply does not work and that the costs of the project are far more disproportionate to the potential improvement gained than would be the implementation of *NO BUILD* improvements. Have the courage to admit that the cost of the studies to date would have already paid for most of the alternative *NO BUILD* traffic improvement options.

I request of the Counsel, that if any further effort toward the implementation of the SE Bypass is done, that it include for public review, all of the *NO BUILD* traffic flow improvement options in a direct side-by-side comparison with the build options. It is my opinion that the tax payers and voters of this area, when provided all of the information, would dramatically oppose the build options.

**Of particular interest is improvements which can easily be made to Front Street itself.**

Traffic flow on Front street could easily and quickly be improved at low cost and low impact with significant positive impacts in reducing waits times and reducing cycle times on the Front street corridor. These improvements can be easily accomplished by;

- Creating easy access off street parking
- Easy access off street parking can be created by using the old railroad track area which run along Rainer Blvd, both east and west of Front Street
- Eliminate Front Street Parking during peak traffic periods
- Eliminate islands/peninsulas along Front street which only act to impede traffic flow and prevent easy turns off of Front street. These are a major part of the problem.
- Create 4 lane traffic flow along Front Street as much as possible
- Create dedicate right hand turn lane at Front Street and Sunset Blvd going south

12

12. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Responses to your suggestions for improvements are contained there. While there may be many alternatives to the proposed project, as suggested in the comments, they are not reasonable because they are not effective in reducing congestion. Nor are they necessarily less expensive, because many of the suggestions would involve considerable cost.

**Issaquah South East Bypass**  
**Issues and Discrepancies**

**The City of Issaquah Public Works & Engineering Department Mislead Me:**

In late 1996 when I was investigating the possible purchase of my current home at 940 2<sup>nd</sup> Ave SE in Issaquah, I spoke with Project Coordinator Pam Fox regarding my concerns over the potential South C Alignment build plan. Pam Fox told me that I had nothing to worry about because that alternative was not going to be considered since it was such a logistically poor traffic flow proposal. Indeed, that alternative was not in the initial Draft EIS study. The Counsel and City of Issaquah Public Works & Engineering Department chose to not study the South C Alternative knowing that it was not worthy of consideration regarding the stated main intent of the project since it is by far the worse logistical traffic flow alternative.

Yet now, the presenters and the City of Issaquah Public Works & Engineering Department would attempt to propose that the South C Alignment is the only viable alternative. Hello ... is anybody listening out there!!!

"Gee ... what fools we were not to consider this viable alternative during the first EIS study and save the tax payers over a million dollars."

The South C Alignment was not worthy of consideration in the first Draft EIS and that alternative still hasn't changed ... It Is Still Not Worthy.

In addition, although the Supplemental EIS study was done to include an alternative that was previously deemed unworthy, yet the study does not address all the NO BUILD low cost options and does not readdress other options which were dropped during the scoping period of the Draft EIS.

Based on the information obtained from the City of Issaquah Public Works & Engineering Department, I purchased the home on 2<sup>nd</sup> Avenue. Since purchasing my home I have spent hundreds of hours and thousands of dollars improving the home. The SE Bypass South C Alternative would dramatically negatively impact all of the homes in the immediate surrounding area of the proposed new intersection of 2<sup>nd</sup> Ave and Front Street regarding items such as;

- Quality of Life
- Standard of Living
- Health & Safety
- Property Value
- Resale Opportunity

Yet, the report fails to properly acknowledge these issues and certainly fails to address any of these issues as they directly relate to my home and the approximate 14 homes in the immediate surrounding area of the proposed new intersection of 2<sup>nd</sup> Ave and Front Street.

Being mislead by the City of Issaquah Public Works & Engineering Department has caused me an incredible amount of unnecessary stress and anxiety which has negatively affected my health. I need to know what the decision is ... I cannot continue to worry and stress over this issue ... you need to decide now .... And you need to immediately address the issues relating to individual homeowners and provide appropriate mitigation and compensation to these homeowners so as not to incur excessive litigation costs.

13

13. South A is the selected preferred alternative alignment for the southern portion of the project area. The No Action Alternative is not expected to result in travel pattern changes in Issaquah, based on projects planned in the City's current transportation improvement program plan. As summarized in Chapter 2, many alternatives to the Southeast Issaquah Bypass were evaluated in detail during project studies. Should the Southeast Issaquah Bypass not be constructed, the City would have to return to the planning process to re-evaluate those alternatives that were rejected in the past. This may require significant changes to the City's transportation policy if other capacity improvement projects, such as widening of Newport Way or Front Street South, are to be considered as viable alternatives having the support of the community. Or, the City can adopt a lower level of service in its transportation system, thereby effectively delaying the need for – and decisions on - future transportation improvements. In all probability, selection of the No Action Alternative will result in deferral of transportation improvements between I-90 and Issaquah-Hobart Road for at least another ten years, which is the time it took for environmental review of the Southeast Issaquah Bypass to be completed. In the meantime, local traffic and through commute traffic would continue to travel along South Front Street and 2<sup>nd</sup> Avenue SE. Over time, increased residential development in Issaquah and unincorporated King County to the south of the city, as allowed under current land use regulations, is expected to increase traffic and congestion along Front Street South. The increased congestion would also continue to further increase the amount of traffic through adjacent residential neighborhoods in an attempt to avoid congestion on the primary arterials.

14

14. South A is the selected preferred alternative alignment for the southern portion of the project area.

**Issaquah South East Bypass****Issues and Discrepancies****Social Impacts**

- The current EIS fails to properly assess and address the social impacts to the citizens, voters, and home owners of the area designated as South C Alignment.
- The SE Bypass proposal significantly impacts the living conditions of the residence in homes in the area around the proposed 2<sup>nd</sup> Ave & Front Street intersection by greatly increasing the noise levels incurred, significantly reducing privacy, increasing risk of injury to elderly and children who live in those homes, and increasing risk of injury to the hundreds of parents, students, and children who would use this new intersection to access the schools in the immediate area, yet the DSEIS does not address this issue.

**Economics**

- The current DSEIS fails to properly assess and address the Economic impacts to the citizens, voters, and home owners of the area designated in the South C Alignment.
- The SE Bypass proposal significantly devalues the homes in the area around the proposed 2<sup>nd</sup> Ave & Front Street intersection, yet the DSEIS does not assess this issue properly or offer any mitigation for this issue
- The significant negative impacts on the homes in the area around the proposed 2<sup>nd</sup> Ave & Front Street intersection will lead to the need to sell these homes and relocate for most of the existing families, yet due to the devaluation of these homes, great losses in property values will be incurred. Due to the forced high traffic volume at this intersection, normal single family homes would become impractical .... Therefore this section should be rezoned for either;
  - High density or,
  - Commercial use ...

If the bypass is approved, this area would be best served by rezoning, and this would also at least allow the local existing residents an opportunity to recoup some of the lost value of their properties.

**Displacement**

- The current DSEIS fails to properly assess and address the issues related to displacement of families and homes. The DSEIS states that with the South C Alignment only 5 homes will need to be displaced.

**Table 4-27****Summary of Displacements by Build Alternative**

Build Alternative	Displacements
Alternative 1	nine residences
Alternative 2	five residences
Alternative 3	ten residences
Alternative 4	six residences
Alternative 5	nine residences
Alternative 6	five residences

Fails to assess the impacts of only a two lane road for the South A Alignment. Issaquah-Hobart Road limits the amount of traffic that can flow and is not planned for expansion. Only a 2 lane bypass should be considered. A 2 lane bypass environmental impacts & impacts to residences will be far less than the DSEIS currently states.

Fails to properly assess the impacts of homes in the immediate area of the proposed new intersection. These homes will not be livable for the current families and will need to be relocated. The DSEIS does not mitigate for this issue.

15

15. South A is the selected preferred alternative alignment for the southern portion of the project area.

16

16. South A is the selected preferred alternative alignment for the southern portion of the project area; the other alternative alignment, South C, was not carried forward in the Final EIS.

17

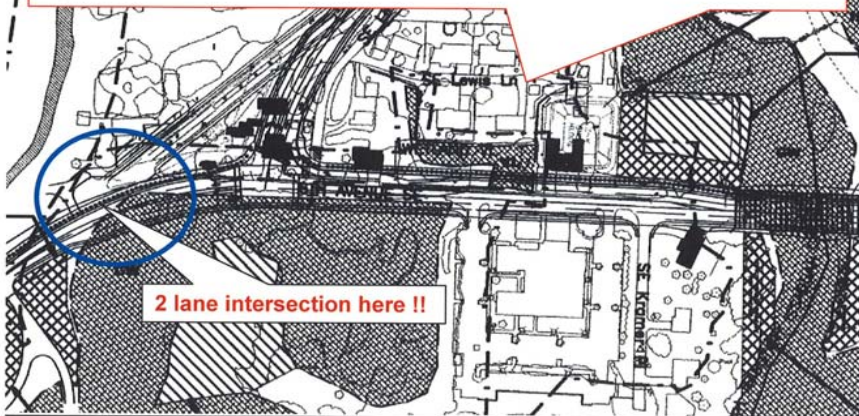
17. After issuance of the SDEIS, modifications were made to Alternative 5 which made this the preferred build Alternative. A four lane road is required by FHWA to be evaluated in the EIS because it was determined to be needed under the 20-year traffic modeling analysis. Although the Preferred Alternative describes a four lane road, the project can be constructed in phases starting with a two lane road.

Impacts to homes were considered in the DSEIS and are also identified for Modified Alternative 5 in Chapter 3 of this FEIS. Up to eight residences would be affected by Modified Alternative 5 and mitigation would be provided in accordance with Uniform Relocation Act regulations. This does not require mitigation for residences that aren't displaced.



**Issaquah South East Bypass****Issues and Discrepancies**

The report fails to address or show the minimal impacts which a 2 lane road would have on the South A Alignment. In the South A Alignment area there is already existing road. By limiting the bypass to only two lanes (since Issaquah-Hobart Road already limits traffic flow by its two lanes) and moving the intersection farther south, the impacts on home displacements could possibly be brought down to **ZERO** in this area, but certainly significantly reduced. The South A Alignment is far more practical anyway, and can have far less negative impact on the community and resources if it were more effectively designed and limited to a two lane road. There simply is no need to displace so many homes in this area.

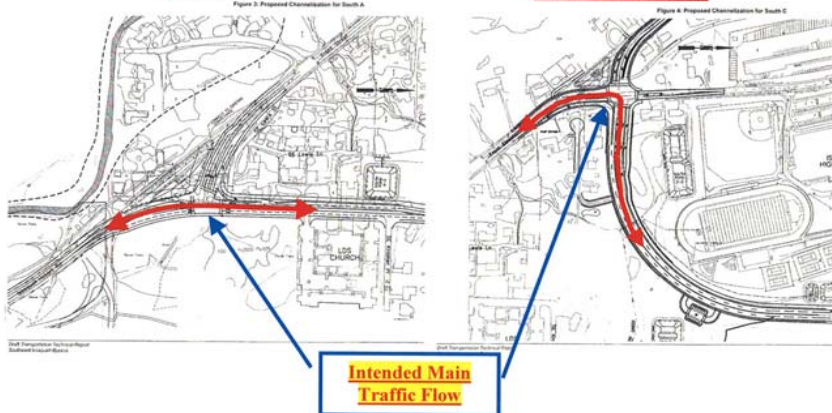


18

18. South A has been selected as preferred alternative alignment for the southern portion of the project area. The EIS evaluated a four lane roadway because the 20-year traffic modeling shows it is needed to meet future traffic demands.

**Issaquah South East Bypass****Issues and Discrepancies****Traffic**

- The model simply doesn't make sense ... I travel on Front street nearly every day for the past nine years at all critical time frames of the day and I just don't have any problem with the traffic flow. THERE IS NO TRAFFIC FLOW PROBLEM on Front Street .... That cannot be significantly improved through a variety of NO BUILD alternative improvements. My typical Northbound and Southbound travel time from 2<sup>nd</sup> Ave and Front Street to Siemens Medical Solutions (~3 miles) is only ~8 to 10 minutes (~24 to 18 miles per hour) including stop lights.
- The DSEIS only shows traffic volumes for peak periods of the day. However, "Major impact to homeowners of the South C Alignment area will be negatively impacted by traffic flows throughout all periods of the day and night. Yet, the DSEIS does not address this issue. We need to see the data of traffic flow/volumes and impact for all hours of the day and night.
- **The South C Alignment simply doesn't make any sense and is completely impractical as a long term or short term traffic flow solution.**

**Obvious Ideal Traffic Flow Option  
South A Alignment****Nightmare Traffic Flow Option  
South C Alignment**

Just look at the proposed flow of traffic for South C Alignment .... "Anyone" can easily determine that this is not a viable or optimal traffic flow plan. According to this plan, north bound traffic would naturally want to continue straight through the intersection and down 2<sup>nd</sup> Ave (the path of least resistance). However, the proposed plan forces the main intended flow of traffic through an approximate 120 degree turn .. and forces "all" traffic to break and accelerate through this intersection .... Thereby further increasing the noise disruption and inconvenience to all drivers passing through this intersection. In addition to the forced increase of noise and driver inconvenience due to the forced breaking and acceleration required at the intersection, the proposed design will force more wear and tear on vehicles and increase the negative effects on the environment by forcing less fuel efficiency, increasing tire wear, and increasing breaking wear. The forced breaking and acceleration through the proposed intersection will also force an increase in vehicle emissions as they are forced to inefficiently break and accelerate through the intersection for the life of the intersection.

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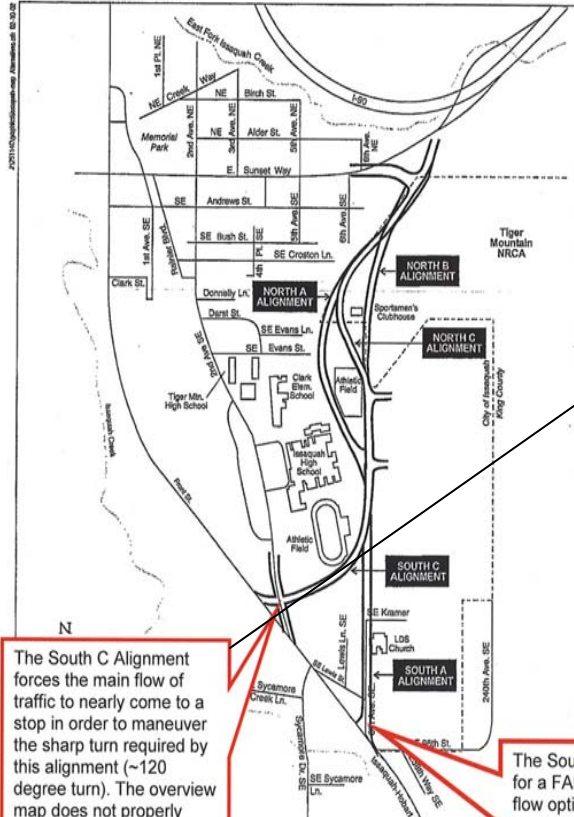
19

19. Traffic congestion on Front Street has been an issue to city planners for many years. South A is the selected preferred alternative alignment for the southern portion of the project area. The South C alignment was rejected because it would create unacceptable traffic conditions on 2<sup>nd</sup> Avenue SE.

20

20. South A is the selected preferred alternative alignment for the southern portion of the project area.

**Issaquah South East Bypass**  
**Issues and Discrepancies**



The South C Alignment forces the main flow of traffic to nearly come to a stop in order to maneuver the sharp turn required by this alignment (~120 degree turn). The overview map does not properly represent the difficult traffic flow situation and misrepresents this very flawed approach.

The South A Alignment allows for a FAR more natural traffic flow option and would come much closer to providing the intended movement of traffic around the downtown area if that was truly deemed necessary.

21

21. South A is the selected preferred alternative alignment for the southern portion of the project area.

22

22. South A is the selected preferred alternative alignment for the southern portion of the project area; the other alternative alignment.



**Issaquah South East Bypass**  
**Issues and Discrepancies**

• **Levels of Service and Delay Times**

Table 15. Year 2005 LOS and Delay for SE Issaquah Bypass Road

	South A Alignment		South C Alignment	
	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
Southeast Bypass	LOS A	LOS A	LOS A	LOS A
E Sunset Way	8 sec/veh	8 sec/veh	8 SEC/VEH	8 sec/veh
Southeast Bypass and Park Pointe Access	LOS B	LOS B	LOS B	LOS B
	16 veh/sec	12 veh/sec	16 veh/sec	12 veh/sec
Southeast Bypass and Front Street	LOS B	LOS B	LOS C	LOS B
	12 veh/sec	16 veh/sec	24 veh/sec	17 veh/sec

South A Alignment is far more effective than South C

South C Alignment is twice as slow as South A and provides a lower level of service "for the life of the bypass"

For my \$4+ million I demand that the data be accurate. They can't even get the units correct!

23

23. South A is the selected preferred alternative alignment for the southern portion of the project area.

Table 2-9  
2nd Avenue Southeast Intersections:  
Year 2005 and 2030 AM Peak Hour LOS and Delay

	No Action Scenario		Build Scenario*	
	Year 2005	Year 2030	Year 2005	Year 2030
2 <sup>nd</sup> /Sunset	LOS B 11 sec/veh	LOS C 29 sec/veh	LOS A 5 sec/veh	LOS A 3 sec/veh
2 <sup>nd</sup> /Bush	LOS B 11 sec/veh	LOS B 14 sec/veh	LOS A 4 sec/veh	LOS A 4 sec/veh
2 <sup>nd</sup> /Front	LOS F >80 sec/veh	LOS F >80 sec/veh	LOS A (South A) 4 sec/veh LOS C (South C) 24 sec/veh	LOS B (South A) 19 sec/veh LOS D (South C) 38 sec/veh

\* Results are the same for both South A and South C Build Scenario Alignment Alternatives

This note is not correct for this chart.

Demonstrates that the South A Alignment is two LOS better than the South C Alignment, allowing for six times the traffic flow in the year 2005.

Demonstrates that the South A Alignment is two LOS better than the South C Alignment, allowing for twice the traffic flow in the year 2030.

24

24. South A is the selected preferred alternative alignment for the southern portion of the project area; the other alternative alignment.

### Issues and Discrepancies

**Table 6**  
**Years 2000, 2005 and 2030 PM Peak Hour Intersection Level of Service**

Notes: For signal controlled intersections, level of service is provided with letter grade (A to F) and corresponding average second of delay by Synchro and SimTraffic software packages were used to analyze the traffic control. For unsignalized intersections (signalized and unsignalized) present.

This data is not accurate. These are the South C numbers for AM and PM ... not the South A compared to South C. For my \$4+ million I demand that the data be accurate. They can't even get the numbers transferred from one chart to another correctly!

Table 5  
Years 2000, 2005 and 2030 AM Peak Hour Intersection Level of Service

Is this data accurate? This data shows the South C numbers are nearly 3 times longer waits than the South A

Is this data accurate? This data shows the South C numbers are nearly 3 times longer waits than the South A. So why are you even considering the South C Alignment!!?

25. Although there may be a few intersection that experience a slight increase in delay, the overall Front St corridor improves in the Build scenario and also accommodates more trips.

26. South C is no longer being considered an effective alternative. South A alignment is now the preferred.

27. Although there may be a few intersections that experience a slight increase in delay, the overall Front St corridor improves in the Build scenario and also accommodates more trips.



**Issaquah South East Bypass****Issues and Discrepancies****Traffic Volumes**

Table 2-5  
2005 and 2030 PM Peak Hour Traffic Volumes for the No Action and Build Scenarios

Location	No Action Scenario				Build Scenario			
	Southbound		Northbound		Southbound		Northbound	
	2005	2030	2005	2030	2005	2030	2005	2030
Bypass south of I-90	-	-	-	-	1,795	2,520	860	1,090
Bypass north of Issaquah-Hobart Road	-	-	-	-	1,200	1,830	440	595
Front Street South south of SE Newport Way	1,185	1,695	445	535	530	680	250	325
Front Street South north of Sunset	825	925	505	570	470	515	425	530
Front Street South north of Gilman Blvd.	1,505	1,510	1,710	2,170	555	1,060	1,710	2,085
2nd Avenue SE south of SE Evans	665	895	225	270	25	25	15	15

The 2<sup>nd</sup> Avenue Southeast corridor primarily serves several residential communities and public schools. Traffic modeling indicates that without the Southeast Bypass, Front Street is over capacity, making the other north-south corridor (2<sup>nd</sup> Avenue Southeast) more desirable and resulting in significant cut-through traffic. With the Southeast Bypass, the new bypass becomes much more desirable because it has more capacity, a higher speed limit, and a direct route to the Issaquah Highlands, I-90, and Issaquah-Hobart Road.

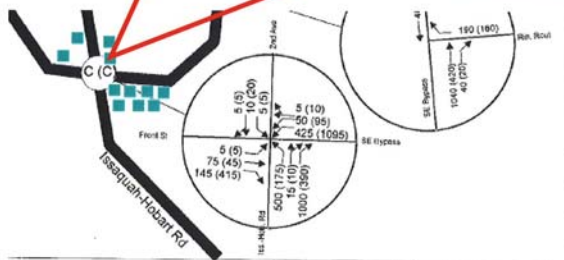
This is incredibly misleading at best. The EIS implies that 2<sup>nd</sup> Ave traffic volumes will be greatly reduced if the bypass is built. However, it does not mention that all of the homes near the proposed new intersection of 2<sup>nd</sup> Ave and Front Street will be severely negatively impacted by the "entire" traffic flow volumes which will be forced to flow through that one intersection. Therefore the homes, particularly those directly at the intersection, will actually see the total of the volumes circled in blue above, with both Northbound and Southbound added together.

28

28. South A is the selected preferred alternative alignment for the southern portion of the project area. South A avoids the intersection with 2<sup>nd</sup> Avenue that would encourage traffic use. This will also benefit nearby residential homes by reducing noise levels in those areas. South A would not impact 2nd Ave as suggested in the comment.

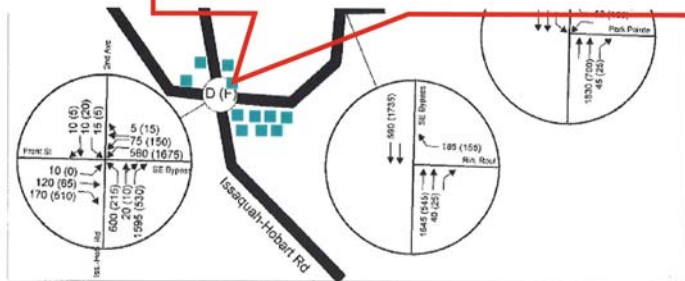
**Issaquah South East Bypass****Issues and Discrepancies**

My Home will be impacted by the entire volume of traffic passing through the proposed new intersection at 2<sup>nd</sup> Ave & Front & SE Bypass & Issaquah-Hobart Rd, both northbound and southbound. According to the DSEIS Technical Appendices, in 2005 this volume will be 2,240 in the AM and 2,270 in the PM. Yet, no mitigation or compensation has been addressed in the DSEIS for this obvious intolerable situation. This is approximately 100 times greater numbers than the DSEIS implies.



Front St/Second Ave/SE Issaquah Bypass Corridors  
2005 Peak Hour Volumes and LOS  
South C Build Scenario  
Figure 11

According to the DSEIS Technical Appendices, in 2030 the volume of high school, elementary school, etc., for the South C Alignment will be 3,200 in the PM. This greatly increases the probability of accidents involving students, & children. Yet, no mention of this or mitigation has been addressed for this obvious intolerable situation.



Front St/2nd Ave/SE Issaquah Bypass Corridors  
2030 Peak Hour Volumes and LOS  
South C Build Scenario  
Figure 20

29

29. South A is the selected preferred alternative alignment for the southern portion of the project area. South A avoids the intersection with 2<sup>nd</sup> Avenue that would encourage traffic use. This will also benefit nearby residential homes by reducing noise levels in those areas.

30

30. South A is the selected preferred alternative alignment for the southern portion of the project area. The City has agreed to work with the School District to minimize potential impacts on school facilities.

**Issaquah South East Bypass****Issues and Discrepancies****Noise**

- ❑ **The Report FAILS** to properly assess and address **NOISE** issues related to the South C Alignment .... And its data is simply in-accurate.

- It improperly assesses the impact of forcing ~2200 vehicles through the proposed South C intersection @ 2<sup>nd</sup> Ave & Front St which would be directly adjacent to existing residences (within approximately 30 feet of bedroom windows) .. Contrary to what the report claims, the noise levels would exceed the allowable dBA limits.
- I have personally performed noise level measurements using the following calibrated noise level meter

Manufacturer	Model #	Description	Last Cal	Cal Due	I.D. #
Extech Instruments	407762	Sound Level Meter	11/25/03	11/25/04	38-1004866

- I have also modeled the predictive noise levels using an internationally accepted Traffic Noise Modeling Tool.
- My modeled values are for 10 meters from the curbside, which is the approximate distance from my bedroom window to the proposed curbside. Both my measured & modeled values correlate very well ... where-as, the DSEIS values do not. Note that the modeled values in all cases are conservatively lower compared to actual measured values.

@ Peak Traffic Hours	Location	DanLam Modeled	DanLam Measured	EIS Modeled	EIS Measured	Increase (dBA) (over present)
October 2002	2 <sup>nd</sup> & Front			62 <sup>2</sup>	68 <sup>1</sup>	
July 2004	2 <sup>nd</sup> & Front	71.3	71.9			
July 2004	My front door	54.2	57.1			
July 2004	My bedroom window		48.0			
For 2005 w/South C	My bedroom window	74.6				>26
For 2030 w/South C	My bedroom window	76.2		66		>28

1) The EIS report states that this value was used for calibration.

2) The EIS report states that this model is to the nearest residence.

- Note that the EIS actual measured value from October of 2002 is 68 dBA at the intersection of 2<sup>nd</sup> & Front Street, yet the EIS predictive model for the year 2030 is only 66 dBA (conveniently 1 dBA below the maximum allowable level). With the forced increased concentration of traffic through this intersection, the DSEIS model is **CLEARLY** critically flawed and **inaccurate** at best. The data appears to be purposely manipulated in order to mislead the readers of this DSEIS document.
- Predicted traffic volumes through the proposed new intersection @ 2<sup>nd</sup> Ave & Front are far greater than the volumes of 2002 when the **68 dBA** measurements were taken, yet the authors of this document would have tax payers believe that the noise levels would go down from 68 dBA in 2002 to only 66 dBA in 2030.
- My modeled values for the years 2005 and 2030 are far more realist and accurate ... and they demonstrate that allowable limits will be greatly EXCEEDED.

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31

31. A Alternative 5/Modified Alternative 5 (with the south end alternative A) has been chosen as the preferred alternative.

When noise levels are predicted to exceed 66 dBA in the State of Washington, a noise impact is identified. FHWA regulations (23 CFR 772) specify that when noise impacts are identified, abatement (mitigation) measures must be evaluated. If abatement measures are found to be both feasible and reasonable, then abatement measures must be incorporated into the project design. If an area exceeds 66 dBA, but does not meet both the feasibility and reasonableness criteria, noise mitigation is not required.

Noise analysis for the Southeast Issaquah Bypass project followed WSDOT's policy and procedures document. Please see the following website for the guidelines followed for this projects analysis:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/policies.htm>

32

32. Modified Alternative 5 (with the south end alternative A) has been chosen as the preferred alternative.

When noise levels are predicted to exceed 66 dBA in the State of Washington, a noise impact is identified. FHWA regulations (23 CFR 772) specify that when noise impacts are identified, abatement (mitigation) measures must be evaluated. If abatement measures are found to be both feasible and reasonable, then abatement measures must be incorporated into the project design. If an area exceeds 66 dBA, but does not meet both the feasibility and reasonableness criteria, noise mitigation is not required.

Noise analysis for the Southeast Issaquah Bypass project followed WSDOT's policy and procedures document. Please see the following website for the guidelines followed for this projects analysis:

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# Issaquah South East Bypass Issues and Discrepancies

Table 6. Existing Conditions Measured and Modeled Noise Levels

	Location	Measured Leq (dBA)	Date	Time	Modeled Peak-Hour Leq (dBA)
A	East Sunset Way	This location was modeled, but not measured			63
B	6 <sup>th</sup> Ave and Bush St SE	50	October 8 <sup>th</sup> , 2002	11:00 AM	53
C	Darst St.	49	April 22 <sup>nd</sup> , 1998	5:00 PM	50
D	550 Evans Lane	47	October 8 <sup>th</sup> , 2002	10:30 AM	49
E	Tiger Mountain High School	This location was modeled, but not measured			52
F	Clark School	This location was modeled, but not measured			47
G	Athletic Field	49	October 8 <sup>th</sup> , 2002	10:00 AM	46
H	Issaquah High School	50	October 8 <sup>th</sup> , 2002	9:30 AM	47
I	Front St (NW of 2 <sup>nd</sup> )	This location was modeled, but not measured			60
J	Front St (NE of 2 <sup>nd</sup> )	This location was modeled, but not measured			62
K	2 <sup>nd</sup> Avenue (N of Front St)	This location was modeled, but not measured			58
L	SE Kramer	50	October 8 <sup>th</sup> , 2002	1:45 PM	46
M	South of South C Alignment	This location was modeled, but not measured			55
N	Lewis Lane SE	50	October 8 <sup>th</sup> , 2002	1:15 PM	49
O	Front St (NW of 2 <sup>nd</sup> )	This location was modeled, but not measured			63
P	Front St S & 2 <sup>nd</sup> Ave*	68	October 8 <sup>th</sup> , 2002	12:45 PM	62
Q	Issaquah Road Rd	This location was modeled, but not measured			59

In areas dominated by traffic noise, the modeled peak-hour traffic noise Leq (in Bold) was used for Existing Sound Levels. In areas dominated by other noise sources, the measured Leq (in Bold) were used. \*Measurement site was at edge of roadway and used for calibration only. Modeled result is at nearest residence.

NOTE: The Front Street & 2<sup>nd</sup> Ave measured value in 2002 was taken at **non-peak traffic hours** ... Yet, this was the value used for **calibration** as stated in the Technical Report on Page 18 of the section on Noise.

From page 16 of the Transportation Technical Report: Peak traffic hours are designated as shown. The data supposedly used for "**Calibration**" was not even taken during peak traffic hours.

18

Noise Technical Report

Southeast Issaquah Bypass Draft Supplemental EIS

The traffic analysis results are recorded as a level of service (LOS) designation primarily determined through the anticipated intersection delay. The results recorded are based on SimTraffic software results. SimTraffic simulates the network corridor, and the simulation is recorded for the entire peak hour. The AM peak hour was designated as 7:00 to 8:00 AM and the PM peak hour was considered as 5:00 to 6:00 PM. SimTraffic creates a simulation for the peak hour and assumes random arrival for vehicles at the intersections. Due to the random arrival of vehicles, results may differ slightly per file.

This once again shows how critically flawed the DSEIS is. Actual 2004 measurements "at peak traffic hours" show the noise levels to be 71.9 dBA. "Properly Modeled noise levels at peak traffic hours for volumes shown in the report yield noise levels from >26 dBA to >28 dBA higher than existing noise levels, and far above the King County Maximum Permissible Noise Levels for residential areas.

33. Measurement site was at edge of roadway and used for calibration only. Modeled result from FHWA's Traffic Noise Model were used to estimate the noise levels at nearest residence. Noise measurements are conducted during off-peak periods to ensure that traffic is free flowing. Traffic volumes are counted during the noise measurements and are input to a traffic noise model to predict noise levels. The Traffic Noise Model calculated noise levels and they are then compared to the noise levels measured. The noise model is then calibrated to within 2 dBA of the measured levels. Existing peak hour free flowing traffic volumes are then used to predict the Existing peak hour noise levels. Traffic volumes and roadway configurations of the project's Build alternative in the year 2030 are input to noise model to predict future noise levels and to assess noise impacts.

Because of the logarithmic decibel scale, a doubling of the number of sound sources (such as the number of cars operating on a roadway) increases noise levels by 3 dBA. A ten-fold increase in the number of sound sources would add 10 dBA. As a result, a sound source emitting a sound level of 60 dBA combined with another sound source of 60 dBA yields a combined sound level of 63 dBA, not 120 dBA.

34. Measurement site was at edge of roadway and used for calibration only. Modeled results from FHWA's Traffic Noise Model were used to estimate the noise levels at nearest residence. Noise measurements are conducted during off-peak periods to ensure that traffic is free flowing. Traffic volumes are counted during the noise measurements and are input to a traffic noise model to predict noise levels. The Traffic Noise Model calculated noise levels and they are then compared to the noise levels measured. The noise model is then calibrated to within 2 dBA of the measured levels. Existing peak hour free flowing traffic volumes are then used to predict the Existing peak hour noise levels. Traffic volumes and roadway configurations of the project's Build alternative in the year 2030 are input to noise model to predict future noise levels and to assess noise impacts. Because of the logarithmic decibel scale, a doubling of the number of sound sources (such as the number of cars operating on a roadway) increases noise levels by 3 dBA. A ten-fold increase in the number of sound sources would add 10 dBA. As a result, a sound source emitting a sound level of 60 dBA combined with another sound source of 60 dBA yields a combined sound level of 63 dBA, not 120 dBA.

35. When noise levels are predicted to exceed 66 dBA in the State of Washington, a noise impact is identified. FHWA regulations (23 CFR 772) specify that when noise impacts are identified, abatement (mitigation) measures must be evaluated. If abatement measures are found to be both feasible and reasonable, then abatement measures must be incorporated into the project design. If an area exceeds 66 dBA, but does not meet both the feasibility and reasonableness criteria, noise mitigation is not required.

Noise analysis for the Southeast Issaquah Bypass project followed WSDOT's policy and procedures document. Please see the following website for the guidelines followed for this projects analysis:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/policies.htm>

## Issaquah South East Bypass

### Issues and Discrepancies

Impacts
Noise (continued)
<b>Alternative 5</b> Peak-hour noise levels would increase by up to 17 dBA above existing conditions by 2030. Four residences, an athletic field and a church would experience noise impacts that would approach or exceed noise abatement criteria.
<b>Alternative 6</b> Peak-hour noise levels would increase by up to 15 dBA above existing conditions by 2030. Seven residences and an athletic field would experience noise impacts that would approach or exceed noise abatement criteria.

On page S-24 of the DSEIS the report states that "up to 15 dBA above existing conditions by 2030" would occur during Peak-Hour conditions. This is inaccurate and very misleading. Actual values would be >28 dBA higher than existing noise levels.

Actual values would be >26 dBA in 2005 and >28 dBA in 2030 **higher than existing noise levels.**

Department of Transportation, 1982, Noise Abatement Council). WSDOT has defined an increase of 10 dBA or more to be a substantial increase.

Because traffic is exempt from the King County Standards, the Federal Highway Department (FHWA) noise abatement criteria (NAC) are used to determine impacts from traffic noise. Under the FHWA guidelines, impacts occur when predicted  $L_{eq}(h)$  noise levels approach or exceed the NAC or substantially exceed existing noise levels (U.S. Department of Transportation, 1982, Noise Abatement Council). Substantially exceed is defined an increase of 10 dBA or more in the State of Washington.

The FHWA noise abatement criteria specify exterior  $L_{eq}(h)$  noise levels for various land activity categories (Table 3). For receptors where serenity and quiet are of extraordinary significance, the noise criterion is 57 dBA. For residences, parks, schools, churches, and similar areas, the noise criterion is 67 dBA. For other developed areas, the noise criterion is 72 dBA. A traffic noise impact is defined to occur if the noise level approaches within 1 dBA of the noise abatement criterion or if the noise level were 66 dBA or higher, it would approach or exceed the noise abatement criterion of 67 dBA for residences.

I have a documented medical history which requires a serene environment. The South C Alignment would make my home "unlivable" for me and it would no longer serve its intended purpose.

Table 3. FHWA Noise Abatement Criteria

Activity Category	$L_{eq}(h)$ (dBA)	Description of Activity Category
A	57 (exterior)	Lands on which serenity and quiet are of extraordinary significance and serve an important public need, and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.
B	67 (exterior)	Picnic areas, recreation areas, playgrounds, active sports areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals.
C	72 (exterior)	Developed lands, properties, or activities not included in Categories A or B above.
-	-	Undeveloped lands.
52 (interior)		Residences, motels, hotels, public meeting rooms, schools, churches, libraries, hospitals, and auditoriums.

Noise levels at the homes near the proposed new intersection @ 2<sup>nd</sup> & Front would far exceed allowable limits.

36

37

38

39

36. Modified Alternative 5 (with the south alignment A) has been chosen as the preferred alternative.

When noise levels are predicted to exceed 66 dBA in the State of Washington, a noise impact is identified. FHWA regulations (23 CFR 772) specify that when noise impacts are identified, abatement (mitigation) measures must be evaluated. If abatement measures are found to be both feasible and reasonable, then abatement measures must be incorporated into the project design. If an area exceeds 66 dBA, but does not meet both the feasibility and reasonableness criteria, noise mitigation is not required.

Noise analysis for the Southeast Issaquah Bypass project followed WSDOT's policy and procedures document. Please see the following website for the guidelines followed for this projects analysis:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/policies.htm>

37. See response to comment 31 of this letter.

38. See response to comment 31 of this letter.

39. See response to comment 31 of this letter.

**Issaquah South East Bypass****Issues and Discrepancies**

Table 9. Predicted Modeled Noise Levels

Receptor	2000 Existing Conditions	2030 Alt. 1	2030 Alt. 2	2030 Alt. 3	2030 Alt. 4	2030 Alt. 5	2030 Alt. 6	2030 Alt. 7 (No Action)
A	63	65	65	65	65	65	65	68
B	53	54	54	57	57	54	54	53
C	50	54	53	52	51	53	53	55
D	49	65	65	53	53	55	58	51
E	52	54	53	52	51	53	52	57
F	47	56	56	50	50	53	54	51
G	55	65	65	56	56	64	64	49
H	64	64	55	53	57	57	57	51
I	57	60	58	60	58	60	60	61
J	61	62	61	62	61	62	62	63
K	55	59	55	59	55	59	59	61
L	64	55	64	55	64	55	55	49
M	56	68	56	68	56	68	59	59
N	49	66	55	66	55	66	55	51
O	62	61	65	62	65	62	65	66
P	62	60	66	61	66	61	66	65
Q	59	60	63	60	63	60	63	62

Underline = Noise increase impact**Bold** = Approaches or exceeds FHWA NAC\*In areas dominated by traffic noise, the modeled noise levels were used for L<sub>eq</sub> were used.

Sound Levels.

This is completely inaccurate and misleading. Location "P" is the existing intersection of 2<sup>nd</sup> Ave & Front Street. With the South C Alignment, this intersection moves to a completely different location next to residential housing. Existing noise levels are significantly lower at these residential homes than shown.

This is completely inaccurate and misleading. Accurate modeled values for 2030 will exceed 76 dBA and greatly exceed allowable limits. This data was either done with incredible incompetence, or purposely manipulated to provide a desired outcome. It clearly shows the DSEIS to be critically flawed.

Since the values used for "calibration" are inaccurately taken and during non-peak traffic times, as well as, based on out-dated information, all of the noise measurement calculations and data must be considered invalid. All Noise data needs to be redone!!

Actual EIS measurements on Oct. 8th 2002 show this intersection to be **68 dBA** during non-peak hours (71.3 dBA July 5<sup>th</sup> 2004 by DPL during peak hours), yet the developers of this report would attempt to mislead the readers into thinking that initial noise levels are only 62 dBA and will only increase to 66 dBA in 2030. This report is "critically flawed" and is either purposely attempting to mislead, or is simply incompetently prepared.

40

40. See response to comments 31 &amp; 33 of this letter.

41

41. See response to comments 31 &amp; 33 of this letter.

42

42. See response to comment 33 of this letter.

43

43. See response to comments 31 &amp; 33 of this letter.



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## Issaquah South East Bypass

### Issues and Discrepancies

The South A Alignment is significantly better than the South C Alignment. Especially if the South C Alignment impacts were properly shown.

Table 10. Summary of Noise Impacts

Alternative	Impacts (without Mitigation)		Impacts (with Mitigation)	
	Residences	Other	Residences	Other
Alternative 1	11	3	4	2
Alternative 2	14	2	7	1
Alternative 3	4	1	4	1
Alternative 4	7	0	7	0
Alternative 5	4	2	4	2
Alternative 6	7	1	7	1
Alt. 7 No Action	15	0	15	0

Other includes: outdoor recreation areas, schools, churches, and hospitals.

Again the report fails to accurately represent to true situation. Just in the 2<sup>nd</sup> Ave & Front Street proposed intersection alone there are approximately 11 homes negatively impacted by noise with the South C Alignment.

Again misleading and inaccurate, the homes indicated below would be far less impacted by the NO BUILD action than indicated.

Major noise impact to these ~11 homes near 2<sup>nd</sup> Ave & Front alone.

#### Noise Insulation of Buildings

Insulation of buildings could be feasible, but this remedy does not apply to commercial and residential structures that constitute most of the project area. This could be an effective way to mitigate interior noise levels for Issaquah High School, but assuming a 20-dBA reduction factor for the school's walls (with windows closed, which is typical for climate-controlled buildings), no interior noise above the FHWA NAC of 52 dBA would be expected; therefore, there would be no interior noise impacts to mitigate.

Why doesn't/couldn't Insulation of Buildings apply to residential structures?!

44

44. See response to comment 31 of this letter.

45

45. See response to comments 31 & 33 of this letter.

46

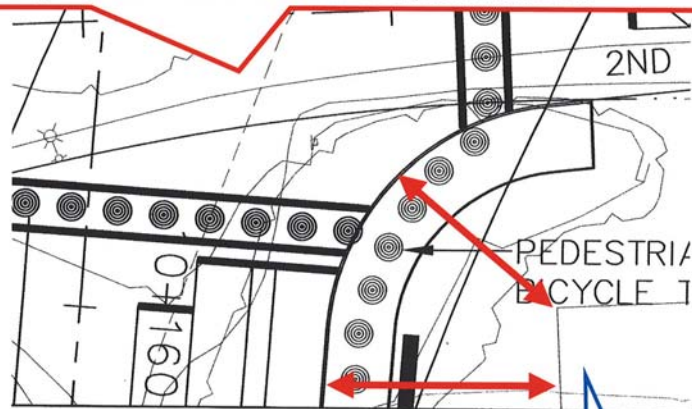
46. The SE Issaquah Bypass project followed WSDOT policy and procedures, which can be found at the following website:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/policies.htm>

**Issaquah South East Bypass**  
**Issues and Discrepancies**

- Most of the homes in the proposed new intersection area do not have air-conditioning and it is normal and typical to open windows at night ... **the increased noise would simply make these homes unlivable ...**

According to the DSEIS Technical Appendices, in 2030 the volume of traffic through the 2<sup>nd</sup> Ave & Front St. intersection for the South C Alignment will be 3,190 in the AM and 3,200 in the PM. This traffic will be directly adjacent to two residences. Yet, no mitigation is planned in the DSEIS for this obvious intolerable situation. These homes need to be purchased for fair market value, plus moving costs, plus home finding fees, plus cost differences for obtaining comparable homes in different local areas, plus additional costs.



*Southeast Issaquah Bypass*  
*Draft Supplemental EIS*

Chapter 5

Bedrooms ~30 feet  
from Curbside

In addition;

- There is no discussion of increased noise levels from additional heavy trucks—which were previously barred from Front Street, which would now use the Bypass. The DSEIS Noise Model only accounts for 1% medium trucks and 4% for heavy trucks.
- There is no discussion of monitoring noise to ensure that sound is not increased beyond a fixed allowable amount without mitigation required to reduce the noise to allowable range.
- There is no discussion for the significant major increase in noise during normal sleeping hours for the homes directly near the proposed new intersection with the South C Alignment.

47

47. Noise abatement of any kind must meet WSDOT feasibility and reasonableness criteria. Please see response to comment 31 of this letter.

48

48. The noise analysis used truck traffic percentages that were supplied by the traffic team. Additional garbage truck traffic was not included in the analysis.

49

49. See response to comment 31 of this letter.

50

50. The noise abatement criteria applies for peak hour traffic volumes only.



### Issaquah South East Bypass

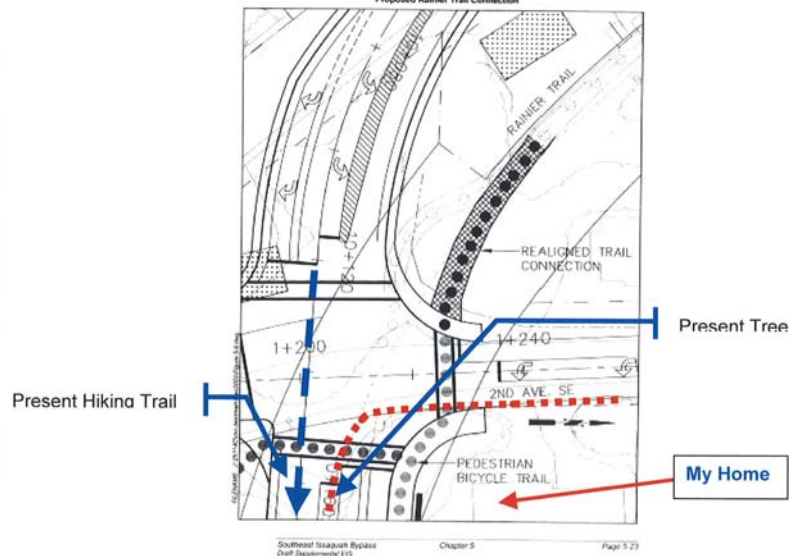
#### Issues and Discrepancies

- **Sound barrier walls:** The report states that Sound barrier walls cost too much and therefore will not be considered, yet the cost of litigation will far exceed the cost of the sound barriers.

Impacts	Mitigation
<b>Noise (continued)</b>	
<b>Alternative 5</b> Peak-hour noise levels would increase by up to 17 dBA above existing conditions by 2030. Four residences, an athletic field and a church would experience noise impacts that would approach or exceed noise abatement criteria.	Two noise walls were evaluated. One wall could not meet WSDOT feasibility criteria and achieve a minimum 7-dBA reduction in noise. The other wall did not meet WSDOT reasonableness criteria. Both walls were found to be "unreasonable" or "not feasible" based on FHWA noise abatement criteria. Therefore, no mitigation is proposed.
<b>Alternative 6</b> Peak-hour noise levels would increase by up to 15 dBA above existing conditions by 2030. Seven residences and an athletic field would experience noise impacts that would approach or exceed noise abatement criteria.	Two noise walls were evaluated. Both noise walls were found to be "unreasonable" or "not feasible" based on FHWA noise abatement criteria and neither met WSDOT reasonableness criteria. Therefore no mitigation is proposed.

- ☑ This alone would make my home "unlivable !!! If the South C Alignment was foolishly approved, The City of Issaquah will need to purchase my home for fair market value and pay costs of moving expenses and home finding fees, increased costs for equivalent home and lot in a different location, plus additional costs.
- ☑ The lack of detailed assessment and incompetent mitigation proposals are completely unacceptable and only further demonstrates how incredibly flawed this report is in that it completely fails to address the issues regarding individual homeowners.

Figure 5-4  
Proposed Rainier Trail Connection



51

51. Alternative 5 (with the south alignment A) has been chosen as the preferred alternative.

Figure 4-4  
Locations of Evaluated Noise Walls

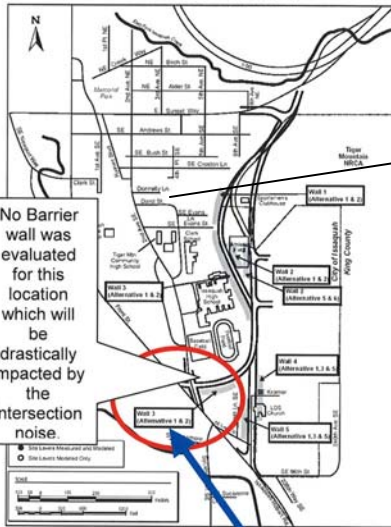
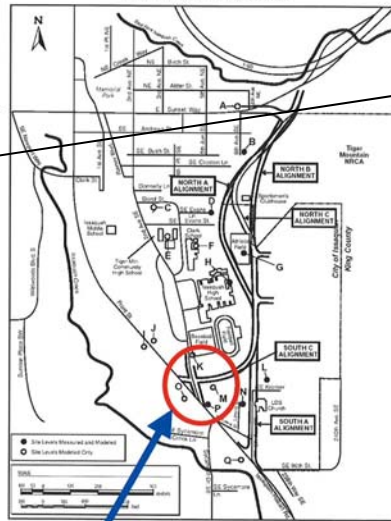


Figure 4-2  
Noise Sites Measured and Modeled



52

52. See response to comment 31 of this letter.

Table 4-7  
Preliminary Noise Barrier Evaluation

Wall Evaluated – Benefited Receptors; Alternatives	Result
Wall 1 – Receptor D; Alternatives 1 and 2	Feasible, Reasonable
Wall 2 – Receptor G; Alternatives 1 and 2	Not Feasible
Wall 2 – Receptor G; Alternatives 5 and 6	Feasible, Not Reasonable
Wall 3 – Receptor H; Alternatives 1 and 2	Feasible, Reasonable
Wall 4 – Receptor L; Alternatives 1, 3 and 5	Not Feasible
Wall 5 – Receptor N; Alternatives 1, 3 and 5	Feasible, Not Reasonable
Wall 6 – Receptors M & P; Alternatives 2, 4 and 5	Feasible, Not Reasonable

Figure 4-4 conflicts with Table 4-7 which conflicts with Figure 4-2. Table 4-7 conflicts with the mitigation statements on page 4-17 and 4-19 of the DSEIS. What a totally screwed-up critically flawed report for \$4 million.

There is no "Wall 6" shown in Figure 4-4

53

53. Wall 3 provides abatement for Issaquah High School. Wall 6 was mislabeled in the graphic, but is accurately described in the text.

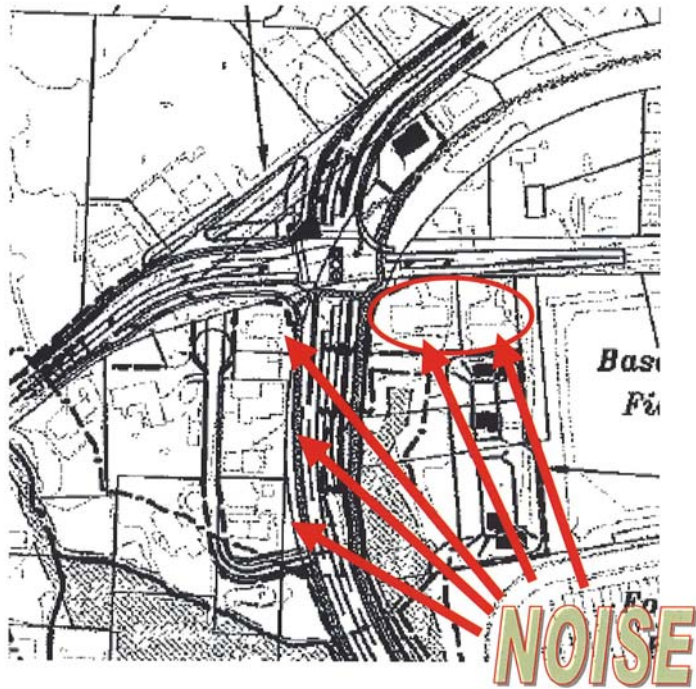
#### Mitigation

Mitigation measures under Alternative 2 are the same as for Alternative 1, except that an additional barrier (Wall 6) was evaluated for Alternative 2 south of the South C alignment (Receptor M) and near the intersection of Front Street South and 2nd Avenue Southeast (Receptor P). This barrier was not found to be reasonable, because it would cost \$36,900 per benefited residence to provide a 7 dBA reduction, which would not meet WSDOT reasonableness cost criteria that ranges between \$15,500 and \$18,500 per benefited receiver for the affected receivers.

**Issaquah South East Bypass**

**Issues and Discrepancies**

▪ **Additional Noise Impacts**



The DSEIS report is also critically flawed in that it fails to assess or address the significant negative impact of increased noise levels emanating from the Issaquah High School main field due to the removal of trees and buildings which presently act as noise reducing barriers. The creation of the detention pond and the South C Alignment road would force the removal of these existing sound barriers.

54

54. See response to comment 51 of this letter



**Issaquah South East Bypass**

**Issues and Discrepancies**

**Acceptable dBA Levels**

**Guidelines for acceptable noise levels in terms of dBA for different locations.**

**Internationally Accepted Guidelines for Acceptable Noise Levels**

Acceptable Equivalent Sound Level -  $L_{eq}$  - for different location can be taken from the table below:

Location	Effects	$L_{eq}$ (dBA)	Time (hours)	Time of day
Bedroom	sleep disturbance, annoyance	> 30	8	night
Living area	annoyance, speech interference	> 50	16	day
Outdoor living area	moderate annoyance	> 50	16	day
Outdoor living area	serious annoyance	> 55	16	day
Outdoor living area	sleep disturbance, with open windows	> 45	8	night
School classroom	speech interference, communication disturbance	> 35	8	day
Hospitals: patient rooms	sleep disturbance, communication interference	> 30- 35	8	day and night

**Disturbance and interference occurs at levels greater than the levels shown in the above table**

- 15 dBA at "peak" period - What is the impact at all other hours of the day? Late evening and normal sleeping hours ... noise will increase significantly ... this again would make my home unlivable
- Braking and accelerating noise at the proposed corner and traffic light will also be significantly increased and is also not addressed in the current study. The forced breaking and accelerating through the South C Alignment intersection at night will be intolerable. It is my belief that, again, this would make it unlivable near this intersection.
- Noise and dust pollution for the 1.5 to 2 years during construction would again make my home unlivable
- The proposal will likely increase the number of trucks which pass directly by the homes also increases noise levels with lower frequency harmonics
- What is the comparison of no-build with noise mitigation versus build with mitigation
- At what distance from the source are the noise levels referring to? My home is only a few feet from the proposed traffic light at 2<sup>nd</sup> & Front ... **I want to see the actual data for the noise increase at my home** ... which is directly where I am impacted. The report states that the corner was "modeled" but not measured .... This is unacceptable ...
  - Table 9 indicates that the noise level would decrease by "2 dBA" from the actual 2002 measured level of 68 dBA .... which any human being with reasonable intelligence could tell you is ridiculous ....
- There is Direct correlation between noise level and stress & health related issues. Yet the DSEIS offers no mitigation for the obvious intolerable situation for the homes near this intersection.
- There is Direct correlation between the value of my home and the environmental ambient noise in the area of my home .... Yet the DSEIS offers no mitigation for the obvious devaluation for the homes near this intersection.

55

55. See response to comment 51 of this letter

56

56. See response to comments 31 & 33 of this letter

57

57. See response to comments 31 & 33 of this letter.

**Issaquah South East Bypass****Issues and Discrepancies****Noise – Additional misleading/inaccurate Data**

<b>Alternative 6:</b> North C and South C	Nearby receptors would experience temporary noise impacts during project construction.	South of South C alignment would experience up to a 13-dBA increase.
<b>Alternative 7:</b> No Action	No project-related construction would occur.	Up to a 5-dBA increase in project area traffic noise levels.

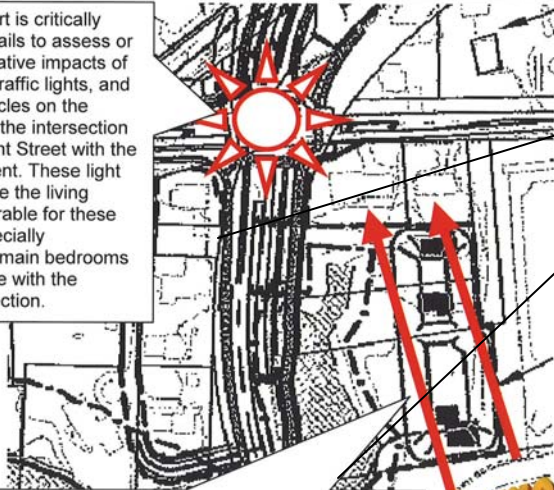
The Table 1. Summary of Noise Impacts and Mitigation shows that the Operational Impact of Noise with the South C Alignment is only 13 dBA increase, yet on page 26 of the Noise Technical Report it states 15 dBA, ... but more importantly, properly modeled values show increases of >26 dBA for 2005 and increases of >28 dBA for 2030. These would actually be far worse than the South A Alignment.

Southeast Issaquah Bypass  
Draft Supplemental EIS

Noise  
Technical Report

**Lighting Environmental Impacts**

The DSEIS report is critically flawed in that it fails to assess or address the negative impacts of Street lighting, Traffic lights, and Lights from Vehicles on the residences near the intersection of 2<sup>nd</sup> Ave & Front Street with the South C Alignment. These light sources will make the living conditions intolerable for these residences, especially considering that main bedrooms are directly in line with the proposed intersection.



The DSEIS report is critically flawed in that it fails to assess or address the negative impacts of Lights from Issaquah High School's main field on at least two residences near the intersection of 2<sup>nd</sup> Ave & Front Street with the South C Alignment. With the removal of the existing trees and buildings which presently block these light sources, the living conditions at these homes will be significantly negatively impacted.

**Large Light Sources**

58

58. See response to comment 51 of this letter.

59

59. South A is the selected preferred alternative alignment for the southern portion of the project area. South A avoids the intersection with 2<sup>nd</sup> Avenue.

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### Issaquah South East Bypass

### Issues and Discrepancies

This model implements most of the procedure detailed in the Calculation of Road Traffic Noise (CRTN - ISBN 0 11 550847 3) issued by the Department of Transport. The aim has been to provide a basic platform for calculating road traffic noise levels for non-complex situations. The model is limited where for example; a separate calculation will be needed to take account of any complex arrangements of reflecting surfaces, as only a simple reflective correction is implemented here. Where consideration is to be given to situations where low traffic flows occur, it will be necessary to make specific reference to CRTN. In such cases, a further correction is generally needed, which is not implemented here. Copies of CRTN are available from [The Stationary Office](#).

**Model/Calculation for 2<sup>nd</sup> Ave & Front Street in July 2004 at peak traffic hours based on traffic volumes from the DSEIS. NOTE: This calculation does not include "any" assessment for "Heavy Vehicles":**

**Calculate the basic noise level at a reference distance of 10m away from the nearside carriageway edge for each segment.**

Time Period ☒ Hourly L<sub>10</sub> ☐ 18 Hour L<sub>10</sub>

Total Vehicle Flow  (Veh/Hour : Veh/18 Hour)

Speed  (km/h) - (56 km/h = 35 mph)

Heavy Vehicles  (%)

Gradient  (%) ☒ Upward flow [help](#)

Road Surface  [help](#)

71.3  
dB(A)

My Actual measurements done in July 2004 at peak traffic hours yielded noise levels of 71.9 dBA. These Actual measurements correlate within 1 % of my calculated values.

60

60. South A is the selected preferred alternative alignment for the southern portion of the project area. South A avoids the intersection with 2<sup>nd</sup> Avenue and would not affect homes near the South C alignment.

**Issaquah South East Bypass****Issues and Discrepancies****Visual Impacts**

- ☒ The DSEIS Fails to properly assess and address Visual Impacts; The properties near the proposed intersection at 2<sup>nd</sup> Ave and Front Street have not been properly assessed or adequately addressed/mitigated with respect to Visual Impacts ...

**Table 4-29**  
**Visual Quality Ratings**

Location	Existing	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6	Average Rating for Build Alternatives	Average Change
<b>Viewshed 1</b>									
From East Sunset Way looking NE	6.45	5.25	5.25	5.25	5.25	5.25	5.25	5.25	1.20
At Bush and 6th Streets looking E and S	6.33	6.25	6.25	6.25	6.25	6.25	6.25	6.25	0.08
From Tiger Mountain looking W	6.25	5.50	5.50	6.05	6.05	5.75	5.75	5.77	0.48
<b>Viewshed 2</b>									
Near Sportsman's Clubhouse looking N and E	7.50	7.25	7.25	6.25	6.25	7.33	7.33	6.94	0.55
Near Issaquah High School athletic field looking N	6.50	5.30	5.30	5.10	5.10	4.95	4.95	5.12	1.38
<b>Viewshed 3</b>									
From SE Kramer Pl looking NW	6.60	5.75	6.58	5.75	6.58	5.75	6.58	6.17	0.44
Near LDS Church on 6th looking NE	6.70	5.00	6.66	5.00	6.66	5.00	6.66	5.83	0.87
Near 2nd Ave. and Front St. looking E	6.55	6.55	5.20	6.55	5.20	6.55	5.20	5.88	0.68
Average all views and average difference	6.61	5.88	6.00	5.91	6.03	5.87	6.00	5.95	0.66
FHWA Visual Rating Scale: 10 = very high; 9 = high; 7, 8 = moderately high; 4, 5, 6 = average; 2, 3 = moderately low; 1 = low.									

**10 = very high; 9 = high; 7, 8 = moderately high;** The ~14 homes in the immediate area of the proposed intersection of 2nd Ave and Front Street will have Visual Impacts of at least moderately high, **with most of these homes being at 10 = Very High.** Please go to this proposed intersection and take a look for yourselves instead of accepting the written word in the EIS as accurate.

61

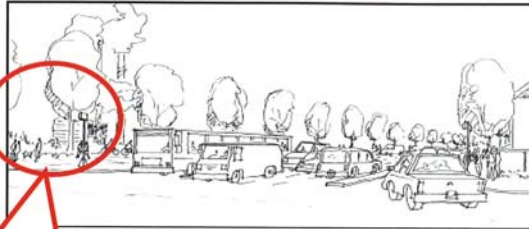
61. The South A alignment is the preferred alignment for the southern portion of the project area.



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### Issaquah South East Bypass

#### Issues and Discrepancies



(partial view for South C Alignment only)

Figure 4-36  
Proposed View at 2<sup>nd</sup> Avenue SE, Looking East (Viewshed 3)

My Home is not shown in proper proportion with respect to the curbside distance. My home is only approximately 30 feet front the proposed curbside and would fill this corner view.



Existing entrance to hiking trail

My Home is behind these trees. My home is only approximately 30 feet front the proposed curbside and would fill this corner view.

Current views from 2<sup>nd</sup> Ave at proposed intersection looking East (Viewshed 3)

**Visual Impacts to all of the homes in this area would be devastating**

62

62. The South A alignment is the preferred alignment for the southern portion of the project area.





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Issaquah, WA 98027

### Issaquah South East Bypass

#### Issues and Discrepancies



South and South West views from the front of my home where proposed intersection and right turn lane would be

Entire area devastated



South East view of my home

Proposed 2<sup>nd</sup> Ave &  
Front Main Intersection

Entire area devastated



## Issaquah South East Bypass Issues and Discrepancies

### • Health and Safety

❑ **The Report also FAILS** because ... It does not address or assess the significant increase in **Safety Issues** directly related to the predictably large increase in traffic accidents at the intersection nearest to Issaquah High School.

- It can be predicted<sup>(1)</sup> that with the South "C" Alignment, the accident rate at the proposed intersection closest to the High School<sup>(2)</sup> will have an increased accident rate of as much as 20 times the current accident rate.
- With the South "A" Alignment, it can be predicted that the accident rate at the intersection closest to the High School<sup>(2)</sup> will have a rate of as much as 2/3rds lower than the South C Alignment.
- The South C Alignment places both parents, children and students at an unacceptable higher risk. If it is determined that a bypass is truly needed, then on this point alone, the **South A Alignment** is the only acceptable alignment. To choose the South C Alignment would be to knowingly and purposely accept responsibility for placing the lives and safety of parents, children and students at an unacceptable higher risk.
- The South C Alignment is a traffic flow nightmare and "will" significantly increase the accident rate at the proposed intersection of 2<sup>nd</sup> Ave, Front St, SE Bypass, and Issaquah-Hobart Road.

1) Based on Table 12 of the Technical Report and the traffic model predictions of figures 18, 19, and 20 ...

2) @ 2<sup>nd</sup> Ave and Front Street ...

Table 12: Intersection Accidents by Accident Type

Intersection Accidents	Rear End	Right Angle	Left Turn	Right Turn	Head On	Side Swipe	Ped/Bike	Drive way	Fixed Object	Other	Total
SR 900 & NW Sammamish Road/12th Ave NW	28	6	2	1		3			1		41
SR 900 & I-90 WB Ramps	9	4	1			1					15
SR 900 & EB Ramps	11	4	2			4	1				22
SR 900 & NW Gilman Blvd	17	5	10			4	1			1	38
SR 900 & Maple Street	3	4	16			1					24
SR 900 & Mall Street	12	4	4			2					22
SR 900 & SE Newport Way	5		16		1	1			1		24
E Lake Sammamish Pk & SE 43rd Way											0
E Lake Sammamish Pk & SE 56th Street	7	1	2					1		1	16
E Lake Sammamish Rd & SE Black Nugget Rd	2		3								5
E Lake Sammamish Pk & SE 62th Street	6	2									8
E Lk Sammamish Pk & Issaquah Fall City Rd	9	4	6			27			1		49
Front Street & I-90 WB Ramps	9	3	5								17
Front Street & I-90 EB Ramps	33	8	16			3					60
Front Street & Gilman Blvd	31	9	3			6	1				50
Front Street & Dogwood Street NW	8	1							1		10
Front Street & Sunset Way	2			1		1	2		1		7
Front Street & SE Clark Street	15	1	2	1					1	1	21
Front Street & 2nd Ave SE	3										3
2nd Ave NE & Sunset Way	2	4				1	1				8
Issaquah Fall City Rd & Issaquah Pine Lake Rd	6	3				1					10
<b>Total</b>	<b>218</b>	<b>63</b>	<b>90</b>	<b>3</b>	<b>1</b>	<b>59</b>	<b>7</b>	<b>0</b>	<b>6</b>	<b>3</b>	<b>459</b>
<b>Percent</b>	<b>48.4%</b>	<b>14.0%</b>	<b>20.0%</b>	<b>0.7%</b>	<b>0.2%</b>	<b>13.1%</b>	<b>1.6%</b>	<b>0.0%</b>	<b>1.3%</b>	<b>0.7%</b>	<b>100.0%</b>

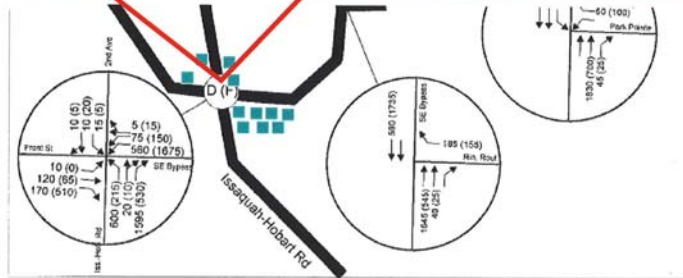
63. Comments noted. The City has agreed to work with the School District to reduce potential impacts on school facilities. Modified Alternative 5 was chosen as the preferred alternative because it is the only effective build alternative that has impacts that can be effectively mitigated.



### Issaquah South East Bypass

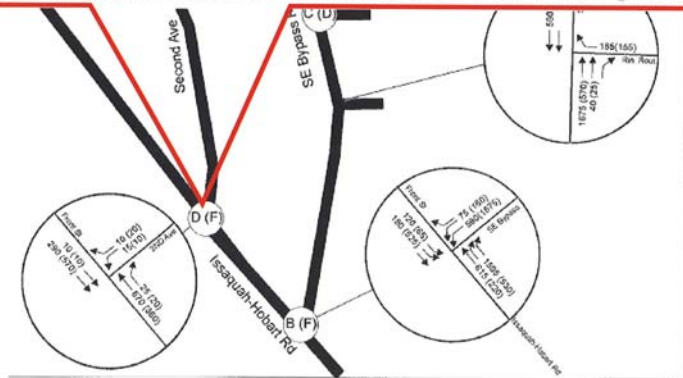
#### Issues and Discrepancies

According to the DSEIS Technical Appendices, in 2030 the volume of traffic nearest to the high school, elementary school, etc., for the South C Alignment will be **3,190** in the AM and **3,200** in the PM. This greatly increases the probability of accidents involving parents, students, & children. Yet, no mention of this or mitigation has been addressed in the DSEIS for this obvious intolerable situation.



Front St/2nd Ave/SE Issaquah Bypass Corridors  
2030 Peak Hour Volumes and LOS  
South C Build Scenario  
Figure 20

According to the DSEIS Technical Appendices, in 2030 the volume of traffic nearest to the high school, elementary school, etc., for the South A Alignment will be **1,020** in the AM and **990** in the PM. This is greater than 2/3rds less volume, greatly reducing the probability of accidents involving parents, students, & children compared to the South C Alignment.



Front St/2nd Ave/SE Issaquah Bypass Corridors  
2030 Peak Hour Volumes and LOS  
South A Build Scenario  
Figure 19

64

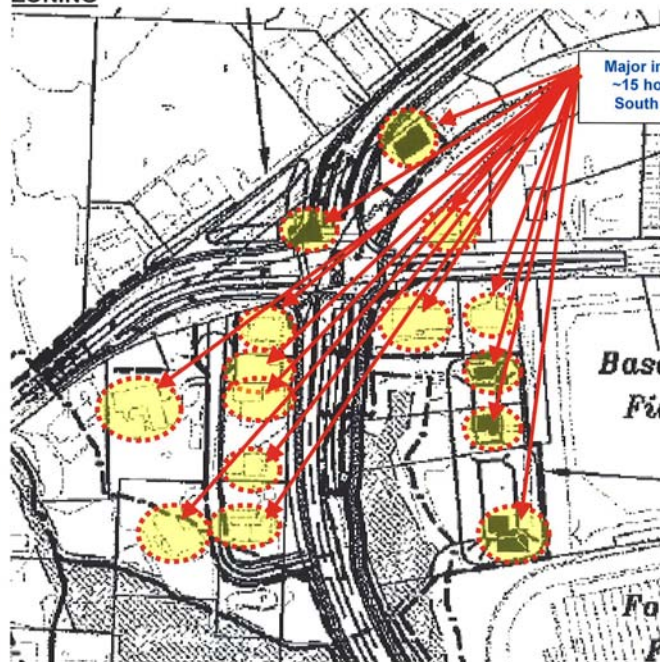
64. The South A alignment is the preferred alignment for the southern portion of the project area.

65

65. The South A alignment is the preferred alignment for the southern portion of the project area.

**Issaquah South East Bypass**  
**Issues and Discrepancies**

**ZONING**

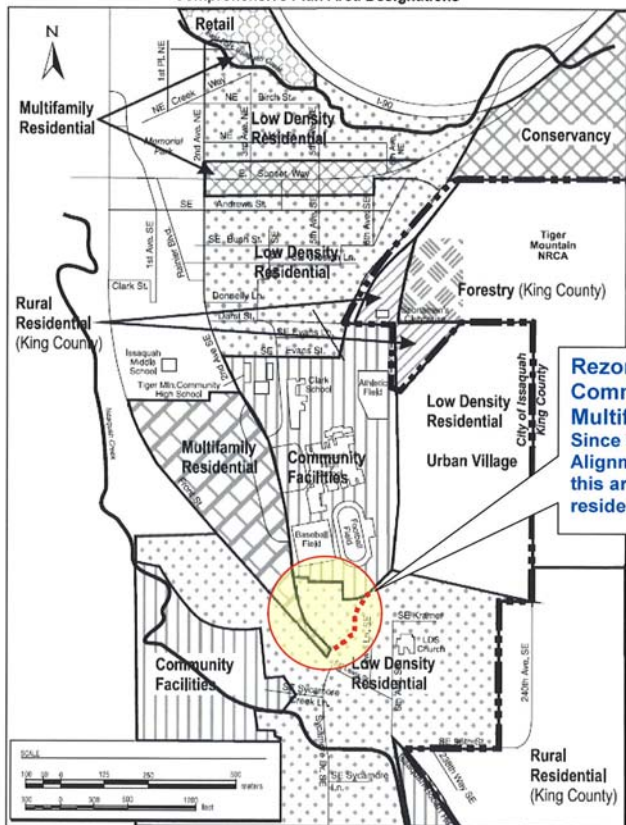


# Issaquah South East Bypass

## Issues and Discrepancies

Figure 4-25

Comprehensive Plan Area Designations



Page 4-140

Chapter 4

Southeast Issaquah Bypass  
Supplemental Draft EIS

If the South C Alignment goes through ... the residential properties near the corner of the new traffic light would be significantly negatively impacted. This area would then better serve the community, as well as the present home owners, by being zoned for Commercial/Retail or Multifamily Residential .... I officially request that this area be rezoned as described.

66

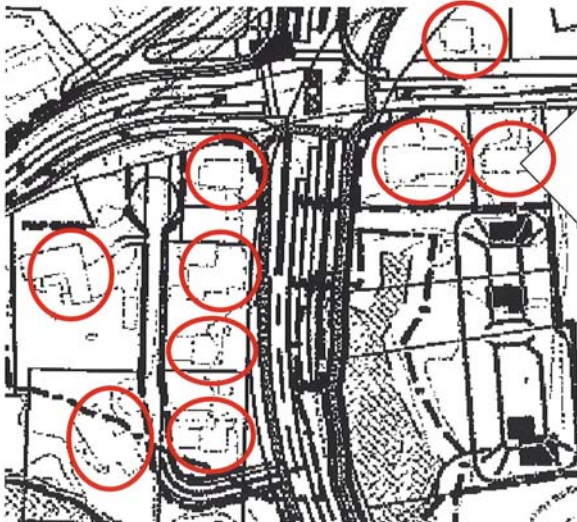
66. The South A alignment is the preferred alignment for the southern portion of the project area.



**Issaquah South East Bypass****Issues and Discrepancies****Air Quality**

- o The study focuses on carbon monoxide ... however, other items such as particulate matter and ozone are not studied
  - I need to see that a detailed study of all particulate matter at the new proposed interchange at 2<sup>nd</sup> Ave and Front Street
- o The study regarding carbon monoxide does not take into account the incredibly poorly designed proposal for traffic flow which will force nearly all traffic to decelerate and then accelerate through the proposed intersection at 2<sup>nd</sup> Ave and Front Street. ... thereby causing nearly all of the traffic through the proposed intersection to run far less efficiently and displace far more pollutants at the intersection than the study would indicate.
- o I do not see any mitigation for increased levels of air pollution directly associated in the location of the school and the homes in the affected area of the proposed intersection at 2<sup>nd</sup> Ave and Front Street ...

I want to see the data and the mitigation plan and the justification for not using the South A Alternative which would allow for normal and very efficient traffic flow.

**Privacy**

The DSEIS Fails to assess and address the significant loss of privacy for all of the homes near the proposed new intersection with the South C Alignment. All of these homes will have a major negative impact, yet the DSEIS fails to acknowledge this fact and certainly fails to mitigate against this issue. The DSEIS Fails to address the needs of individual home owners in the affected areas. There are many examples of sound barriers and cosmetic walls used throughout many cities to mitigate these types of issues, yet the city of Issaquah fails to address the needs of its citizens.

67

67. The EPA (Environmental Protection Agency) has set National Ambient Air Quality Standards (NAAQS), which specify maximum concentrations for carbon monoxide (CO), particulate matter less than 10 micrometers in size (PM<sub>10</sub>), particulate matter less than 2.5 micrometers in size (PM<sub>2.5</sub>), ozone, sulfur dioxide, lead, and nitrogen dioxide. The project area is in compliance with these standards for all pollutants, but because the Carbon Monoxide (CO) standards have been recently attained, the project is in a CO maintenance area, therefore local intersection level CO analysis is conducted. No additional modeling is conducted per WSDOT Environmental procedures, which can be found at the following website:

<http://www.wsdot.wa.gov/regions/Northwest/rp&s/environmental/aae/default.htm>

68

68. The air quality model used takes into account the level of service for the intersections analyzed. A modified Alternative 5 (with the south end alternative A) has been chosen as the preferred alternative<sup>69</sup>. The SE Issaquah Bypass air quality analysis shows that the project would meet all federal and state guidelines.

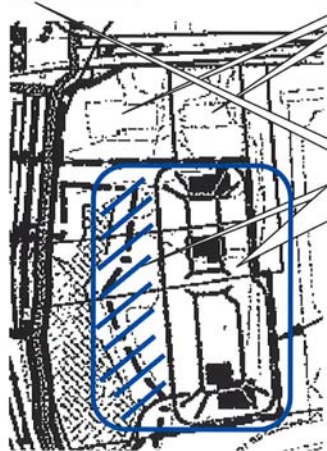
70

70. The South A alignment is the preferred alignment for the southern portion of the project area.



# Issaquah South East Bypass Issues and Discrepancies

## Storm Water



Homes

The DSEIS fails to assess or address the negative impacts of the buffer enhancement site #1, South Pond C1, South Pond C2, and South Pond C3 on the residences within the area near these water holding areas. There would be a Significant impact of increased mosquitoes and other insects, etc. ... what is the data ?? What is the mitigation plan ??

71

71. Stormwater ponds would be designed according to appropriate standards and are not expected to result in negative impacts to nearby residences. Pond would be designed to allow for fluctuations in water levels that would help prevent mosquito eggs from hatching. Buffer enhancement for Modified Alternative 5 is addressed in the wetlands discussion of Chapter 3 in this FEIS and in the Conceptual Mitigation Plan.

## Energy

### Alternative 7: No Action

Compared to 1996 existing conditions, total traffic congestion in the study area would decrease under the No Action Alternative because of traffic operation improvements resulting from completion of the Sunset Interchange. This would result in a decrease in energy use between existing and 2030 conditions.

According to this statement on page 4-21 of the DSEIS, "total traffic congestion in the study area would decrease under the No Action Alternative because of traffic operation improvements resulting from completion of the Sunset Interchange." Yet the entire DSEIS report fails to use the data which would clearly show that the proposed is even more ineffective and unnecessary than can already be seen by the data presented. Again, this further demonstrates just how critically

72

72. Although some localized improvement to traffic conditions may occur as a result of Sunset Interchange improvements, the No Action Alternative would not meet the purpose and need of this project, which is to improve traffic between I-90 and Issaquah Hobart Road. Please see Chapter 1 of this FEIS for more information on the project purpose and need.

**Issaquah South East Bypass  
Issues and Discrepancies**

**Summary:**

**For the City of Issaquah and its Residence, the DSEIS REPORT is Critically Flawed and FAILS because:**

- ❑ **FAILS** to present to the public all of the alternatives, which include viable low cost NO BUILD traffic flow improvements.
- ❑ **FAILS** to properly assess and address **NOISE** issues ....
  - It improperly assesses the impact of forcing ~2200 vehicles through the proposed South C intersection @ 2<sup>nd</sup> Ave & Front St which would be directly adjacent to existing residences (within approximately 30 feet of bedroom windows) .. exceeding the allowable dBA limits.

@ Peak Traffic Hours	Location	dBA	Increase (dBA)
Actual Measurements 2002	2 <sup>nd</sup> & Front	68	
Actual Measurements 2004	2 <sup>nd</sup> & Front	>71	
Actual Measurements 2004	My bedroom window	48	
Modeled for 2005 w/South C	My bedroom window	>74	>26
Modeled for 2030 w/South C	My bedroom window	>76	>28

- There is no discussion of increased noise levels from additional heavy trucks—including garbage trucks going from transfer stations to the Cedar Hills landfill, which were previously barred from Front Street, using the Bypass.
- There is no discussion of monitoring noise to ensure that sound is not increased beyond a fixed allowable amount without mitigation required to reduce the noise to allowable range.
- It states that Sound barrier walls cost too much and therefore will not be considered, yet the cost of litigation will far exceed the cost of the sound barriers.
- ❑ **FAILS** to meet the basic original intent of the project ... The cost to build the South A Alternative will exceed the cost of building the South C Alignment, yet the cost of continued logistically poor traffic flow for many years into the future will far outweigh these initial build cost differences.
  - (This only further demonstrates what most residence of Issaquah already know, that there is a **systemic** problem within the traffic flow design group of the City of Issaquah)
- ❑ **FAILS** to ... properly assess the wasted energy consumption for forcing thousands of vehicles per day to break and accelerate through a logistical traffic flow nightmare with the South C Alignment proposal.
- ❑ **FAILS** because ... it does not incorporate an overall comprehensive traffic flow plan
- ❑ **FAILS** because ... It states that the intent of the project is to improve traffic flow, yet it proposes the worse logistical traffic flow alternative.
- ❑ **FAILS** because ... It does not properly assess and address the devaluation of approximately 14 homes in the South C Alignment area and it provides no mitigation plan for this issue.
  - There is no discussion of how many homeowners will have parts of their property taken & what this will do to their quality of life.
  - There is no discussion about the quantities of available homes at these same prices, nor a discussion of the current housing market where homes are selling above listed prices.
- ❑ **FAILS** because ... it does not assess or address the impact on individual homeowners in the affected areas ...

73. Your comments are noted. Under the No Action alternative, the City would have to return to the planning process to evaluate transportation improvement options to alleviate traffic congestion on City streets between I-90 and Issaquah-Hobart Road.

**Issaquah South East Bypass****Issues and Discrepancies**

- ❑ **FAILS** because ... it provides conflicting information regarding property values, stating on page 4-189 of the DSEIS;  
"In contrast, construction of the Southeast Issaquah Bypass could adversely affect the value of developed properties (particularly residential properties) adjacent to the proposed project. Increased traffic volumes and the associated increase in noise, dust, and air pollution levels could result in lowering the perceived desirability of these properties."  
Yet, also on page 4-189; the DSEIS states;  
"Overall, the proposed project represents only one factor in determining future market value, and therefore is not expected to have a measurable influence on property values in the project area."  
Again, this **DSEIS completely FAILS to address the needs and impacts on individual homeowners** who will clearly be significantly negatively affected by the acknowledged "Increased traffic volumes and the associated increase in noise, dust, and air pollution levels" ....
- ❑ **FAILS** because ... it would allow ruining family homes and not even consider appropriate compensation .... **This is nothing less than robbery and is simply un-American.**
- ❑ **FAILS** because ... it does not address or assess the cost of litigation by home-owners in the affected area ...
- ❑ **FAILS** because ... on one hand it proposes to improve traffic flow and minimize environmental impacts, yet it actually promotes and allows for the construction of hundreds of new homes and the destruction of environmentally valuable forest areas without creating significant improvements in traffic flows.
- ❑ **FAILS** because ... it does not properly assess the **Visual Quality** impacts in chapter 4 to residences in the South C Alignment area
- The EIS indicates that only low to moderately low Visual Quality impacts exist, however, the reality is that approximately 14 homes would have **dramatically High Negative impacts**.
- ❑ **FAILS** because ... it improperly assesses the issue of Property Values During the Construction Period ...
- Stating in chapter 4 page 249 that "Adverse property value impacts would not be expected during the construction period, so no mitigation measures are recommended."
- ❑ **FAILS** because ... does not address the negative impacts of the proposed water detention pond to the residence directly next to the proposed site near 2<sup>nd</sup> Ave.
- ❑ **FAILS** because ... It does not address or assess the significant increase in **Safety Issues** directly related to the predictably large increase in traffic accidents at the intersection nearest to Issaquah High School.
- Based on Table 12 of the Technical Report and the traffic model predictions of figures 18, 19, and 20 ... it can be predicted that with the South C Alignment, the accident rate at the proposed intersection closest to the High School @ 2<sup>nd</sup> Ave and Front Street will have an increased accident rate of as much as 20 times the current accident rate.
  - With the South A Alignment, it can be predicted that the accident rate at the intersection closest to the High School @ 2<sup>nd</sup> Ave and Front Street will have an accident rate of as much as 2/3rds lower than the South C Alignment.
  - The South C Alignment places both parents and students at an unacceptable higher risk.



**Issaquah South East Bypass****Issues and Discrepancies**

- ☒ **FAILS** based on the criteria of Section 4(f) for Alternative Analysis (Chapter 5 pages 30 through 32)
- **The report fails to assess** the NO BUILD **plus Improvements** Alternatives, most of which do not use Section 4(f) resources.
  - **When compared to** the NO BUILD **plus Improvements** Alternatives, the present DSEIS proposal for the South C Alignment **Fails** the criteria specified in **Section 4(f)**. An alternative may be rejected as not being feasible and prudent for any of the following reasons:
    - It does not meet the project's stated "purpose and need";
    - It involves excessive construction costs;
    - It creates severe operational & safety problems;
    - It results in unacceptable social, economic & environmental impacts;
    - It creates serious community disruption; or
    - It results in an accumulation of a lesser magnitude of the previous factors
- ☒ And ..... It Uses Section 4(f) resources

**The only acceptable Alternative is the**  
**"NO BUILD" with Improvements**  
**Alternative!!**

Table 5-1

Section 4(f) Alternatives Analysis Summary

Alternative	Feasible and Prudent?	Uses Section 4(f) Land?	Relative "Net Harm" After Mitigation
1	No	No (N/A*)	N/A
2	No	Yes (N/A*)	N/A
3	No	Yes (N/A*)	N/A
4	No	Yes (N/A*)	N/A
5	No	Yes (N/A*)	N/A
6	No	Yes (N/A*)	N/A
7 (No Action Build + No Action)	No	No	N/A
<b>8 (No Build + Action)</b>	<b>Yes</b>	<b>No</b>	<b>Lowest</b>

\*N/A – Alternatives not feasible and prudent are eliminated from further consideration

**Alternative 7 (No Action)**(from page 5-32; this section should be rewritten to add )

Alternative 7 (No Action) is not considered feasible and prudent because it clearly does not meet the project's stated Purpose and Need to relieve existing traffic congestion on Front Street and improve mobility in the city of Issaquah.

**Alternative 8 (No BUILD + Action)**

Alternative 8 (No Build + Action) is considered feasible and prudent because it clearly does meet the project's stated Purpose and Need to relieve existing traffic congestion on Front Street and improve mobility in the city of Issaquah at the lowest cost and lowest negative impact.

C:\Documents and Settings\danielam\Back-Up Files\My Documents\SE Bypass\SE Bypass - Issues - Draft Version 071404.doc Page 42 of 43

**Issaquah South East Bypass**

**Issues and Discrepancies**

**Of the Build Alternatives;**

**The only acceptable Build Alternative is one using the “South A Alignment” with;**

- ❑ No “Park Pointe Development”!!**
- ❑ Only a 2 lane bypass!!**
- ❑ Move the proposed intersection at 6<sup>th</sup> Ave & Issaquah-Hobart road farther south!!**
- ❑ Significantly reduce the displaced homes!!**
- ❑ Properly Mitigate Sound and Visual Impacts to homes on 6<sup>th</sup> Ave!!**

❑ This would have the least impact on residences and other facilities

❑ This would have the least impact on resources and the environment

❑ This would have the least impact on schools and provide for the best safety

❑ Of the Build alternations, this would provide for the minimum amount of negative impacts, and yet still provide for an alternate traffic flow path around Issaquah. Only a two lane road is needed since the total traffic flow is already limited by Issaquah-Hobart Road to two lanes.

NOTE: This report is limited in scope due to the short period of time allowed for review and preparation. I could have extended this report by many pages if more time was allowed.

To: Connie Marsh, Issaquah Environmental Council

cc: Robert Shull, PTV America  
Bill Eager, TDA

From: Ross Tilghman

Date: 11 October 2006

Subject: Issaquah SE Bypass Peer Review

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I have reviewed the traffic analysis contained in the Draft Supplemental Environmental Impact Statement (DSEIS) for the proposed Southeast Bypass. Assisting me in this review were Robert Shull of PTV America, who reviewed the traffic model files, and Bill Eager of TDA Inc., who reviewed the transportation technical report. This memo summarizes our findings and observations about the analysis.

Our review is of these documents and files:

- Draft Technical Report, Southeast Issaquah Bypass, Transportation, December 2003. This report is included as Appendix F of Volume 2: Technical Appendices in the Draft Supplemental Environmental Impact Statement and Section 4(f) Evaluation, June 2004.
- T-MODEL files for the project dated from February 1998 to August 2002. These are the traffic model files used for the analysis in the DSEIS.

Additionally, I reviewed these earlier analyses:

- I-90 /Sunset Way Interchange Additional Access To Interstate 90, April, 1996.
- Final Transportation Technical Report, Southeast Issaquah Bypass Road, October 28, 1998.

### Overview

The project is narrowly focused – it is simply a technical assessment of the proposed southeast bypass which has been previously identified as a way of reducing traffic volumes on Front Street and other local streets by providing additional access to the I-90/Sunset interchange. The SDEIS is project-specific and is not meant to evaluate other options for their effectiveness in addressing Issaquah's transportation needs or to show how this project might work in conjunction with other modifications to improve traffic operations. A southeast bypass has been actively contemplated for over a decade.

---

Tilghman Group  
1776 NE 62<sup>nd</sup> Street  
Seattle, Washington 98115  
Voice & Fax: 206-577-6953

Page 1

## Summary

Our review finds that the analysis, including the computer modeling, is generally sound. While we found a few errors that should be corrected, and a few vague descriptions that should be clarified, we do not view them as invalidating the results. We offer particular recommendations to address errors and projected intersection capacity problems.

## Findings and Observations

Our review focuses on the adequacy of the approach taken, the appropriateness of the alternatives analyzed, sufficiency of detail, suitability of the traffic model, and the logic of the conclusions provided.

### *Adequacy of the Technical Approach*

The analysis follows standard transportation planning procedures for environmental evaluation of a new road. Its approach to incorporating existing traffic conditions, future land development within and surrounding Issaquah, and future traffic is fundamentally sound. Some vagueness occurs in discussions of sources of information, including, for instance, the traffic counts, but that does not indicate any important flaws in the analytical procedure.

### *Appropriateness of the Alternatives*

Within the definition of the project, a bypass between Issaquah-Hobart Rd. and Sunset Interchange, the alternatives appear reasonable and appropriate. While the configuration of the intersection with Issaquah-Hobart Rd. could influence traffic capacity and operating quality, the major differences among the alternatives have more to do with land use and wetlands than with transportation.

### *Sufficiency of Detail*

In general, adequate detail is provided to support the analysis. However, these items seemed vague or odd to us:

- ❑ Description of the project's purpose (p. 1) – perhaps it has been shown elsewhere but the text doesn't quantify the amount of pass-through traffic that uses local streets for which the bypass would provide a new route. There is no doubt about the heavy volumes using Front Street but, after so many years of study, the reader would expect a clearer identification of the problem.
- ❑ The perpetually missing discussion of local versus regional traffic demands complicates a reader's understanding of the costs and benefits of this (or any new) road proposal in Issaquah. Indicating, for example, trends in the amounts and locations of locally generated traffic compared to trends and patterns for traffic passing through the community would improve the reader's knowledge of traffic characteristics, leading to an easier understanding of the types and locations of needed improvements. A reference in the 1996 analysis to traffic diverting from Front to SR-900 is about the only indication of the kinds of problems that have

1

1. Pass through traffic was not explicitly identified in the analysis summary memo. However, the future peak hour volumes were developed using standard forecasting techniques that incorporate/reflect land use origin and destination zones and sub-area travel patterns. As such, the volumes projected for the future analysis scenario would represent both internal destination trips as well as traffic passing through the study area.



2

occurred due to congestion on Front St., but that information got lost in subsequent reports.

- The source and date for existing traffic counts is unclear. The text indicates on p. 9 that “traffic counts taken in early 2000” were used to calibrate the traffic model. We can tell neither exactly when those counts were taken nor who took them. I compared the DSEIS’s existing volumes with those shown in the Transportation Element Background Report to the Issaquah Comprehensive Plan and found them to be identical. However, the Comprehensive Plan indicates that its counts were made in the fall of 2001. One of those documents probably cites the wrong date.

3

- The text indicates that morning peak hour volumes were derived by applying afternoon volumes run in reverse (this somewhat oblique discussion occurs under the modeling section describing trip generation, not in the existing conditions section where it would be clearer and more obvious). Examination of the model files confirms that this is indeed the case. While it could be argued that this approach over-estimates morning trips, and therefore produces a conservatively high forecast, this method provides a convenient, but not accurate, analysis. It ignores activities such as schools and school zones that affect morning peak traffic but not usually afternoon peak traffic, neglects differences in trip types and travel patterns specific to mornings, and may, as a result, miss important intersection conflicts.

4

- No discussion or analysis of traffic performance on I-90 is provided. Model results indicate that by 2030 segments of I-90 will be very congested with speeds as low as 14 miles per hour. Nor is there any discussion of ramp metering and resultant queuing that might affect local streets. While the model approximates the delays incurred by metering, we do not know whether the Synchro modeling, which was not the subject of this review, includes the effect of ramp metering to show the queue potential and its effect on the ramp intersections.

5

- When showing LOS F results, the Level of Service tables do not indicate the full amount of delay. They simply show “>80 sec/veh” rather than showing the calculated value which might be much greater than 80 seconds. This masks differences between planning years and alternatives.

6

- The list of other transportation improvements assumed to be in place appears to be identical for both 2005 and 2030. This seems odd given the amount of growth anticipated. It also omits the proposed widening of SR-900 south of Newport Way which is due to be completed by 2009. When referred to Appendix C for the list of improvements assumed for 2005, the Appendix mentions a Table 2 but does not provide that table. In Appendix D, which addresses the 2030 street network, only projects in the 2001 – 2006 Transportation Improvement Program are listed.

7

- Numerous shifts in traffic occur as a result of the bypass but the patterns and consequences of those shifts are not well explained. For example, delay actually increases at various locations but the text provides confusing discussion (e.g., on p. 33 where it discusses the increase in traffic at the Front/I-90 WB ramps causing

2. Peak hour turning movement counts used as input data for the purposes of the traffic analysis were taken in late 2000. Counts identified in the City’s comprehensive plan may have been incorrectly cited.

3. In the absence of explicit AM peak period or peak hour data to establish morning peak traffic forecasts, a transposing of the PM peak period trip matrix within the demand model was deemed a reasonable approach for developing AM peak hour turning movement volumes. This approach was agreed upon through discussions between the consultant team and City staff and the resulting volumes were considered conservative and acceptable for the purposes of the traffic analysis work. While this process may not capture the full range of nuances and differences between morning and evening travel patterns (e.g. school traffic et al) it provides a practical estimate of overall traffic levels for projecting future traffic volumes and congestion levels.

4. The scope of this arterial study included the various I-90 ramp termini and operations related to the freeway on/off ramp movements at these intersections. Freeway analysis of mainline weaving, merging, diverging is expected to be captured as part of other effort that would potentially be led by the Washington State Department of Transportation (WSDOT).

5. The report only provides generic values for LOS F conditions in order to convey the fact that unstable delays would likely exist in the range of traffic operations break down and to avoid discussion of highly-variable results and analysis uncertainties. Although detailed traffic analysis results that show actual model-generated values can be provided upon request, this analysis would not be expected to change the general level of service projections for the SE Bypass alternatives.

6. The list of transportation improvements assumed for the 2005 and 2030 time horizons are similar due to the planning and programming associated with these projects. Only those improvements that were committed-to and funded at the time of the analysis were included in the list. The decision to exclude non-funded projects was agreed upon through discussions between the consultant team and City staff. The SR 900 corridor widening is identified and described in the roadway improvement list. References to Table 2 as part of Appendix C are indeed incorrect and were intended to reflect Appendix D (“Assumed 2001-2006 Street Improvements”).

7. Anticipated shifts in travel patterns due to the various alignments and intersection connections investigated were complex in terms of volume redistributions, delay impacts, and analysis findings/conclusions. The information presented in the technical report was intended to capture peak hour volume changes at the intersection-level so volume shifts were generally represented by turning movement. Data formatting for this traffic analysis summary was reviewed prior to and during report preparation. However no significant structural changes (to the report) were identified or required at the time the SDEIS was issued.

delay at the EB ramps, and on p. 44 where it attempts to explain the increase in delay at various Issaquah Fall City Road intersections by implying that less congestion will result in higher delay).

- An inconsistency occurs in Figures 9, 10 & 11, and in Figures 18, 19 & 20, in which southbound volumes on Issaquah-Hobart Rd decline with the Build Scenarios over the No Action Scenario. A check of the traffic model results shows that volumes do increase over No Action, indicating that the report's graphics are in error. Note also that Figure 18 has an error in the volume shown for the Second Ave/Issaquah-Hobart Rd intersection where it flips the southeast bound through and left-turn volumes.
- While the level of service ratings show good performance in 2005 at the bypass's intersection with Issaquah-Hobart Rd., the configuration of that intersection would differ substantially between South A and South C alternatives. South C would create a left-turn for southbound bypass traffic. Volumes in 2005 are extremely high for even a double left-turn lane (despite the LOS C result); by 2030, this intersection doesn't work. Similarly, South A sets up a high volume northbound left-turn from Issaquah-Hobart Rd. to Front Street for the morning peak period.

#### *Overview of Traffic Model's Suitability*

Please see PTV America's letter, attached, for their assessment of the traffic model. In short, they find that it is an appropriately detailed and constructed model to test the bypass. Only one error was noted: a faulty assignment for model zone 88 affecting approximately 67 trips. This should be corrected for any future analysis, but is unlikely to alter basic findings.

PTV America indicates that the model used consistent assumptions regarding physical street types and capacities to compare the No Action and Build scenarios. Their review shows that the capacities appear to be typical and appropriate for the various roads given the number of lanes and traffic controls, and do not reflect local policies concerning concurrency or other regulatory objectives.

#### *Reasonableness of Findings*

Overall, the findings follow logically from the assumptions and analysis. Based on review of the traffic model, the bypass would serve traffic moving from points south along Issaquah-Hobart Rd. to and from I-90, and to points north of Issaquah. Traffic on Front Street would drop with the bypass, as would traffic on Newport, Maple and Gilman in both 2005 and 2030 while anticipated volume growth on Second Avenue is averted. By 2030, the projections show volumes on Front Street being about 8% lower than they were in 2000. As such, the bypass fulfills its intended role of diverting through traffic from Front and other local streets.

The project obviously falls short of resolving congestion at the I-90 interchanges, and the increase in delay is acknowledged on page 33 of the report for 2005, and on page 51 for 2030. The report, unfortunately, does not relate that finding to the purpose and need statement. Extra delay would occur because the bypass causes shifts in traffic that affect

8. The traffic volumes summarized in Figures 18, 19, and 20 are indeed inconsistent with the background data reflecting future volume forecasts and are thus acknowledged. The volume discrepancy found in Figure 18 (southeast through and left turn volumes were flipped) is also acknowledged. Nonetheless, these inconsistencies do not affect the analysis results or conclusions of the report in any way.

these intersections, particularly traffic coming down E. Lake Sammamish Rd. that would turn onto I-90, then to the bypass. It seems reasonable to ask that the project not increase delay at Front/I-90 since the interchange is already so stressed. The larger context is that traffic growth outstrips road capacity all over Issaquah so that the bypass alone cannot meet anticipated demands. But a variety of modifications in addition to building the bypass could be coordinated to make things better. For example, different intersection design, such as modern roundabouts, could do much to reduce delay and minimize the number of lanes needed to move traffic.

### Recommendations

Looking forward, we offer these recommendations:

1. Update the computer model to a newer platform (if not already done). More modern models provide greater analytical power that can benefit planning for new facilities, especially in cases where distinctions between local and regional circulation need careful attention. When updated, the assignment problem in zone 88 can be corrected, and proper modeling of morning peak traffic can be accomplished.
2. Now that the opening year horizon is nearly a full year past, review the current status of land development and traffic volumes against the 2005 projections to determine if the forecasts have so far proven reasonable. If not, a new opening year would be appropriate for analysis.
3. Investigate methods to mitigate the extra delay incurred by the shift in volumes at Front/I-90 ramps (some turning movements actually increase in volume) due to the bypass, at the Sunset interchange and at Bypass/Issaquah-Hobart Rd. More creative intersection designs including modern roundabouts may help improve future traffic operations. Issaquah could benefit from innovative intersection treatments that provide more continuous flow, not just to handle the bypass changes, but to address the constraints imposed on the road system by topography and the added demands of approved land development. Such treatments may also alleviate the need for major widening at intersections, and contribute to better urban design.

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9. Your recommendations are acknowledged. The year of opening analysis has been updated to 2010 in the Final EIS. Additional changes to transportation modeling or analysis are beyond the scope of this document.

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CITY OF ISSAQUAH  
SOUTHEAST ISSAQUAH BYPASS

**COPY**  
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PUBLIC HEARING

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July 15, 2004

6:00 p.m.

Issaquah High School Commons  
700 Second Avenue Southeast  
Issaquah, Washington

KATHERINE M. CULLMAN, CCR 3001  
Court Reporter

Van Pelt, Corbett & Associates  
423 Second Avenue Extension South \* Suite 21 \* Seattle 98104

## I N D E X O F S P E A K E R S

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BARBARA JUSTICE 4004 243rd Place Southeast Issaquah, Washington 98029	10
ARIA CAHIR 580 Front Street South Issaquah, Washington 98027	13
BILL MORSE 585 Southeast Bush Street Issaquah, Washington 98027	15
ROD JONES 600 Mountainside Drive Southwest Issaquah, Washington 98027	17
JEFF MEYER 230 Capella Drive Northwest Issaquah, Washington 98027	19
TOM McDONALD 1227 Sunrise Place Southeast Issaquah, Washington 98027	20

\* \* \* \* \*

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Seattle, WA 98104

\* \* \* \* \*

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## STATEMENT OF KRISTIN PEARSON-FRANKS

My name is Kristin Pearson-Franks. I live at 24001 Southeast 103rd Street in Issaquah, just south of the city limits, just off the Issaquah-Hobart Road, where I've lived for 32 years.

My main concern that I want to talk about is the same one that I've brought up for the last, probably 15 years every time we've had an open house. I've talked to the county. I've talked to Pam Fox. I've talked to several other people. And no one seemed to be very concerned.

But when I saw David Kapler mention the same thing in the newspaper, I thought, okay. I'm just going to keep on this same issue. And that is: The Issaquah-Hobart Road is not slated to be expanded. And I am extremely concerned and think it's very irresponsible for the city to try to funnel those two lanes off the bypass going south, let's say in the evening, the southbound traffic on Second, although that won't be very heavy, I'm sure. But the southbound traffic coming down Front Street, which would be a lot of residents that come -- that work in Redmond and just continue down East Lake Sammamish and onto Front Street, will have four lanes funneling into the one little Issaquah-Hobart southbound lane, which already gets backed up when the weather's bad and when school's in session.

I just feel that when I talked to Pam Fox a couple years ago, she said that, Well, that's going to be the county's problem. Our

Van Pelt, Corbett & Associates  
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1. Your comments are noted and will be considered for the City's decision on this project.



1 responsibility is to help the city residents. Well, I think that is  
2 totally irresponsible. Number one, it's not helping just city  
3 residents. These are commuters who are coming from outside that are  
4 needing to get through town.

5 People who've lived here for the longest are going to be so  
6 impacted on Issaquah-Hobart Road, all the driveways that feed onto  
7 this Hobart Road. I don't know how any of those people are going to  
8 get out of their driveways. It's going to be dangerous. We've  
9 gotten -- we've heard of animals being killed on that road from all  
10 the traffic. Our dog was one of them. Jumped over our fence. It  
11 was fenced. It's already a dangerous road, so to add that much  
12 traffic to it, I think is -- is a recipe for disaster. And I think  
13 that to me, it should be so clear that this is not a well thought  
14 out plan.

15 Thank you.

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## STATEMENT OF CLARE HAYES

C-L-A-R-E Hayes, H-A-Y-E-S, 16610 246th Place Southeast,  
Issaquah, 98027.

Okay. Well, I did look at it. And I could not see -- I did  
not read the whole EIS. I certainly scanned it over and searched  
out certain areas that seem to be new. And one thing that really  
puzzled me as to how effectively it can work is a four-lane road  
going into two-lane roads. That just seems to be another  
bottleneck. But we'll leave that one. I don't see that that was  
addressed at all.

On the no-build alternative, it also had right below that, "no  
action." I thought a no-build alternative was supposed to have some  
sort of possibilities of ways of accomplishing a better flow of  
traffic with some suggestions of something. They just said that  
there are alternatives possible, but they didn't mention anything.  
That seemed to be a glaring minus.

Let's see. The retaining walls. They're going to be very  
massive. And after, you know, you look at what they say. They  
don't exactly say how they're going to make them. They leave it up  
to the engineering people. And I've been around a long time, and  
I've seen an awful lot of messes that engineers have done. I've  
seen some good things, too. But having lived in this valley for 35  
years, the surface or the soils of this valley are pretty subject to  
movement, particularly with water. And there's a lot of slopes that

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1. Your comments are noted. Traffic data for project indicate that Modified Alternative 5 would substantially improve north-south travel and accessibility to I-90 from Front Street and the proposed SE Bypass road.

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2. The No Action Alternative has been defined as a decision not to build the proposed SE Bypass, as indicated in Chapter 2 of both the SDEIS and the Final EIS. Planned projects that have been constructed or that are still proposed, and assumed under the No Action Alternative, also are identified in Chapter 2. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but are not reasonable because they are not effective in reducing congestion.

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3. Additional subsurface explorations will be done prior to designing structural walls for the northern project area. It is expected that a design level program can be developed to adequately address geotechnical and hydrogeological design considerations for the north end of the proposed roadway as the basis for

1 have a ton of streams that we don't even know about. And they do  
2 core drillings and things like that. But I still have very big  
3 doubts that once you take down everything, that the walls holding it  
4 are going to stay there. So you know, that, I don't feel, was  
5 adequately addressed as far as what is going to be different about  
6 this than it was up at the Highlands, when they can't find out what  
7 happened there, either.

8 And this is an extremely sensitive area, all of it. And it  
9 does say in the EIS that they define this whole area as an extensive  
10 recharge area. You take away the recharge, even with the mitigating  
11 ponds, I don't understand how that can possibly be sufficient to be  
12 able to keep this aquifer filled enough.

13 Those storm water retention ponds don't necessarily work well,  
14 either. Everything works well on paper. But, you know, reality is  
15 not paper. So I just am really concerned about that.

16 If they are sort of configuring this road to address in the  
17 future until 2030, I think it is, they can't take anything down  
18 Hobart Road as far as since that's county. You know, they can't  
19 adequately address that. But part of the mitigating effects of  
20 having a four-lane road here and a two-lane road there is pressure.  
21 Pressure on an aquifer. Pressure to build a four-lane road to match  
22 a four-lane road to match Route 18 which is a four-lane road. And I  
23 can't believe that that pressure isn't going to somewhere just sort  
24 of explode. And then we have no aquifer. We really don't. I'm  
25 sitting on the aquifer. And I've been used for a test of the

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4. Potential impacts on groundwater recharge were identified for Modified Alternative 5 and indicate that the proposed project would result in a 0.10 percent (1/1000) reduction of the total recharge volume in the Lower Issaquah Valley aquifer. If additional testing confirms infiltration potential for proposed stormwater ponds, no reduction in aquifer recharge would be expected because nearly all runoff from the proposed roadway would be eliminated.

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1 aquifer's ability to withstand its water. And it goes up and down a  
2 lot. You take away some of the recharge, and it won't be there.

3 They did say in Section 7.1.2 that the activities of building  
4 could have materially altered the creek in the amount of turbidity  
5 in the water. And they feel that that will not be too bad, you  
6 know. Well, may, may not. Except, you're going to have some  
7 various things that are possibly going to be coming into the water.

8 They say they can mitigate it, such as hazardous waste and things.

9 Don't know if they can. They didn't spell that out. And they also  
10 said in that same chapter, page whatever, Section 7, that the  
11 project will increase the runoff on the surface. And they're  
12 talking about that they were mitigating for a fifty-year flood.

13 Well, we had two, hundred-year floods in the '90s. So you know,  
14 what are you mitigating for? Something that we could never have  
15 another hundred-year flood because we had it in the '90s. So we  
16 only had two in the '90s. I sort of thought one should have been  
17 enough.

18 And there was no discussion that I could see how we're going to  
19 keep our air, our traffic, and everything else free of the garbage  
20 trucks. I realize that once you build the four-lane road, that they  
21 have every right to use it like anybody else does. But on Hobart  
22 Road you're going down to a two-lane road again. So the mitigation  
23 isn't there, you know.

24 I guess that's about it. I'm not thrilled. But then, a lot of  
25 people aren't and a lot of people are. But you've done good work.

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5. Impacts and mitigation measures for construction under Modified Alternative 5 are addressed in Chapter 3 of this Final EIS. Additional information on potential impacts and mitigation measures related to natural resources is described in the Concurrence Point 3 Package available from the City or at the City's website at: [www.ci.issaquah.wa.us](http://www.ci.issaquah.wa.us).

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6. The proposed project would provide a principal arterial for vehicles that do not require access to the City's downtown area. Many existing trips involve trucks using Newport Way which is classified as a minor arterial for most of its length. As a principal arterial, the proposed SE Bypass roadway would better accommodate truck traffic intended to pass by the city than would Newport Way. Vehicles now using Issaquah-Hobart Road would continue to do so until reaching Issaquah.

## STATEMENT OF BARBARA JUSTICE

My name is Barbara Justice, J-U-S-T-I-C-E. I live at 4004  
243rd Place Southeast in Issaquah, unincorporated King County.

I've been on the Chamber of Transportation Committee for a  
number of years. I've been on other transportation committees with  
the city for a number of years. And also I am one of the members of  
the Citizen Advisory Group for the East Lake Sammamish Trail and  
have been since the very beginning.

I have watched the deliberations over all of these years trying  
to fix traffic. And I've been quite dismayed that it takes so long.  
I'm not the kind of person that likes to take a long time with  
anything. And I know that we need to do our due diligence, and  
everyone needs to have their say.

I also have a bunch of very good friends who live at 6th and  
Lewis Lane. And so I am going to work very diligently to try to  
effect the alignment of the bypass. I believe that there is no  
other option, no other single option to relieve congestion in  
Issaquah. I have looked at many, many maps. I have talked to the  
gentleman who's done the coal mine surveys. He has flown over. He  
has walked over. And there just is not another viable place at this  
time. And I believe that it's going to be inevitable, that it's  
going to have to be done. It would have been nice if it was done 15  
or 20 years ago. But we can only go from today and get it done.

There are a number of people in the City of Issaquah and the

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1 surrounding area that are going to be very diligent in making  
2 certain that the mitigations are followed. And I don't believe that  
3 there's a person working on this project that doesn't want it to be  
4 the best project possible. So I think that we need to get on with  
5 it. We need to pick an alignment.

6 I hope that the council picks an alignment that saves the most  
7 houses. I don't think the cheapest way is the way to go. The  
8 people that have owned that property since 1900 would very much like  
9 to keep their property. There's no amount of money that will  
10 replace that property, so I have made a vow to them that I would  
11 work as hard as I could to get the best alignment. And I think  
12 that's 2, 4, and 6 that go down Second and out to Front Street.

13 I'm very dismayed with the laws of this state. Nothing can be  
14 done from Front Street south to expand the movement and forbid the  
15 building. I just don't understand why that has to be. And I'm --  
16 once this thing has settled, I'm going to start seeing if I can't  
17 figure out some way to needle the state to be able to allow that  
18 road to take more traffic without allowing the designation to change  
19 from what it is now, so that the building will happen.

20 I do believe that the staff at the city and the Public Works  
21 Department and in the other departments are competent. I think they  
22 are caring. I think they have listened to everyone. And I believe  
23 that keeping the pressure on will get a good project designed and  
24 mitigations to happen as best that they can.

25 I'm very concerned about the amount of water that we are using

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1. After issuance of the SDEIS, Modified Alternative 5 was chosen as the preferred alternative because it is the only build alternative that have impacts that can be effectively mitigated. The other build alternatives considered in the SDEIS are not effective in decreasing congestion and would have impacts considered unacceptable. Alternative 5 would result in the displacement of eight homes, all in the south project area. More information on impacts and mitigation measures under Modified Alternative 5 is provided in Chapter 3 of this Final EIS.

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1 up in this area. And I don't know what's going to happen with that.  
2 I don't believe that this project is going to hurt it at all. I  
3 think it's going to be cleaner water. And the same people that are  
4 complaining about the water also are complaining they don't want to  
5 have sewers. They want to use their septic tanks. And to me that  
6 is a very contradictory thing.

7 I'm very much an environmentalist, but that doesn't mean just  
8 do nothing. Because nothing often is worse than doing the right  
9 thing when you should do it. So that is my vote. I'm wearing my  
10 fix-traffic button.

11 I do believe also that we need to diligently work right  
12 alongside working on this bypass. We need to get every other type  
13 of traffic fix because this road is not going to do it. We're going  
14 to have to have everything. And that includes rail on the rail  
15 line. That includes bus. That includes all kinds of efforts to get  
16 people out of their cars and into public transportation. And I  
17 think we need to work on the rail line that is being proposed from  
18 Seattle to here because we have to look out to the future. And it  
19 seems like oftentimes we are just looking at too close of tomorrow  
20 rather than the long term. Even though some people are looking at  
21 the long term, some others aren't. And therefore, we're just sort  
22 of stymied.

23 Thank you very much for hearing my piece and good luck.  
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2. Your comments have been noted and will be considered for the Final EIS.



## STATEMENT OF ARIA CAHIR

My name is Aria, A-R-I-A, Cahir, C-A-H-I-R. And I live at 580 Front Street South. And that's Issaquah, 98027.

Okay. Well, I find the SDEIS to be flawed. And my biggest concern is when there's cost overruns, and basically it looks like there will be cost overruns, who's going to pay for it? And the only answer I've gotten so far is the citizens of Issaquah. And that seems very unfair to me that a road that's going to benefit people in Hobart and south and all over this part of the -- this part of the county are going to benefit. And it doesn't seem fair that the citizens of Issaquah are the ones who are going to have to shoulder that tax burden of building a very expensive project which will have cost overruns because every single one of these projects has cost overruns. And that's not addressed at all.

And then, just some secondary concerns I do have. I just moved to Issaquah in February from Seattle. And I was actually going to an artesian well up in Snohomish County for my water. I was taking sixty, one-gallon jugs up to Snohomish County to get my water because I don't like the Seattle city water. And here I just turn on my faucet, and it's incredibly delicious water. It's pure aquifer water. And apparently that's going to be compromised by this project. So that's another reason that I'm against it. And again, it's just the citizens of Issaquah who will suffer from that.

And then another consideration I have, where I was living in

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1. Funding for the proposed project has not been determined, but is expected to come from a variety of sources including state and federal grant money, as well as local revenues.

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2. Your comments are noted. As discussed in the Final EIS, potential impacts on groundwater quality are not expected to occur to a measurable extent as a result of the proposed project.

1 Seattle, the air quality wasn't very good. I was living near the  
2 University of Washington, and there's a lot of congestion around  
3 there. And out here, it's just unbelievable. It's not that far  
4 away, but the air quality is so much better. And with those garbage  
5 trucks going through with the diesel and everything, the air quality  
6 would be compromised.

7 And then, lastly, I'm just hitting sort of some salient points  
8 here. Where I was living in Seattle, because it was so densely  
9 populated, there was quite a bit of street noise, just ambient  
10 street noise. And this would be very, very noisy because you can  
11 hear I-90 all over the valley. And adding this bypass would just  
12 increase the noise, especially with those garbage trucks going  
13 through. And so the last thing I want to say is I believe the  
14 decision whether the bypass should be built or not should happen  
15 first. First, decide if it's going to be built or not. And then,  
16 if it's voted that it is going to be built, figure out which  
17 alternative. I don't understand why everyone's taking all this time  
18 and energy to discuss all the various options and at the very end  
19 vote whether it's even going to be built or not. That's  
20 counterintuitive to me.

21 So that's all I have to say.  
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3. Air quality modeling conducted for the proposed project design indicates that predicted worst case carbon monoxide levels for the roadway would be similar to existing conditions. Similar results are expected for particulate matter emissions resulting from the proposed project. The project is not expected to exceed National Ambient Air Quality standards either in 2010 at the year of opening, or in 2030.

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4. Your comments are noted. Traffic noise projections were modeled for the proposed project and impacts and mitigation measures are identified in Chapter 3 of this Final EIS. Although noise levels would increase in some locations near the roadway, increases are not expected to be substantial.

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5. The project has followed the standard NEPA EIS process where alternatives are identified and analyzed before a final decision on a preferred alternative is made. More information on alternatives considered is provided in Chapter 2 of this Final EIS.

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## STATEMENT OF BILL MORSE

Bill Morse, M-O-R-S-E, 585 Southeast Bush Street.

I was wondering if you guys had heard anything or -- about an Indian burial ground right behind the high school.

MR. BROCK: I can't say I have. But if that's an issue, you should address that in your comments. I mean, I can't really be exchanging information. So if you have things that you want to question, this is your opportunity to suggest that there are things that maybe are or aren't addressed adequately in the document.

(By Mr. Morse) Okay. I'll suggest they're not -- it's not addressed.

MR. BROCK: Okay. I'm just trying to help you along here.

(By Mr. Morse) I appreciate that.

MR. BROCK: Okay.

(By Mr. Morse) And it's not just like a figment of my imagination. I mean, I've seen the mounds facing south. And once you see one, you see about thirty of them. And, in fact, we -- we, a friend of mine, who's also a teacher at Issaquah High School, we videotaped it and took it up to the council in Snoqualmie. And they, I don't know, maybe it's because of their culture or something, they just said thank you. They didn't do much about it. It's not a brand new thing. Supposedly, there's a

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1. The City has received your comments and appreciates your input.

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1 history of the city going out and looking at them and this and  
2 that. So far, nobody's really said yes or no. And those mounds  
3 are, I mean, it's hard to believe it'd be natural.

4 Another thing is, I was -- I'd like to just put in. I'm sure a  
5 lot of other people are going to say this, too, about the lack of  
6 data of traffic since the -- what do you call it? Open the new  
7 interchange. What do you call it?

8 MR. BROCK: Sunset Interchange.

9 (By Mr. Morse) Sunset Interchange. It seems to me that when I go  
10 through Issaquah and since that's been there, things have really  
11 gotten a lot better. I think before -- I think they should take  
12 that into account and add it to their data, so we can have some  
13 more updated things.

14 And then, I was wondering, can I just ask you a question? This  
15 probably doesn't pertain to that.

16 MR. BROCK: Well, I'd be happy to answer some  
17 questions once you're done.

18 (By Mr. Morse) Okay. I'm done.  
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2. Future year traffic modeling did account for opening of the I-90 Sunset Interchange and potential traffic patterns based on that modeling were reflected in traffic volumes and other data provided in the Draft SEIS. Updated traffic modeling results for a new year of opening for Modified Alternative 5 are provided in Chapter 2 of this Final EIS.

## STATEMENT OF ROD JONES

My name is Rod Jones, and I live at 600 Mountainside Drive Southwest, Issaquah, on Squak Mountain.

I just wanted to testify in support of the bypass. I've been following the project since it began its major public debate about 1992. The project actually conceptually had been debated from the late '80s. I don't see a solution that isn't going to incorporate some sort of a north/south alternate bypass through the City of Issaquah.

I think the alternatives of widening Newport or improving bus solutions or diverting traffic around Highway 18 or down the 900 corridor aren't, in themselves, going to solve the problem. Traffic now stalled almost 30 to 45 minutes from the north side of Front Street through the town, clearly you can't expect Front Street to continue to sustain that type of growth and keep the business area viable and keep the city in a manner that's going to attract people to shop there and visit the theater and use it for restaurants. In fact, some of our own shopping has been curtailed in Issaquah because we can't get to some of the businesses after work in time before they close due to the traffic problem.

I think looking at the solution on the connector off of West Lake Sammamish up to Mt. -- Cougar Mountain and the new bypass that goes up -- the spar connector up to the Sammamish area, clearly these new road enhancements have served the purpose of

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1. Your comments are noted. Alternatives considered for the proposed project are identified in Chapter 2 of this Final EIS.

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1 reducing the traffic congestion on the existing arterials.  
2 So I'm really for the bypass. I think we've spent more than  
3 enough money to analyze the issues. Obviously, there's a debate  
4 on whether the statistics of the EIS are correct or not. I --  
5 looking at the numbers, I clearly believe that the numbers for the  
6 bypass solution are valid. And the mitigation for noise and  
7 ground water can be technically solved very easily with existing  
8 design practices.

9 My personal background is an engineer. I work in acoustics.  
10 I've heard some figures presented in the public testimony already  
11 that I don't believe are correct from those opposing the bypass.  
12 And knowing the existing technology out there for mitigating  
13 traffic noise, clearly there's technology out there that can keep  
14 that -- those levels from being intrusive or exceeding any sort of  
15 a criteria or guidelines that are required.

16 I would urge the city and the council to support the bypass  
17 and to make a decision and get moving on this. Twelve years of  
18 study and the number of millions of dollars that have been spent  
19 so far should be pretty conclusive in demonstrating we need a good  
20 solution. I believe the bypass is that.  
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2. Traffic noise projections were modeled for the proposed project and impacts and mitigation measures are identified in Chapter 3 of this Final EIS. Although noise levels would increase in some locations near the roadway, increases are not expected to be substantial.

## STATEMENT OF JEFF MEYER

My name is Jeff Meyer. I live at 230 Capella Drive Northwest in Issaquah, 98027.

I -- my comment today is strictly as a personal, a personal observation and not any organizations I belong to. I have one comment to give you tonight, and I'll be submitting written comments later.

And my comment is: Given the complexity of the SEIS and the intensity of public interest, it is reasonable to extend the comment period by 15 days at a minimum and hold an additional public hearing.

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1. Although a second public hearing was not held, a 55-day comment period was allowed for written comments on the SDEIS. The City of Issaquah has considered comments that were submitted after the close of the SDEIS comment period, including public input provided at City Council meetings during the time following issuance of the SDEIS and prior to beginning this Final EIS.

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## STATEMENT OF TOM McDONALD

My name is Tom McDonald, and I live at 1227 Sunrise Place Southeast, Issaquah, 98027. 425-519-6500.

I guess my main concern is with the EIS and the supplemental EIS's, Sections 4(f) and 6(f). And that addresses both the schools and parks. I think the impact to the gun club where our scout troop has been meeting, it's like an American thing to be able to meet there. And I think the impacts to that -- I have an elementary -- daughter in elementary school and a son in middle school and soon to be going to high school. And I think the impact of the roads and the particulates and the pollution and the physical impacts right next to the school is inadequately addressed.

And I think it's amazing that they can promote what started off as a two-lane road now being a four-lane road because they can't even address the capacity of what the original two-lane road is going to do next to the schools.

Without looking at -- I think it's not good. And I don't think that they addressed the option of improving Newport and Sunset or actually Sunset and Second Avenue at a much reduced price and cost, construction costs.

Even the public works, Bob Brock has said, Well, it's classified as a minor arterial. And if we're going to look at a 20-, 30-year solution, change classification. Heck, you know, we can do that easier than build a 45 million dollar bypass.

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1. Under coordination with the State Office of Archaeology and Historic Preservation during 404 Merger Process meetings, it was determined that Modified Alternative 5 would have no impacts on Section 4(f) historic resources. The City has coordinated with the Interagency Committee for Outdoor Recreation (IAC) regarding potential Section 6(f) resources, and the IAC has determined that grant conditions associated with these properties will have expired prior to potential SE Bypass construction. More information regarding impacts on historic and cultural resources, and recreational resources under Modified Alternative 5 is provided in Chapters 3 and 4 of this Final EIS.

2. and 3. Since issuance of the SDEIS, the City has met with School District staff to discuss mitigation measures for potential impacts on school facilities. Chapter 3 of this Final EIS provides information on impacts and mitigation measures associated with schools under Modified Alternative 5.

4. Alternatives considered and rejected during alternatives screening and 404 Merger Process meetings are discussed in Chapter 2 of this Final EIS. Expanding Newport Way to four lanes was considered in the 1990s, but was rejected. The use of Newport Way would not substantially improve congestion in the project area and would add vehicles to an already congested SR-900. The City did not consider 2nd Avenue because of its proximity to residential and other uses in the city, impacts to three schools, and its intended function as a minor arterial. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but are not reasonable because they are not effective in reducing congestion.

1 I guess I'm also mad that as a citizen in Issaquah, that I got  
2 to pay taxes to build the road that is not going to benefit  
3 Issaquah. It's going to benefit those that live south of town and  
4 congest I-90. Talus is not built out. Highlands is not built out,  
5 and I-90 is already packed.

6 And if you look at the traffic volumes at the interchanges at  
7 Sunset and at Front Street, they talk about the Southeast Bypass  
8 helping those. Well, a separate crossing is going to help those.  
9 But once this backs up, it's going to return to saturation, where --  
10 which is where Front Street is right now, it's at saturation. So  
11 it's really not going to help 15 years down the road.

12 I'm just mad as a taxpayer that I'm going to have to pay for it  
13 when it's not going to benefit me. It's not going to benefit where  
14 I live. It's not going to really benefit the restaurants and  
15 businesses that are in the downtown Front Street area of Issaquah.  
16 And I think it's something being ramrodded down our throats without  
17 looking at viable options that are using the existing street system.

18 That's it. I'm done.

19 [Meeting adjourned at 8:24 p.m.]  
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5. Comments noted. Traffic studies for the proposed project indicate that Modified Alternative 5 would substantially improve operations for north-south travel conditions and accessibility to I-90 from Front Street and the SE Bypass roadway.

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6. Your comments have been noted and will be considered in the City's decision for this project.

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C E R T I F I C A T E

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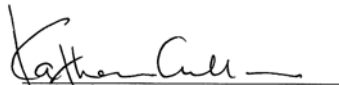
I, Katherine Cullman, a Notary Public in and for the  
State of Washington, do hereby certify:

That the foregoing hearing was taken before me at the  
time and place therein set forth;

That the statements of the speakers and all remarks made  
at the time of the hearing were recorded by me, and thereafter  
transcribed under my direction;

That the foregoing transcript is a true record of the  
statements given by the speakers and of all remarks made at the  
time of the hearing, to the best of my ability.

Witness my hand and seal this 22nd day of July, 2004.

  
Katherine Cullman, Notary  
Public in and for the State  
of Washington, residing at  
Kent. Commission  
expires April 26, 2008

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I, Katherine Cullman, a Notary Public in and for the  
State of Washington, do hereby certify:

That the foregoing hearing was taken before me at the  
time and place therein set forth;

That the statements of the speakers and all remarks made  
at the time of the hearing were recorded by me, and thereafter  
transcribed under my direction;

That the foregoing transcript is a true record of the  
statements given by the speakers and of all remarks made at the  
time of the hearing, to the best of my ability.

Witness my hand and seal this 22nd day of July, 2004.

  
Katherine Cullman, Notary  
Public in and for the State  
of Washington, residing at  
Kent. Commission  
expires April 26, 2008

Van Pelt, Corbett & Associates  
423 Second Avenue Extension South \* Suite 21 \* Seattle 98104

## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

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\* \* \* \* \*

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF KATI SHELTON

Kati Shelton. The latest EIS issued on the Southeast Bypass at a price of over \$3 million is essentially only a compilation of several EIS's done over the long history of this proposal. The one new outstanding statement, coupled with the usual need to relieve the traffic on Front Street, is that it will be part of a new regional arterial plan for a major north-south route which would promote development in areas south of and in the Issaquah Creek basin.

The residents here have steadfastly opposed this road because of its environment issues, but it continues to be promoted by business-oriented representatives who do not live here and are interested only in the development. Issaquah will lose its soul. Why should Issaquah provide a link to another north-south freeway? Why should Issaquah provide another route for vehicles which are only passing through and neither stop here or live here?

Besides providing little new information, traffic data used are from before the Sunset Interchange was opened. It does not recognize any impact of school buses and children driving their cars during commute hours. Nor does it adequately address the need to implement existing alternatives such as a bus service to the south, improving SR 900 and SR 18, and building an I-90 underpass to

1

1. As noted in Chapter 1, the purpose of the project is to reduce congestion on the Front Street corridor and improve access to I-90. Therefore, the project is intended to serve City residents and improve access to and from local businesses along the downtown portion of Front Street. The project is expected to improve mobility along Front Street and would be beneficial to City residents as well as others for whom stops in Issaquah would not be necessary.

2

2. Future traffic volumes for the potential year of opening and for future operations in 2030 accounted for the Sunset Interchange and potential changes in traffic patterns were reflected in the future volume projections.

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1 accommodate traffic to the Sammamish plateau. Since opening  
 2 the Sunset Interchange and summer vacation for school,  
 3 traffic on Front Street has moved freely and Second Avenue  
 4 is essentially free.

5 However, proven over and over, build another road, and  
 6 they will come. The Southeast Bypass will provide another  
 7 route for not only commuters but fleets of garbage trucks  
 8 and other commercial traffic. The effects of the noise and  
 9 air pollution in this enclosed valley will be drastically  
 10 increased in spite of best practices and only mitigation.  
 11 These do not solve problems. They only make them seem less,  
 12 while in the long run, have proven ineffective.

13 And worst of all, Issaquah will lose its soul: Its  
 14 beautiful West Tiger flank and remaining recharge area and  
 15 wetlands. So essentially Issaquah's water supply and  
 16 surface streams would be irrevocably compromised. The  
 17 northwest segment of this proposed road and the west slopes  
 18 of Tiger Mountain, it's certain the five springs that  
 19 supplied Issaquah's water until 1972, when its first wells  
 20 were drilled. The other western slopes are important  
 21 recharge areas connecting the drainage from perched aquifers  
 22 on the Tradition Plateau with the lower Issaquah basin  
 23 aquifer. The Issaquah Creek basin supplies much of the  
 24 water in Lake Sammamish, and it is of area-wide importance.

25 Rerouting and containment of groundwater is very

2

3

3. The proposed project is not expected to result in substantial impacts on air quality or noise. Please see Chapter 3 of this Final EIS for impacts on these elements under Modified Alternative 5.

4

4. The proposed project would include mitigation measures that are intended to prevent adverse impacts on groundwater and surface water quality. Additional subsurface exploration would be done at the design level stage to determine the design of structural walls in the north project area.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 difficult to predict, necessitating evicting residents from  
2 their homes and creating large containment ponds, which  
3 rarely function as we intended. Citizens are concerned  
4 about West Nile virus, spraying mosquitoes in standing water  
5 such as detention ponds. Spraying such ponds is needed for  
6 mosquito control. Better to leave the water in the ground  
7 or streams where this is not an issue.

8 The Southeast Bypass plan necessitates the removal of  
9 the toe of the hillside and the erection of a series of  
10 50-foot walls to prevent the glacial till above it from  
11 sliding.

12 As the EIS states, there will be increased mobility  
13 throughout the eastern portion of this city. But from the  
14 loss of quality of living, this is a deterrent not an asset.  
15 If approved, Issaquah will be saddled with debts for years  
16 to come; and its quality of life losses cannot be  
17 quantified. Please reconsider the no-build option with its  
18 own mitigations to move this traffic.

19 Sincerely, Group A Peace.  
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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

STATEMENT OF JOLIE B. IMPERATORI

My name is Jolie Imperatori. My address is 3122  
239th Place Southeast, Sammamish, Washington 98075.

I've been appearing in front of these type of panels  
and things for 33 years in the city of Issaquah, and I've  
always noted that the players change but their attitude  
stays the same. This EIS is almost perfect except for the  
project does not study in any manner the economic impacts,  
which are part of an EIS statement. And they're not  
addressed very well.

There is always a few vocal -- and they are a few. I  
have doorbell-ed the entire city of Issaquah for different  
political campaigns. And it's 75 percent of the people want  
this traffic relief -- that come to every meeting and are  
nay-sayers. They don't ever have an answer for anything  
except Do nothing and You're going to ruin our quality of  
life.

I've lived here more than most people who are in this  
room, and I can tell you that the quality of life has been  
very good. But it has grown. We're 13 miles from one of  
the biggest cities in the United States and one of the most  
growing cities in the United States.

There is one thing that has to be taken into  
consideration. It's not if this project is built but when.

1

1. Economic impacts for the proposed project have been addressed primarily in a qualitative analysis consistent with the scope of work for the environmental document. Information on economic impacts and mitigation measures for Modified Alternative 5 is provided in Chapter 3 of this Final EIS.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 And it will be built. And every time that we come to  
2 indecision and don't get it done, the price goes up.

3 Examples of this type of thing is I-90, which sat  
4 dormant for ten years. You could drive from Boston until  
5 North Bend. And the machinery was sitting up there rusting  
6 for ten years while some fancy attorneys stopped it down  
7 here on Mercer Island. That cost us billions of dollars,  
8 not millions -- billions. I-90 was built, the most  
9 expensive piece of roadway that was ever built in the United  
10 States because everybody fussed around long enough with the  
11 EIS that it got stopped enough times that finally Mercer  
12 Island got their oar in the water and we put a lid on it:  
13 The most expensive piece of highway built in the United  
14 States of America, for people who are sitting in this room  
15 with these balloons.

16 The sewer on Newport Way was stopped. They were  
17 going to put in a 30-foot sewer. This was when it was the  
18 county. Everybody got down there and stopped that. So they  
19 put in a 12-inch sewer 'cause those developers lived in  
20 sewers. Well, it was rebuilt to the cost of millions some  
21 years later when it was figured out it was undersized.

22 I have the use of the North Bypass. Let me tell you:  
23 It's wonderful. I don't sit in traffic for five or six  
24 lights spewing with my SUV out into the atmosphere. I get  
25 down here with maybe stopping at one light. I get down here

2

2. Your comments have been noted and will be considered in the City's decision for this project.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 in a matter of 6 minutes instead of 26 minutes.

2 And these people have an idea of how they're going to  
3 stop this and make it work for whatever idea they have. It  
4 will be built. The longer we take, the more millions of  
5 dollars it's going to cost. And it's irresponsible use of  
6 the taxpayers' money not to make a decision.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF JOAN PROBALA

Good evening. My name is Joan Probala. I live at 19218 Southeast 45th Place, Issaquah, 99027.

We are here tonight to just address the adequacy of the SEIS. I believe it's detailed, comprehensive, and does a good job of answering all the questions previously submitted by the community. Does it answer every question? No. Some questions simply cannot be answered until the road enters its design stage.

If the connecting road is built, it will be under extreme scrutiny during the process to ensure that every impact to the environment be sufficiently mitigated. The recent projects, such as the Sunset Interchange, only confirms this.

This does, however, present in detailed form statistics of what will happen to the city if this bypass is not built. It is clear from the projected numbers that traffic will increase at an alarming rate. Building or not building the road will not stop the active development taking place and planned for the Maple Valley, Hobart, Covington, and Black Diamond areas. If the developer of Park Pointe really wants to build, he will find a way to do it.

The SEIS proves that light synchronizing and

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 improvement to Second Avenue and Sunset Way will not, on  
2 their own, do enough to significantly relieve traffic  
3 congestion on Front. The number of cars are expected to  
4 rise too dramatically. The modeling proves this without any  
5 doubt.

6 The Southeast Bypass is the one alternative that will  
7 produce the greatest results, but it is only part of the  
8 plan. The Southeast Bypass must be built in conjunction  
9 with other measures to ensure the greatest relief. The  
10 bypass is intended to remove pass-through traffic and allow  
11 the citizens of Issaquah to enjoy the beauty of their  
12 community. The I-90 undercrossing will help residents move  
13 around the city. It will give no relief to traffic on Front  
14 or help pass-through traffic.

15 The study does leave some numbers that were in the  
16 original 2000 EIS. But those numbers were calculated on  
17 predicting traffic increase 20 years out. The Sunset  
18 Interchange was already planned. SR 18 was in existence and  
19 underused then as it is now. We are still experiencing  
20 traffic congestion with the recent improvements.

21 It is also clear from this SEIS that there will be a  
22 positive effect on air and water quality with the addition  
23 of the bypass. Cars will not be stalled along Front,  
24 contributing to engine emissions; and the  
25 stormwater-detention facilities will actually improve the

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 quality of water in Issaquah Creek.

2 The extensive documentation in the SEIS proves that  
3 the Southeast Bypass is necessary. The projected numbers  
4 are based on a proven, quantified formula. In evaluating  
5 the need for the north-south connecting road, one must  
6 consider the City's responsibilities to meet the  
7 requirements of the Growth Management Act in the already  
8 planned development and the already planned development at  
9 Talus and the Highlands. These developments, bringing  
10 thousands of new residents to the city, will be built.

11 The SEIS does a good job of laying out a picture of  
12 what our beautiful city could look like. It isn't very  
13 pretty. It is clear what the path should be. It is time to  
14 build the bypass.

15 Thank you.  
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1. Your comments are noted. As indicated in the SDEIS, the proposed project is intended to serve development already planned within the city and would be consistent with growth management policies.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF JIM SLOANE

My name is Jim Sloane, 26219 Southeast 31st Street in Sammamish, Washington 98075.

First of all, I just wanted to say that I am in support of the Southeast Bypass. I think the SEIS has been written well and it justifies that we move ahead with the highway.

The piece of information that is concerning to me is, we lived in this area for 16 years. I know that traffic is not decreasing. It's substantially increasing. I know I've sat in traffic on Front Street for 45 minutes trying to get through town. I don't think it's going to get a whole lot better. So I would just ask that you support the Southeast Bypass and moving ahead.

Thank you.

1

1. Your comments have been noted and will be considered in the City's decision for this project.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF JANE GARRISON

I'm Jane Garrison, 195 Front Street North, Issaquah, 98027.

It's been 20 years since I first opened my office on Front Street. I get to experience firsthand, all day long, the noise, the smell, and the chaos.

I've read the EIS, walked the preferred alignment, talked to civil engineers, and determined that this Southeast Bypass is a pretty massive construction. It only starts to become reasonable when you think of what we lose if we don't build it. We'd have to put highways -- with their attendant lights, striping, wide lanes, and big curbs up to today's standards -- to our old neighborhoods and maybe even down Front Street.

Our town and our environment, both, must be saved. We shouldn't spend more money and time on the EIS. Accept it and move on. The cost will only escalate as we ponder the perfect wording for our EIS. We need the best for our town. So let's accept it and use our money for more sensitive and better design options for engineering the road: Not necessarily alignments but maybe a terraced cross section, maybe a partial bridge or an overpass, perhaps enhanced wetlands in lieu of the engineered ponds. Who knows?

The EIS does not detail the possibilities, but I

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1. and 2. Your comments have been noted and will be considered in the City's decision for this project.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 wonder if it can't at this time because information won't be  
2 available until the design phase. However, acceptance of  
3 this EIS should not preclude additional possibilities.

4 The council is elected to lead and protect the  
5 community. We want our town back, and we look to our city  
6 council. This vote is difficult in the face of what seems  
7 our overwhelming emotional opposition. Please use rational  
8 thinking and vote to build this road.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF MICHELLE GIPSON

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3 Taking traffic off Front Street, my understanding is  
4 Newport Way was constructed for this purpose. I can see  
5 that Front Street is used for traffic to get from I-90 to  
6 May Valley, Kent, Hobart, et cetera. Why should we ruin the  
7 views of Issaquah by putting bypasses for people who do not  
8 live in Issaquah?

9 The smog, we live in a beautiful valley surrounded by  
10 Tiger, Squak, and Cougar Mountain. The smog from the extra  
11 traffic will stay low in the valley causing bad quality air.  
12 If you notice smoke from the fireworks resting in the valley  
13 the morning after the Fourth of July, it was not able to  
14 dissipate. I have noticed this for many years. It will  
15 only get worse with extra traffic going through on a daily  
16 basis. What will happen to this clean valley we're so  
17 fortunate to live in?

18 What is important to Issaquah? I have frequently seen  
19 deer, bear, rabbit, and signs of cougar, fox, and elk, not  
20 to mention the birds, squirrels and many more. We keep  
21 choking them out. The bypass will take the beautiful trees  
22 that make this town so beautiful, not to mention our homes  
23 and families.

24 It is ironic that I go to the City of Issaquah's web  
25 site and the first thing I read is the city vision

1

1. As noted in Chapter 1, the purpose of the project is to reduce congestion on the Front Street corridor and improve access to I-90. Therefore, the project is intended to serve City residents and improve access to and from local businesses along the downtown portion of Front Street. Thus, the project is expected to be beneficial to City residents as well as others for whom stops in Issaquah would not be necessary. Newport Way was considered among alternatives for the proposed project and rejected because of potential impacts associated with the potential need to widen the roadway. More information on alternatives screening for the proposed project is provided in Chapter 2 of this Final EIS.

2

2. The proposed project would not result in exceedances of National Ambient Air Quality standards for either the one-hour or eight-hour periods. Therefore, substantial impacts to local air quality are not expected to occur.

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1 statement. "The City of Issaquah is committed to quality of  
2 living through preservation and enhancement of the  
3 community's unique human and natural resources." Is this no  
4 longer a true statement? If not, then I have to wonder what  
5 kind of officials have we elected into office that would  
6 take the homes of families, wildlife, and the natural beauty  
7 that makes Issaquah in order to pave a road to make it  
8 easier for commuters to just pass through to the next town.

9 Thank you.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF DAVID IRONS

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2  
3 Thank you. David Irons, 27201 Southeast 27th Street,  
4 Sammamish, Washington.

5 To begin with, I'd like to thank the group that  
6 actually did do this Supplemental Draft EIS. I thought they  
7 did a thorough job of identifying the issues and the  
8 environmental impacts and also identifying the mitigation  
9 necessary to address those impacts.

10 As far as addressing the specific issues, as far as the  
11 draft EIS, the wetlands impacts that were identified,  
12 specifically in Option Six, turned out to be very small.  
13 And the proposals actually address them with two to one,  
14 where square foot that is impacted to actually mitigated by  
15 producing two more, which means a net gain.

16 As far as the issues that continually come up as far as  
17 stormwater -- which are very, very relevant -- actually are  
18 discussed in this. The good news is the City of Issaquah,  
19 King County, we have the strongest stormwater regulations  
20 virtually in the nation.

21 I'm vice chair of the King County Growth Management  
22 Committee. Even though we have the strongest regulations in  
23 the nation today, we're right now rewriting them, making  
24 them stronger, simply because we care about the environment.  
25 We care about stormwater and our communities.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 I've heard also questions that people brought up. I'd  
 2 like to clarify the issue as far as Cedar Hills and  
 3 potentially garbage trucks coming through Issaquah. It's  
 4 simple: We transport solid wastes from our transfer  
 5 stations to Cedar Hills. We will continue to do that 'till  
 6 year 2012, approximately eight years. At that point in  
 7 time, the plan is to shut down Cedar Hills.

8 But in the meantime, we will take the most effective,  
 9 the most cost-effective route, which is not through  
 10 Issaquah. That's been identified down 405 and out 169.  
 11 We've put a tremendous amount of money to improve Maple  
 12 Valley Highway to be able to facilitate that. And I've  
 13 talked to our solid wastes division. They've assured me  
 14 that it would be very, very un-cost effective to come  
 15 through Issaquah whether it has a bypass or not.

16 The question as far as the Issaquah-Hobart Road, we  
 17 have county regulations that says we will not expand  
 18 Issaquah-Hobart Road beyond two-lane capacity. It's against  
 19 our Growth Management Plan, which not one person has ever  
 20 suggested we modify to enable this. On the contrary, we are  
 21 right now updating our ten-year comp. plan. We have just  
 22 reinforced that we have no intention to allow anything like  
 23 that to happen.

24 Also just to help facilitate that, we have down-zoned  
 25 literally thousands of acres south of Issaquah and changed

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1. and 2. Your comments are noted and will be considered in the City's decision for this project.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 it from 1- and 2-acre lots to 5-, 10-, 20-acre lots because  
2 that's not where we want the growth to happen.

3 As far as the Draft Supplemental EIS found that the  
4 improving Highway 18 by expanding it, which I am in favor  
5 of, actually has very little impact in the city of Issaquah.  
6 I asked the King County Road Department to look and see what  
7 studies they had as far as traffic flow. They came back,  
8 and what they identified was that most of the traffic  
9 actually comes from Cedar Grove Road to May Valley Road that  
10 ends up coming down. So actually trying to force it out the  
11 18 is virtually impossible.

12 Thank you very much. And I appreciate your time  
13 today.

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3. Your comments are noted. Potential alternatives connecting to Highway 18 were reviewed and eliminated during the initial alternatives screening process for this project. Information on these and other alternatives that were considered is contained in Chapter 2 of the Final EIS.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF SUZANNE SUTHER

Good evening. My name is Suzanne Suther, and I'm with 155 Northwest Gilman Boulevard. I'll be Issaquah Chamber of Commerce.

The City of Issaquah has invested millions of dollars in exhaustive studies over the past ten years to propose solutions to relieve the traffic congestion. Meanwhile, the population of Issaquah has accelerated from 10,008 in 1995 to 15,223 by the year end 2003, with a projected population for year 2022 of 55,530 people.

The traffic plague in Issaquah has taken decades to reach this point. It is naive to assume that a community of our size can continue without an additional north-south road. According to the study, if the bypass is not built, traffic over 20 years is projected to increase an alarming 55 percent on Front Street South and 41 percent north. This traffic cutting through town is regional with no interest in our local goods, services, or well-being. The most responsible action for managing this wall of traffic is to build the bypass so people can come to Issaquah who want to be here.

The most critical obligation of the city under the Growth Management Act is to see that its transportation infrastructure is developed and reasonably concurrent with

1

1. Your comments have been noted and will be considered in the City's decision for this project.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 traffic generation. Present traffic counts through the city  
 2 suggest that other corridor improvements such as the SPAR  
 3 roads are performing as intended, but absence of the  
 4 Southeast Bypass is being felt acutely within the Front  
 5 Street corridor where congestion is worsening.

6 We acknowledge there is no perfect solution. However,  
 7 most of the arguments against the bypass are unfounded.

8 From the 30,000 cars per day on Front Street, we already get  
 9 poor air quality and groundwater pollution since cars are  
 10 forced to spend 25 minutes and sometimes more just driving  
 11 the 1-mile stretch through the city. Whereas, with the  
 12 bypass, the time is reduced to five minutes; and all of the  
 13 stormwater runoff will be treated to first-class condition  
 14 before reaching the aquifer. It will be a huge improvement  
 15 to the environment.

16 The study shows net benefits. In addition to  
 17 reducing traffic congestion, a state-of-the-art water  
 18 filtration system is planned. This will scrub runoff before  
 19 it enters our water supply. The project will double wetland  
 20 coverage in the study area. Any other impacts can be  
 21 responsibly mitigated.

22 I believe the study is adequate. We do not need to  
 23 study it to death. It is a regional issue. Use regional  
 24 dollars to fix it. Meanwhile, give us our city back. The  
 25 Southeast Bypass is needed now more than ever. Thank you.

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2. and 3. Your comments are noted and will be considered for the Final EIS.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF DON GEREND

Hi, I'm Don Gerend, 2959 224th Place Southeast in Sammamish. I'm also deputy mayor of Sammamish; but I'm here giving my own opinion, not necessarily the opinion of the council.

Looking at the traffic study in the Supplemental EIS using the SimTraffic software, it would appear to demonstrate a large reduction in traffic on Front Street and Second Avenue South if the bypass is built. The Supplemental EIS indicates that it would provide an important link in the regional roadway system, which is of huge importance to the residents north and south of Issaquah who unfortunately now are mixed with local traffic, school traffic, and shoppers. Growth north and south of Issaquah will only exacerbate the gridlock already existing.

My family has lived in Sammamish for 25 years. We've shopped in Issaquah for those 25 years. We've dined in Issaquah. We have our automobiles repaired in Issaquah. In fact, I have to take my truck over to Evergreen Ford right after this meeting. We go to the theater. We join the hatchery. We love Issaquah. And we'd like to see that continue.

The bypass will make it easier for us to come down to Issaquah to shop, dine, and enjoy the wonderful assets. The

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 bypass, plus other enhanced road connectivity plus  
2 pedestrian and bike facility enhancements, will preserve and  
3 enhance the livability of Issaquah.

4 And the other question I have on it is: I was looking  
5 at the south alignment, which comes back out through Second  
6 Avenue Southeast. And I would ask the planners to consider  
7 the possibility of a roundabout at that intersection.

8 Thank you very much.  
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1. Your comments have been noted and will be considered in the City's decision for this project.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF JACKIE THOMAS

Jackie Thomas, 3105 Douglas Court Southwest here in Issaquah.

We have been through the experience of building Issaquah Highlands and the Sunset Interchange. And what have we learned? Nothing according to the SDEIS.

The stormwater systems in the Highlands has failed several times, even though millions have been spent. And we have had two associated landslides there. The Sunset Interchange project had over \$30 million in cost overruns. And it still has unsolved detention-pond problems. Aquifer recharge, the source of our drinking water, has been compromised by these projects. How much, we are only beginning to know.

The Southeast Bypass gamble will be over the last, best piece of our aquifer recharge, the last, best source of our scarce local drinking water. The terrain of the bypass is similar to that of the nearby Highlands and Sunset Interchange. It is disingenuous not to expect the same challenges and problems and cost overruns with the bypass gamble. Yet the SDEIS ignores the experience of these neighboring projects.

According to the press, our mayor has said: "Until you actually get something on the ground, you may not know

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1. Potential impacts on groundwater under Modified Alternative 5 have been evaluated in Chapter 3 of this Final EIS. The proposed project is not expected to result in substantial impacts on groundwater recharge. If future testing confirms that infiltration would be possible at proposed stormwater facilities, no reduction in aquifer recharge is expected because nearly all runoff from the proposed roadway would be infiltrated.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 exactly what you have. I've seen that time and time again,"  
2 unquote. The bypass gamble will slash through a priceless  
3 piece of Issaquah, cause irreparable degradation to our  
4 environment, and put our school children's health at risk.  
5 The bypass will degrade quality of life, both for citizens  
6 living in the valley and on the mountain hillsides. I live  
7 on Squak Mountain, yet I hear trucks downshift on I-90, ten  
8 minutes away. I expect to hear more if the bypass gamble is  
9 built.

10 This project will suck up all of our transportation  
11 dollars that could be used for real transportation fixes in  
12 Issaquah. We have an Issaquah bypass already. It's SR 18,  
13 and it's faster today to use it. Unlike the bypass gamble,  
14 it has no stoplights to impede traffic flow, and its walls  
15 won't replace our treasured forested hillside.

16 If we construct this risky project, Issaquah will be  
17 irrevocably changed. Issaquah Municipal Code states:  
18 "Balance environmental concerns with developmental pressures  
19 without allowing development pressures to override  
20 environmental concerns." The bypass gamble violates this  
21 provision in our code.

22 Thank you.  
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2. Your comments have been noted and will be considered in the City's decision for this project.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF PHYLLIS SCHAFF

I'm Phyllis Schaff. I live at 375 Southeast Bush Street in Issaquah.

I came prepared just to talk about a very small piece of the EIS. I'm against the bypass, but I didn't think this was the place for us to give our opinions on that but we were supposed to discuss the DEIS.

I've tried to read parts of this. I haven't read the whole thing. But I'm concerned because the devaluation of homes and property in old town apparently has not been addressed. With just the expectation of the bypass being built, there has already been negative impact on real estate sales in our neighborhood. Old town neighborhoods and businesses will have new views, concrete retaining walls, some of them 50 feet tall; constant traffic noise; air pollution; and most probably, flooding. I can't find that any of this has been discussed in the DEIS or that any mitigation has been proposed to protect this heavily impacted neighborhood.

The DEIS shows the view quality from Sixth and Bush streets with a 0.08 reduction. "0.08," what does that mean? From a green, forested hillside to gray concrete is a 0.08 reduction in visual quality? Nobody's buying that. It's totally unreasonable. Please re-evaluate this and address

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1. As indicated in the SDEIS, it has been acknowledged that the proposed project may influence decisions for some real estate purchases in the project area. It is further noted that several factors influence property values, including economic conditions. Overall, the proposed roadway is expected to have only a minor influence on property values and would not substantially affect the Olde Town neighborhood.

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2. The SDEIS visual analysis followed appropriate state and federal procedures and was reviewed and approved by the FHWA and WSDOT prior to issuance of the SDEIS. As the SDEIS indicates, view ratings may be subjective and dependent on individual viewer sensitivities. In the northern project area the existing topography and vegetation, combined with distance from the immediate project site, combine to obscure or diminish views in many locations. These elements were primary factors that resulted in estimates of low visual change ratings for locations such as Sixth Avenue and Bush Street. Several view angles were considered and scores in the visual analysis frequently reflect averages of the total view ratings. Because visual rating scales generally rank values in terms of whole numbers, averages of less than one indicate that views are not expected to change greatly.

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SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 the reduction in the livability and the value of our homes.

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2 Thank you.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF DAN LAMANUZZI

940 Second Avenue Southeast.

I believe the Supplemental EIS report fails technically in many areas, only two of which are noise issues and safety issues. The report fails to properly assess and address noise issues related to the South C alignment, and its data simply is inaccurate. It improperly assesses the impact of forcing vehicles to the proposed south Z? C? Intersection at Second and Front Street, which would be directly adjacent to existing residences, within approximately 30 feet of bedroom windows.

Contrary to what the report claims, the noise levels would exceed the allowable dBA limits. I've personally performed noise-level measurements using a calibrated noise-level meter, and I've also modeled the predicted noise levels using an internationally accepted traffic-noise modeling tool. My model values are for 10 meters from the curbside, which is approximately the distance from my bedroom window to the proposed curbside.

Measurement and model values correlate very well, whereas the EIS values do not. Note that the model values in all cases are considerably lower compared to actual measured values. Note also that when the EIS actually measured values in October of 2002, it was 68 dBA at the intersection of Second and Front Street. Yet the EIS

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1. In response to comments regarding the general accuracy of the noise analysis, PB reviewed both the noise models and the analysis prepared for all of the alternatives evaluated in the SDEIS. No inaccuracies in this analysis were identified during the review. The issues that were highlighted in the Lamanuzzi comment letter are explained in the response presented above, and were not found to invalidate the previous noise modeling or analysis.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 predictive model for the year 2030 is only 66 dBA,  
 2 conveniently one dBA below the maximum allowable level.  
 3 With the forced increase concentration of traffic through  
 4 this interaction, the EIS model is clearly inaccurate.

5 My model values for the years 2005 and 2030 is a far  
 6 more accurate and realistic value. And they demonstrate  
 7 that allowable limits will be far exceeded. Most of the  
 8 homes in the proposed intersection area do not have air  
 9 conditioning. It is perfectly normal and typical to open  
 10 windows at night. This increased noise will simply make  
 11 these homes unlivable.

12 Regarding safety, the report also fails because it  
 13 does not address or assess the significant increase in  
 14 safety issues directly related to a predictably large  
 15 increase in traffic accidents at the intersection nearest to  
 16 Issaquah High School. It can be predicted that with the  
 17 South C alignment, the accident rate at the proposed  
 18 intersection closest to the high school will have increased  
 19 levels of accidents at the rate of as much as 20 times the  
 20 current rate. With the South Alignment A, it can be  
 21 predicted that the accident rate at the intersection closest  
 22 to the high school will have a rate of as much as 2/3 lower  
 23 than the South C alignment. The South C alignment places  
 24 both parents, children, and students at an unacceptably high  
 25 risk. Thank you.

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2. South A is the selected preferred alternative alignment for the southern portion of the project area.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF LINDA SEEBETH

My name is Linda Seebeth.

Of all pollutants found in Issaquah's air, two pose the greatest health risks, especially for our children. Those two pollutants are particulate matter 2.5 and ground-level ozone. The EIS, however, only looks at carbon monoxide, which has not been a concern for at least ten years in the Puget Sound region. And even though measured data is readily available from Puget Sound Clean Air online, unbelievably the carbon monoxide is only used in the predictive models.

Particulate matter was the primary pollutant in the Puget Sound air shed on 276 days last year. The American Lung Association issued a state of the air report a few months ago, and Seattle was named one of 25 most polluted metropolitan areas in the US for particulate matter, which is scientifically linked to asthma, cancer, and heart problems.

What is the primary source of particulate matter in our region? Vehicle emissions. Think of the plume rising from the exhaust pipe of a truck if it accelerates at a signal light. The bypass would have three signal lights, yet the EIS has no data, no measurements, no modeling of how much particulate matter the road would generate.

1

1. Your comments are noted. Air quality modeling data was used to determine potential impacts associated with the proposed project. Please see the Air Quality section of Chapter 3 of this Final EIS for potential impacts associated with Modified Alternative 5. The proposed project would not result in exceedances of National Ambient Air Quality standards for either the one-hour or eight-hour periods. Therefore, substantial impacts to local air quality are not expected to occur.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 The second air pollutant in our region is ground-level  
2 ozone or smog, which makes breathing difficult, especially  
3 for sensitive groups such as active children. The highest  
4 levels of ozone are frequently recorded at the North Bend  
5 monitoring station. Why? Because Seattle pollution drifts  
6 to the foothills and gets stuck. Ozone was the highest  
7 pollutant on 86 days last year, yet the EIS has no data, no  
8 measurements, no modeling of how the vehicle emissions  
9 generated from the bypass would add to ground-level ozone.

10 Health experts suggest ways of offsetting ozone and  
11 particulate matter. They advise: Plant trees. But  
12 building the bypass would remove trees that currently offer  
13 a protective surrounding to the hundreds of children in the  
14 schools below. Health experts advise: Don't allow vehicles  
15 to idle. But the bypass has signal lights where cars and  
16 trucks would be idling when, as predicted, the road would  
17 still be clogged with traffic. Health experts advise:  
18 Don't let children play near streets with heavy traffic.  
19 But the bypass will be right above playgrounds and athletic  
20 fields where pollutants would fill the sensitive lungs of  
21 growing children.

22 Students from all over the district will be exposed to  
23 increased pollution when they play on Issaquah High School's  
24 tennis courts, baseball, track, and football fields. Even  
25 if the bypass would fix traffic, which we know it really

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 won't, the risk to our children's health would not make it  
2 worth building.

3 City officials, please, listen to your own common  
4 sense and make a stand for the children of our community.  
5 The sprawl bearers who carry great power in the state  
6 economy want you to look at the bypass through a very narrow  
7 lens. Instead, please look through a wide-angle lens. What  
8 is the best thing for this community? What do we value?  
9 How do we measure the quality of life? By speed or by our  
10 children's health? Please, no more money wasted on this  
11 road.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF SUSAN MEYER

Susan Meyer, 230 Capella Drive Northwest, Issaquah, 98027.

Traffic modeling is really only as good as the numbers that are put into it. I could not find anywhere in this SEIS where it discusses the assumptions that were used during the traffic modeling. Does it take into account the people that would use the bypass that currently don't come through Issaquah because the traffic is clogged, another one of those build-it-and-they-will-come scenarios?

It appears to me that the traffic numbers are outdated in the SEIS. They were done before the Sunset Interchange, which in my opinion has changed traffic patterns. Also SR 18 is currently being widened south of Issaquah-Hobart Road; and between Issaquah-Hobart Road and I-90, the planning is underway. It's well underway. The permitting agencies have been contacted, and that road is going to be widened soon.

We need to take measures to get people to use these new, improved roads; and also I-405 is also being planned for widening. So if we can get people to use the new, improved roads, the big roads, and not build a new one through our community, that would be the preferred alternative.

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1. Information on traffic modeling methodology and assumptions for the proposed project is provided in the Transportation Technical Report included in the SDEIS Appendices. Additional information on traffic impacts associated with the proposed project is provided in Chapter 2 of this Final EIS.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 We should be taking all measures we can to deter  
 2 commuter use through our town. The toll alternative, to me,  
 3 was not properly addressed in the DEIS or the SEIS. We  
 4 don't need a toll booth. There are electronic stations that  
 5 can be implemented. We can put one at the south city  
 6 limits, for example.

7 A roundabout at Front Street, I don't know. It might  
 8 be tight. But has that option been explored? A new  
 9 north-south crossing of I-90, what would that do to traffic  
 10 numbers? Some of these have, I believe, not been explored  
 11 in the SEIS.

12 Also, I do not see anywhere in the SEIS about impacts  
 13 to I-90. Currently I-90 is clogged between the Sunset  
 14 Interchange and Bellevue during peak hours. And by pouring  
 15 additional people onto I-90, it appears to me that that  
 16 issue should be explored. It would be cumulative impacts on  
 17 air quality and just the quality of commuting.

18 The visual quality ratings appear to be addressed only  
 19 within the proposed corridor. But what about the people  
 20 across the valley that live on Squak Mountain? Also the  
 21 infiltration ponds would be next to the Sunset Interchange  
 22 infiltration ponds that are currently failing.

23 Thank you.  
 24  
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2

2. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but are not reasonable because they are not effective in reducing congestion.

3

3. Existing and future traffic volumes on I-90 were considered in the traffic modeling for the proposed project. The proposed SE Bypass is intended to address existing traffic conditions in Issaquah and is not expected to adversely affect traffic on I-90. Cumulative impacts on air quality are addressed in Chapter 3 of this Final EIS.

4

4. SEIS visual analysis followed appropriate state and federal procedures and was reviewed and approved by the FHWA and WSDOT prior to issuance of the SDEIS. Because Squak Mountain is located several hundred feet south and west of the proposed project's southern boundary, specific view impacts in that location were not considered. Distance and topography from that area would limit views of the proposed project. It is possible that portions of the proposed roadway would be visible from the Squak Mountain area. However, the project is not expected to substantially affect visual quality there.

5

5. In the revised stormwater analysis the proposed stormwater pond near East Sunset Way was evaluated as not providing infiltration. Additional testing at the design stage would help determine the final characteristics of the proposed pond, and with appropriate design, it would be expected to adequately address stormwater needs at that location.

## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF BRYAN WEINSTEIN

My name is Bryan Weinstein, 285 Southeast Bush Street.

I'm not a scientist, but these facts are still interesting to me. "Biological Assessment," section 71.5 identifies the road as a barrier to wildlife migration within the base of Tiger Mountain. It says: "The road will tend to drive away animals that are not tolerant of the additional disturbance and noise." Then Section 7.2 identifies the avoidance measures but not for the wildlife in question. In fact, no document identifies the, quote, "conservation measures," unquote, that this section speaks to. It's left out. Instead, a mitigation is proposed to build an artificial wetland. But if the noise drives the wildlife away, how will this wetland ever be used?

EIS on air quality, page 4-4, indicates that the air-quality monitoring meters were 3 and 12 miles away. That's not really measuring air in Issaquah, is it? The particulate-matter monitoring station is 15 miles away. That's okay because that station didn't work in the years 2000, 2001, or 2002. What kind of conclusions can really be drawn from this inferior data?

This section on air quality concludes that in some locations air quality would improve due to future decreases in emissions, though it would be offset by increases in

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1. Comments noted. Potential impacts on wildlife have been acknowledged in the SDEIS and are addressed for Modified Alternative 5 in Chapter 3 of this FEIS. Through discussions with state and federal resource agencies during the 404 Merger Agreement meetings in 2005, the City has agreed to initiate and participate in a study and planning effort to better understand regional wildlife movement and connectivity issues.

2

2. Air quality analysis followed accepted state and federal practices. Monitoring stations identified were the closest such stations to the proposed project and provide pollutant data relevant to the proposed project area.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 emissions from growth and background traffic and slower  
 2 vehicular speeds elsewhere. But with what we know about EPA  
 3 rollbacks in air quality and our love of SUV's, as some of  
 4 the people from the other side have carefully noted, this  
 5 statement is totally bogus.

6 I could not see where the EIS identifies any change in  
 7 the ambient air temperature by the construction of a large  
 8 heat-reflective surface, asphalt, installed in a  
 9 second-generation-growth forested hillside: The west slope  
 10 of Tiger Mountain that rain clouds collide with and helps  
 11 provide for the temperate climate that we have. Clouds  
 12 don't go where there is heat. No clouds, no rain. No rain,  
 13 no water. No water, no need for detention ponds. But if we  
 14 don't have detention ponds, how do we put the water back in  
 15 the aquifer? Where was this considered?

16 Have there been other public-works projects like this  
 17 in similar geography, topology, and hydrology anywhere in  
 18 the world? How did they end up? If we're the first, are we  
 19 innovators or just ignorant?

20 I read these documents with the purposeful narrow  
 21 scope and found them filled with great generalizations and  
 22 wonderful prose, especially the part about downtown Issaquah  
 23 and how it was years and years ago. But the evidence is  
 24 irrefutable to anybody who reads this: This road just won't  
 25 work. And these documents are yet another example of the

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3. The proposed project would result in a small addition to impervious surface area in the city and is not expected to result in substantial changes on local temperatures and weather conditions.

4. The SDEIS and this Final EIS provide project-specific information on potential impacts related to the proposed roadway. Research of other roadway projects in other jurisdictions was not considered and is beyond the scope of these environmental documents. For impacts related to Modified Alternative 5, please see Chapter 3 of this FEIS.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 acceptance of mediocrity as perfection that Issaquah, the  
2 Chamber of Commerce, and some people in King County have  
3 such an obsession with lately.

4 I'm so mad about this road. I'm very angry about it.  
5 I'm tired of people from King County, land developers who  
6 live here, and our Chamber of Commerce treating our land,  
7 our resources, and our property taxes as if it was a public  
8 convenience like a fucking toilet.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF DAVID VINEBERG

I'm David Vineberg, at 230 Southeast Bush in Issaquah; and I'd like to speak to a couple of concerns I have about the impact statement.

First, I have a concern that short-term cost-effective solutions were not enumerated in this document at all, in particular, the removal of all five parking spaces in front of the library on Front Street or the possibility of removing on-street during rush-hour times on Front Street. These are the kind of solutions that could be taken at low cost to relieve traffic issues today rather than spending millions and millions and millions of our money, the property owners here in Issaquah.

And the tax benefits of this project versus the benefits -- the tax costs of this project versus benefits, to me, look pretty negligible. But I'm here to speak to the Environmental Impact Statement itself. In particular, other alternatives, as far as improvements on Highway 18 and the traffic impact of the four lanes from Highway 18 to Hobart Road do not seem to be adequately covered. Before we press ahead and spend the millions of dollars that this project entails, I ask that we do really consider these alternatives, including the alternative of the No-Build Option. Thank you.

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1. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but are not reasonable because they are not effective in reducing congestion.

2. Alternative alignments for the EIS evaluation were selected in 1997. Mitigation measures are considered for the No Action alternative in the SDEIS. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. See Chapter 2. The no-build alternative doesn't involve building other alternatives; it's simply a rejection of the SE Bypass. Should the no-build alternative be selected, the planning process would need to re-evaluate the previously rejected alternatives. Based on current information the likely outcome is that other identified alternatives will be less effective than the SE Bypass.

## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF MARILYN BATURA

My name is Marilyn Batura. I live at 975 Front Street South, Issaquah.

I'll attempt to keep my comment technical in content. However, I have a vested interest. Under the Alignment A South, my home will be removed for wetland creation. Under Alignment C, ingress and egress to my home and my neighbors' is seriously impacted.

This document does not consider the No-Build Option as a viable alternative. If the proposed roadway is truly streamlined, why wasn't Second Avenue South? Since the Sunset Interchange opening, it is being utilized. As a daily rush-time commuter, I've observed a fairly even distribution of traffic within Second, Newport, and Front Street. I have never sat in a 25-minute wait. I'm usually at my home, only one mile south, within five minutes.

The Issaquah valley is unique, and it is fragile. The best planning and science has failed us in the past. That is why the mitigation in the EIS seems meaningless. Most of you are familiar with the recent Issaquah Highlands/Camp Creek blowout and the state's infiltration pond at the Sunset Interchange that does not function as it was designed.

As a lifelong resident, I have witnessed numerous

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1. Mitigation measures are considered for the No Action alternative in the SDEIS. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but are not reasonable because they are not effective in reducing congestion.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 engineering and design failures in our city. Just to name a  
2 few: Summer Hills Project, Newport Way, small stream  
3 diverted for development. After the seasonal rain, the  
4 stream returned to its former channel, undermining the  
5 home's foundation. Another city water reservoir at SR 900  
6 and Newport Way, upon completion, before filling with water  
7 the parent tank was migrating downhill. The lawsuit pitted  
8 the geotech engineering firm against the contractor. The  
9 city paid in the end. The foothills if Issaquah, lower  
10 Squak Mountain development, the hillside began to slip and  
11 slide after it was denuded of the vegetation and before the  
12 construction began. The development was scaled back due to  
13 the slide situation.

14 This proposed roadway is far too costly on many  
15 levels. We have spent nearly 4 million in planning and  
16 study. The anticipated construction costs are between 35  
17 and \$50 million and primarily unfunded. If the council  
18 votes to obligate the citizens of Issaquah to funded the  
19 majority of this project, and we're forced to choose between  
20 a major school levy, an I-90 undercrossing, or this roadway,  
21 I predict this project will come in in last place.

22 And finally, the immeasurable environmental losses to  
23 the community, these are permanent, not just for today or  
24 this year, but for generations.

25 I'll close on a positive note: We do want to see the

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1 Rainier Trail extended past Second Avenue to the Issaquah  
2 Alps, not as a sidewalk migrating onto a four-lane roadway.  
3 But we do want to retain the forested hillside and protect  
4 the aquifer. We do not want to drink water piped in from  
5 Lake Tapps. We do want the city council to represent the  
6 citizens and uphold the goals that are stated in the  
7 comprehensive plan.

8 Thank you.  
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2. Your comments have been noted and will be considered in the City's decision for this project.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF EILEEN BARBER

Good evening. Eileen Barber, 585 Mount Index Place,  
Southwest, Issaquah.

I am here this evening to speak to the adequacy of the  
DEIS for the Southeast Bypass. I have read the document.  
The DEIS is a very thorough, comprehensive document that  
should be amended with this evening's comments and pass.

Any project of this size will have impacts. None are  
so great that they cannot be mitigated. In reviewing the  
DEIS, there are areas of great concern to this community:  
Air quality, water quality, and noise. These have all been  
carefully studied in the DEIS.

There are some important statements in the DEIS that  
need to be brought up this evening. Air quality is  
addressed very well on page 4-6 in two different statements,  
and I quote: "Reduction of congestion on Front Street  
should result in the reduction of CO concentrations along  
Front Street for all build alternatives as opposed to the  
no-action alternative. Also on page 4-6 is a very important  
statement: "No significant adverse air-quality impacts  
related to the PM and HAP's emissions are expected as a  
result of the Southeast Bypass project."

Noise is another concern, especially with our high  
school so close. This is addressed well on page 4-14. The

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1 document is speaking to the insulation of buildings as a  
2 feasible remedy. This, quote, "This should be an effective  
3 way to mitigate interior noise levels for Issaquah High  
4 School. But assuming a 20-decibel reduction of the school  
5 walls, no interior noise above FHWA of 52 decibels would be  
6 expected. Therefore, there would no noise impacts to  
7 mitigate."

8 Also, if you review table 4-5, you will see that there  
9 are some increases in noise level for all of the build  
10 alternatives at some of the receptor points. The no-build  
11 alternative has increases at every single receptor point.

12 The hydraulic report. There are extensive studies  
13 conducted to obtain all relevant hydraulic -- and hydraulic  
14 information for the project area. Bore holes, test pits  
15 were drilled and dug for the project. Drilling logs for the  
16 wells, the water wells, in the vicinity were obtained and  
17 studied. Information on existing drainage systems and  
18 proposed drainage/storm drainage plans were obtained. These  
19 studies show that there were no concerns that could not be  
20 mitigated.

21 And I quote: "Based on this evaluation of expected  
22 infiltration pond performance, table 4-11, assumes that all  
23 of the Southeast Bypass roadway runoff north of the entrance  
24 to the South Park Trail parking lot would infiltrate the  
25 ground and engineered stormwater ponds in a typical year and

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1 would recharge our groundwater.

2 Another quote is: "The preferred Alternative Six  
3 would not result in filling the existing flood plain and  
4 would mitigate increased stormwater runoff by the  
5 construction of detention ponds."

6 There's an important traffic study table that I think  
7 we need to bring to everyone's attention this evening. This  
8 is a table that shows traffic counts. Now, quickly, Second  
9 and Issaquah-Hobart, 2000, no-build 1,060 cars on the a.m.  
10 And if we don't build it, in 2030, our traffic counts are  
11 2,365.

12 As I stated earlier, this is a very complete,  
13 comprehensive document that reviews all the concerns. And I  
14 ask that this document be approved and the project move  
15 forward quickly.

16 Thank you.  
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1. The City has received your letter and appreciates your input.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF CONNIE FLETCHER

Connie Fletcher. I'm a member of the school board.  
Just briefly, the school district has responsibility to protect the learning environments for the children in our community and also protect the school facilities, which are significant community assets for the Issaquah community and surrounding areas. Our staff is in the process of reviewing the EIS in detail and will provide written comments to the city council in the future.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF DENISE D. SMITH

Denise Smith, 231st Avenue Southeast, Issaquah.

Thank you for allowing me to submit comments to the Draft Supplemental EIS. This project has been a cloud in my life consciousness for almost 15 years.

As a member of the original Groundwater Advisory Committee for the Issaquah Creek Valley, I am acutely aware of the groundwater issues in the lower Issaquah valley. There are both positive and negative arguments that can be made about the bypass's effect on groundwater and the ability of talented engineers to mitigate any adverse effects. But to build or not to build is not my focus this evening.

I would like to speak to the adequacy of the SEIS from a water perspective. As the SEIS states on page 461, quote, "Despite extensive study of these aquifers" -- those are the multilevel system that make up the lower Issaquah valley aquifers -- "their behavior and interrelationship among -- and the interrelationship among them are not completely understood."

I believe that protecting our precious and finite Issaquah drinking-water supply for our families and our future is the primary responsibility of our city government and the citizens. That is why I'm concerned with the statements, as in the EIS, such as that on page 462 which

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1 says: "As of 1994, no volatile, organic contaminants has  
 2 been reported." 1994. That is taken from the Issaquah  
 3 Groundwater Advisory Committee study from 1996. This EIS  
 4 was done to protect our life blood -- our water supply. It  
 5 seems to me that data from 1996 could have been updated.

6 That is also why I become anxious by statements that  
 7 assume that the wet ponds infiltration facilities in general  
 8 would manage runoff, with the caveat, of course, that timely  
 9 cleanup is assumed. This is a concern since the number one  
 10 threat to the groundwater supply identified in the  
 11 groundwater study in 1996 was hazardous fills and  
 12 contamination.

13 Both areas where the wet ponds and infiltration are  
 14 planned are critical to groundwater. The northern site is  
 15 close to major production wells, and the southern end is  
 16 where the groundwater comes over the Issaquah gap at its  
 17 most shallow level.

18 These concerns may have been assumed by the designers,  
 19 but I believe we, as the consumers dependant on the quality  
 20 and safety of the water supply, deserve more assurance than  
 21 we got from this EIS.

22 Thank you.  
 23  
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1. Comments noted. Under Modified Alternative 5 the design of the proposed stormwater ponds does not assume that infiltration would be possible, except at North Pond 2. Analysis for this FEIS indicates that the proposed project would result in a 0.10 percent (1/1000) reduction in the total recharge volume in the Lower Issaquah Valley aquifer. If additional testing confirms the infiltration potential for stormwater ponds, they would be designed for the maximum infiltration rate possible. Under this scenario, no reduction in aquifer recharge would be expected because nearly all runoff from the proposed roadway would be infiltrated.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF JACK FROST

Jack Frost, 24211 Southeast 106th Place.

The EIS and the bypass I feel are short-sighted in its attempts that they attempt to solve a regional problem with a local solution. The EIS only contains minor and really fairly vague references to the regional factors and influences. And I hope our city won't be as short sighted.

The Southeast Bypass is essentially an unfettered arm of the freeway. And by next year, Highway 18 construction between Issaquah-Hobart Road and Maple Valley and Auburn will be complete. And that puts all the pieces in place except for a freeway through Issaquah-Hobart Road. And if DOT want it done, they'll get it done. And the EIS even makes reference to it, stating with regard to Issaquah-Hobart Road, that additional road -- I quote, "An additional roadway capacity to accommodate projected volumes."

Now, many people including members of the council and Councilman Irons today, have said that Issaquah-Hobart Road can't be widened due to environmental restrictions, including wetlands and Issaquah Creek. Boy, I'd like to think they're right; but I'm afraid they're not. One similar example in the recent Highway 18 construction from Maple Valley to Issaquah-Hobart Road, two waterways were

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1 rerouted, 49 acres of wetland were recreated to mitigate  
 2 damage, additional wetlands have been additionally filled,  
 3 and, yes, this is all part of the Cedar River watershed. So  
 4 don't think that, that Issaquah-Hobart Road is untouchable.

5 With the bypass, traffic volumes will actually  
 6 increase and our troubles just go on. Building capacity  
 7 only attracts demand. The EIS anticipates a moderate  
 8 increase in pass-through traffic due to the bypass at 4 to  
 9 9 percent. In 1990, DOT anticipated a moderate increase in  
 10 traffic when they expanded the Lake Washington floating  
 11 bridge to seven lanes. Within six months, vehicle trips  
 12 were up 63 percent. DOT was stunned.

13 If you build capacity, you create more demand. And  
 14 demand will quickly overrun the capacity of the bypass. I  
 15 thinks it's naive to think this won't happen. This region's  
 16 history tells us over and over again that it will. Look no  
 17 further than Covington, Maple Valley, Bothell, Marysville.  
 18 Look at 520 and Redmond-Fall City Road. It's a nightmare.  
 19 There are plenty of examples, but I can think of no  
 20 exceptions.

21 And it all started by trying to build our way out of  
 22 congestion. Don't repeat the mistakes of all these other  
 23 channels. If you do the same thing, you get the same  
 24 results.

25 Thank you.

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1. Your comments are noted and will be considered in the City's decision for this project.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF KRISTINE ADAIR

Hello. My name is Kristine Adair. I live at 276 Front Street South. I want to do something about traffic.

As a tax-paying citizen, I find myself alarmed, depressed, and indignant at this SDEIS. It has taken four years and far more money than anticipated to produce. With that amount of both time and money spent, I expected more. We, the general public, have had this four-year, multi-million-dollar document in our hands for less than a month. And many can see that the inadequacies in the study are glaring and numerous.

In nearly every instance, Alternative 7, referred to as the "no-action alternative," was ignored. I know that those supporting the no-build alternative were asked to produce suggestions for this alternative. In good faith, ideas were submitted. Some of those which were not addressed in the SDEIS were: Mitigate and improve Second Avenue; synchronize traffic lights; since this is, as stated, a regional traffic problem on route 18, increase transit service to the south; add another underpass over or under I-90.

It is stated, also, that there are no businesses displaced. This is not true. In our neighborhood alone, South Alignment A, there are two home-based businesses.

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1. Mitigation measures are considered for the No Action Alternative in the SDEIS. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but are not reasonable because they are not effective in reducing congestion.

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2. Comments noted. Home-based businesses were not identified in assessor's records used to determine land uses on affected parcels. Where businesses would be displaced by the proposed project, compensation would be provided in accordance with the Uniform Relocation Act regulations.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 Speaking for our business, The Gathering Landscape is not  
 2 only run out of our home; but our yard is a showcase for  
 3 Michael's rock work, planting style, and visual presentation  
 4 for our invited clients. We told you this during the last  
 5 comment period, yet it was ignored in the study. Please  
 6 correct this error.

7 The visual-quality section was inadequate. View sheds  
 8 do not fully address changes to the North Lewis lanes south  
 9 and Sixth Avenue which will be impacted both during  
 10 construction and after. Visual-quality ratings were vague.  
 11 The comparison pictures do not show comparisons of the same  
 12 views before and after the project. And why, when we have  
 13 the technology and the capabilities, did the document use  
 14 renderings or sketches rather than a computer-enhanced view  
 15 of these views after? Please do this for each view.

16 Cumulative impacts of both the Southeast Bypass and  
 17 Park Pointe projects overlap were glossed over and not  
 18 specifically addressed. Because the two are so closely  
 19 tied, they need to be presented.

20 Quality of life, people in our view shed neighborhood,  
 21 our homes are there because we wanted the space. We chose  
 22 them there because we wanted the space and land around them,  
 23 beautiful views with stands of trees, less noise, air  
 24 pollution than the more densely populated areas. People  
 25 looking for an old-neighborhood feel, our neighborhood

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3. The DSEIS visual analysis followed appropriate state and federal procedures and was reviewed and approved by the FHWA and WSDOT prior to issuance of the DSEIS. It has been acknowledged that visual quality ratings may be subjective and can differ depending on individual viewer sensitivities. Existing topography, vegetation, and distance from proposed improvements affected rating scores from viewshed locations. Computer-generated graphics were considered, however, subsequent decisions resulted in the use of different graphic representations in the visual analysis section of the SDEIS. Computer generated graphics were not approved in the final consultant contract. These graphics are consistent with acceptable approaches to representing potential view impacts. Computer-generated graphics were considered but were not included in the final approved contract with the consultant.

4. The Park Pointe development is not reliant on the SE Bypass for access. As noted in the SE Bypass SDEIS, the original development proposal under the Urban Village land use designation (described above) did rely on the SE Bypass to achieve the development density. However, under the current land use designation and zoning, the project would have 356 residential units, and the SE Bypass is not needed for the development. There are no other projects that are reliant or anticipatory of the SE Issaquah Bypass.

## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 enjoys a nice diversity: Ethnically, religiously, age,  
2 income. We put great value on these assets.

3 I'm going to skip ahead here. I request that you  
4 actually show studies that actually implement the  
5 suggestions which were requested and received for the  
6 no-action alternative. I feel that your treatment of this  
7 alternative is dismissive and unworthy of the finances  
8 already spent on this project. No one I know of who  
9 supports Alternative 7 are suggesting no action be taken.  
10 Simply be willing to look further and more holistically.

11 Thank you.

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5. Mitigation measures were considered for the No Action Alternative in the SDEIS. The No Action Alternative was defined as a decision not to build the proposed SE Bypass roadway, and no other actions were attached to that alternative. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but are not reasonable because they are not effective in reducing congestion.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF LISA BEHRINGER

I'm Lisa Behringer, and this is my husband, Adam Behringer. And he's going to hold up some exhibits. We live at 550 Southeast Lewis Street here in Issaquah. We're homeowners as well as business owners.

We're here to read directly out of the EIS, and so I'd like to quote from chapter 1 the "Purpose Statement." "The need for the proposed project is the result of existing traffic volumes on the city streets and the necessity to increase mobility by reducing congestion and improving access to I-90. The purpose of the proposed project is to resolve these problems by reducing traffic volumes that are causing the two existing interchanges and the Front Street corridor to be overburdened."

Let's see what the EIS has to say about this "Purpose Statement." The EIS does not demonstrate how they're going to solve this problem, when we look at chapter 2. The most congested areas are even made worse as the EIS states.

Next, I would like to describe the table on 2.6 from the EIS. This table shows the wait times at intersections at Front Street as they intersect with the westbound ramps, the eastbound ramps, Front Street at Gilman. We have also highlighted Issaquah-Hobart Road. This chart compares build against a no-build option. The areas that we have

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1. and 2. Comments noted. Traffic modeling for the proposed project does support the purpose and need as indicated in Chapter 1 of this FEIS. Traffic data indicate that Modified Alternative 5 would substantially improve operations for north-south travel conditions and accessibility to I-90 from Front Street and the proposed SE Bypass roadway.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 highlighted are the areas of the worst congestion and the  
2 areas mentioned in the purpose statement.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF ADAM BEHRINGER

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3 Because this chart, Table 2-6, directly from the  
4 Environmental Impact Statement, is a little confusing and  
5 hard to digest, we've created our own version of the  
6 exhibit. We have plenty of copies to distribute to anybody  
7 who wants one after we're done. This exhibit shows the same  
8 numbers as the table 2-6.

9 The first thing I want to point out is the mornings,  
10 on the eastbound and westbound ramps, are currently  
11 moderately heavy traffic but will -- according to the EIS,  
12 are made worse when you build the bypass.

13 The real problem is the evening on those two  
14 intersections. The westbound ramp shows a 57-second wait  
15 time currently as well as the eastbound ramp. The westbound  
16 ramp shows a 4-second improvement if you build the bypass.  
17 For anyone counting, that's \$10 million a second. The  
18 eastbound ramp -- let me check it 'cause I want to make sure  
19 I get it right. The eastbound ramp currently shows  
20 57-second wait time. If you build the bypass, that  
21 increases by almost 20 seconds to 75 seconds. That's in  
22 2005. If the bypass is built, it makes that intersection 20  
23 seconds worse. When you look at the numbers for 2030, it  
24 shows in every single case on both on-ramps, the bypass  
25 makes traffic worse.

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1 When you look at Front and Gilman, though, we finally  
2 see some improvement. In the mornings, if you don't build  
3 it, there's really long wait times. If you do build the  
4 bypass, it shows some slight improvement. And I'm not a  
5 traffic engineer, but I'm not quite sure how Front Street  
6 and Gilman is going to improve when both intersections are  
7 getting worse.

8 However, if you look at the real problem, which is  
9 Front Street and Gilman in the evening, where it's currently  
10 failing, does the bypass solve this problem? Not at all.  
11 You build the bypass, and it's still failing. These three  
12 areas are those areas specifically mentioned in the "Purpose  
13 Statement" on page 1 of the EIS.

14 But we also threw in Issaquah-Hobart Road because  
15 there's a lot of people commuting from the south to I-90  
16 through our town. And these people are stuck in traffic on  
17 Issaquah-Hobart Road. Are they going to be removed by the  
18 bypass? Not at all. It's still failing, morning to  
19 evening. And when you get to 2030, it gets worse; and the  
20 bypass aggravates this problem by adding more commuters and  
21 development that are going to use this road.

22 I would like to conclude by saying that the DEIS does  
23 not address the purpose that's on page 1. It does not show  
24 how it's going to improve traffic on Front Street near the  
25 highway interchanges and the on-ramps of I-90. In fact, it

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 shows that traffic is worse.

2 We want traffic fixed. We ask our council members to,  
3 as soon as possible, put this idea to rest. Let's start  
4 working on solutions that work.

5 Thank you.  
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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF ROWAN HINDS

My name is Rowan Hinds. I live at 1571 Sycamore Drive here in Issaquah.

We've heard earlier. They say build it, and they will come. That's partly the case because we've built precious little to date and they've come anyway. Under our Declaration of Independence, we have the right to life, liberty, and the pursuit of happiness. Today, unfortunately, we also often pursue our happiness from within the automobile.

Since we first started discussions about the Southeast Bypass some eight years ago, we have completed the Exit 18 on I-90, which is the northern terminus of the bypass. An issue that's not been discussed to this point is the large number of new vehicles that are being added to our transportation system. If you look at the SEIS, it would be helpful if we had some current information concerning the traffic counts within the city since completion of the interchange and the SPAR.

Otherwise, I think we know the issues. We know the impacts. After tonight, we know them even better. And we know the mitigation of those impacts. Engineering and design is the time and place to answer questions, many of the questions now being raised.

Concerning the number of new vehicles, regardless of

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1. Traffic modeling for the year of opening and future operations in 2030 does account for the Sunset Interchange and potential changes in traffic patterns in the future. Existing traffic data serves to provide a framework for the current traffic conditions only.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 how we feel about the bypass, we all love our cars. Within  
2 the greater Issaquah community, there are approximately 3600  
3 new cars bought every year for some 28,000 new cars since we  
4 began discussing the need for new road capacity in 1996.  
5 With an average cost of 20,000 per car, we've invested over  
6 a half billion dollars to pursue happiness around and within  
7 Issaquah. By the time horizon of 2030 for the SEIS, if we  
8 continue this trend, the Issaquah community will buy an  
9 additional 93,000 cars at a cost of over 1.8 billion current  
10 dollars. Of course, none of this includes the thousands of  
11 people from Maple Valley, Covington, Puyallup and points  
12 south who use Hobart Road everyday.

13 No wonder there is and will continue to be traffic  
14 congestion on Front Street, Gilman Boulevard, and everywhere  
15 else downtown. We've met the enemy, and it is us. From  
16 personal knowledge, I can say that as far back as 1989, at  
17 7:00 o'clock in the morning, 7:00 to 8:00 a.m. peak, I  
18 guess, an average of 65 percent of the traffic eastbound on  
19 SR 18 -- this is 15 years ago -- turned onto Hobart Road.  
20 They were not going to Hobart. So it's nothing new.

21 Is the Draft SEIS perfect? No. Is it adequate? Yes.  
22 Give us back our freedom. Give us back our downtown. Let  
23 us move forward, both literally and figuratively, on this  
24 important component of our road system. One of my regrets  
25 is we did not build a bypass as part of the Exit 18 project.

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## STATEMENT OF JANET WALL

I'm Janet Wall. I live at 22740 Southeast 56th Street, Issaquah, 98029. I'm a member of the Rivers and Streams Board of Issaquah. I'm speaking tonight as an individual concerned citizen.

I have many concerns about the proposed Southeast Bypass, but I will confine my comments tonight primarily to the inadequacies of the SEIS in addressing water issues at the north end of the proposed bypass, where all six build alternatives have the same alignments and where the proposal is to cut into the side of Tiger Mountain across our critical aquifer recharge area and put up huge retaining walls.

Phase I of the highway construction would do almost as much damage as Phase II in this area because all of the clearing and grading and the erection of the retaining walls will be done in preparation for the four-lane highway. And that will be seven lanes at the north end. Little mention has been made on the SEIS about dealing with probable interceptions with groundwater in the process of making this huge cut nor about the importance of ensuring adequate drainage from behind the retaining walls so that water pressure from the intercepted groundwater doesn't jeopardize the integrity of the retaining walls that will hover like

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1. Subsurface soil and groundwater conditions change considerably over relatively short vertical and horizontal distances. These conditions will require additional subsurface testing at the design level of the proposed project. It is acknowledged that naturally-occurring groundwater may be encountered in discontinuous water-bearing zones within the potential cut area. These water-bearing zones will be affected to the extent that they will drain to the base of the proposed retaining walls and will be allowed to re-infiltrate into native soils below the level of the walls. A design-level subsurface exploration program can be developed that would adequately address the geotechnical and hydrogeological considerations at the north end of the proposed SE Bypass project as a basis for structural wall design.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 dams above the center of town.

2 If I could emphasize one sentence: Never  
3 underestimate the power of water or overestimate the ability  
4 of present-day experts to predict what water is going to do.  
5 We simply don't have the technology yet to know what pathway  
6 water will take. As it percolates through complex glacial  
7 deposits, it often surprises us.

8 I'm afraid Issaquah has had a poor track record on  
9 such projects. Time and time again, we've been assured that  
10 no damage will occur. Time and time again, water has  
11 overwhelmed the stormwater conveyances or gone another way.  
12 Landslides have repeatedly occurred, and large quantities of  
13 sediment have entered our salmon streams.

14 Another issue is the infiltration of runoff. The SEIS  
15 stresses the importance of checking the ability of the  
16 proposed infiltration ponds to infiltrate prior to selecting  
17 the preferred alternative. Yet all the alternatives in the  
18 north have the same pond location, and no alternate  
19 locations are proposed if one or more of the sites are  
20 unable to infiltrate at the expected rate.

21 But I can repeat: Engineers tend to be optimists.  
22 But never underestimate the power of water.  
23  
24  
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2

2. Comments noted. As indicated above, subsurface conditions vary greatly in the project area. Therefore, it is not appropriate to simplify geologic conditions at the north end of the proposed SE Bypass project area to conditions encountered at the Sunset Interchange or Issaquah Highlands, or other nearby areas. With mitigation, the proposed project is not expected to result in adverse impacts on groundwater or stormwater runoff in the project area.

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3. Since issuance of the SDEIS, the proposed project and Modified Alternative 5 has been selected for the preferred alternative. Under this alternative, infiltration is no longer assumed for all of the water quality ponds, except for North Pond 2 and ponds would be designed for detention and release of stormwater. The possibility of infiltration will be evaluated again during the project design phase, and incorporated into pond design if achievable.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF LARRY FRANKS

My name is Larry Franks. For the last 32 years, I've resided at 24001 Southeast 103rd Street, just off of the Hobart Road south of town.

And I'd like to take us down the hypothetical highway that we're proposing be built as the Southeast Bypass. Let's suppose for a moment that the city council accepts the EIS in its current form with its stale data, with its difficulties in addressing a number of the issues at hand. That takes us to 2005. Then we move on to finance. We do not have secured funds for this. If you've dealt with computer programmers, you're familiar with this box in the flow chart labeled "miracle happens here." So the miracle happens. It's financed. We're at 2006. We start to build. Building would take roughly two years, which takes us to 2008: Intolerable conflict while the construction goes on.

Let's say we operated to the 2030 extent of the traffic estimates that have been made that demonstrate that by that time, it will have been completely overrun. There will be no benefits in terms of the length of time that it has been in place.

Councilman Irons has pointed out that there will be no mitigation further down the road. So that traffic that does get moved through Issaquah for some period of time will then

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1 gang up at Hobart Road where we go from, call it six lanes  
2 to two lanes.

3 What should we be doing instead? We should be putting  
4 the same amount of energy into a long-term solution, a  
5 three-county solution that gives us something competitive  
6 with the transportation system in Washington, D.C. Give me  
7 a Metro or BART in San Francisco. Pursue the low-cost  
8 options now to relieve some of the congestion that we can:  
9 Synchronizing lights. But put this energy into that  
10 long-term plan that will really give us a chance to address  
11 this regional problem.

12 Thank you.  
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1. Your comments have been noted and will be considered in the City's decision for this project.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF JIM BRADY

My name is Jim Brady, and I live at 530 Southeast Bush Street in Issaquah. I've lived here 37 years.

I find the Supplemental Draft Environmental Impact Statement inadequate compared to some other opinions. I think it's biased. Furthermore, I have no trouble getting around Issaquah any time of the day and offer those who seem to be struck in traffic a free ride around to show how it is done.

A couple -- there are several items, one relating to the bias. On page 4106 of the "Wildlife Mitigation," it is stated that the City of Issaquah has a tree-replacement policy that requires replanting the same number of trees that are cleared so that wildlife habitat is replaced. Now, I think there is a difference between a 1-foot high tree and a 100-foot high tree. That statement should be clarified so a reader would understand that a time element may be involved in replacing the large trees.

Another thing that's kind of blown up is the earthquake hazard, the landslide hazard. According to the DEIS, the inferred location of the Seattle Fault is 4.8 kilometers north of the project area. A 4- to 6-kilometer fault zone north and south of the Seattle fault has recently been mapped, that can be project through the project area. A

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1. Your comments have been noted and will be considered for the FEIS. Landscaping is intended to provide visual screening at the time of planting and as plants matures. It has been acknowledged that plantings would take time to mature.

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1 magnitude 7 earthquake associated with the Seattle fault  
 2 occurred 1,100 years ago. The SDEIS also points out that  
 3 the recurrence interval for earthquakes of a magnitude of  
 4 6.5 is 35 years and a magnitude of 7.5 is 110 years. I'm  
 5 getting up there.

6 With numbers like these, the final EIS should address  
 7 the probability of earthquakes and the extent of damage  
 8 resulting from the construction of this project.

9 Another thing, the visual-quality section needs more  
 10 work. It consists of only eight photographs, one from the  
 11 project location itself looking out, and four renderings by  
 12 someone of how that person thought the completed project  
 13 might look.

14 The measures proposed to mitigate the visual effects of  
 15 this project, which incidentally are the same for all  
 16 alternatives, are unclear. What is meant by the statement  
 17 that "The project will be designed to reduce visual  
 18 intrusion as much as possible"? What color will the walls  
 19 be painted to, quote, "blend with existing vegetation and  
 20 topography?" Some say Sunset Interchange orange comes to  
 21 mind. And how large will the vegetative plantings be to  
 22 screen the roadway and others structures? Some of the trees  
 23 on the hillside now are well over 100-feet tall.

24 The appearance of a community defines its quality. The  
 25 SDEIS must describe how the bypass project fits in with the

2

2. Comments noted. The SDEIS does indicate that portions of the proposed project route would occur within the seismic hazard critical area along the south end of the alignment. Seismic hazards that exist in this area are not particularly different from other seismic hazard areas within Issaquah that have been developed with urban uses. Design of the roadway across the seismic hazard area would include standard design and construction methods in accordance with accepted engineering standards for this type of construction. Additionally, other structures such as retaining walls in the northern project area, which is not characterized as a seismic hazard area, would be designed and constructed using accepted engineering standards that include seismic loading during earthquake events.

3

3. The DSEIS visual analysis followed appropriate state and federal procedures and was reviewed and approved by the FHWA and WSDOT prior to issuance of the DSEIS. Figures provided in the visual quality analysis are intended to provide representative views in the project area. Wall colors, vegetative plantings, and other visual quality mitigation would be chosen in consideration of the existing setting and is expected to reduce visual impacts associated with the proposed roadway.

4

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1 long-range objectives of the city and how the mitigation  
2 efforts recommended relate to those objectives. Let's look  
3 ahead 50 or 100 years.

4 Thank you.

4

4. Your comments are noted and will be considered in the City's decision for the project.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF MARK BUCHLI

Mark Buchli. I live at 125 Mount Pilchuck Avenue Northwest. I've been living in Issaquah since 2000; and living on the shoulder of Squak Mountain have been subject to the brunt of development of the Taylor project and the widening of State Route 900.

There are a couple of issues that come to mind when I think of what we're proposing to do on the other side of Issaquah that weren't addressed in the Environmental Impact Statement. The first, I think it would be real helpful for people to see what has happened to the background or ambient noise levels in this community and have monitoring stations clearly show where their position and the technical data surrounding those.

I'd also like to see something done with the air quality. As one of the other people pointed out, we're not even addressing the issues of ozone level, mox levels, and particulates. And come on, people, you know that when we speed up our automobiles, we're generating a lot more of all three of those.

Another issue is groundwater recharge. And being a geological engineer, I learned very quickly that our quick engineering fixes are nothing to match Mother Nature. She knows how to put the water in the ground. And if we think

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1. The DSEIS identifies all locations where noise monitoring occurred, along with existing noise levels at these locations. Projected noise levels for Modified Alternative 5 are provided in Chapter 3 of this FEIS.

2

2. Air quality impacts were modeled in the DSEIS and existing and projected standards under Modified Alternative 5 are provided in Chapter 3 of this FEIS. Air quality modeling has been conducted in accordance with WSDOT standards and indicates that the proposed project would not result in exceedances of state and federal standards for air quality.

3

3. Comments noted. Potential impacts on groundwater from the proposed project have been evaluated and the proposed project is expected to have a minor impact on groundwater recharge. A 0.10 percent (1/1000) reduction of the total Lower Issaquah Valley aquifer would result from the proposed project. If additional testing confirms infiltration potential for stormwater ponds, no reduction in aquifer recharge would be expected because nearly all runoff from the proposed roadway would be infiltrated.

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1 that our little detention ponds are going to fit the bill  
2 and it doesn't happen.

3

3 The other issue people should think about is we're now  
4 at the point of first chlorinating water from Issaquah water  
5 shed which has never had to happen before.

6 And the last issue is that there's a basic equation, I  
7 think, that all of us have seen that have lived around the  
8 country, the United States; and that is, if we put in more  
9 roads, there's more development that follows. And that  
10 inherently reduces the quality of life for the people that  
11 reside there. And it seems to me that we, as commuters, are  
12 like water. We'll always follow the path of least  
13 resistance. And if you build a bypass, that's what you're  
14 asking for.

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4. Your comments have been noted and will be considered in the City's  
decision for this project.

15 Thank you very much.  
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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF ERIC ERICKSON

I'm Eric Erickson, 13040 189th Southeast, Renton. I grew up, of course, on Issaquah-Hobart Road on what is now Front Street South. My grandfather came here. He built his house at the end of the one-lane Widen Road, which was in -- now 238th Way, south of the city limits.

Of course, that was before the first automobile came to Issaquah. It came in 1911. But a couple years later Henry Ford brought a lot of cars here, and we had to build a new Issaquah-Hobart Road. And that new Issaquah-Hobart Road went along Second Avenue Southeast over here and wandered around off and on to Lewis Lane up to 238th Way.

1928, of course, we had to do a little more road work. We built the Nachez highway through Issaquah. We extended the new Issaquah-Hobart Road from where the Clark Street Bridge is now south to Hobart, two lanes, by the way. Now that was 1928. The Issaquah-Hobart Road is still two lanes since 1928.

We now have six lanes right now feeding the two lanes. We have two lanes of Newport Way, two lanes of Front Street South, two lanes of Second Avenue Southeast already feeding a two-lane road. The bypass will add anywhere from two to four more lanes to feed a two-lane road that is already overloaded.

1

1. The proposed project is intended to address existing traffic congestion on the Front Street corridor. Impacts south of the city are addressed in the cumulative impacts analysis. Traffic modeling for the project did consider additional demand for the proposed facility.

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Now, on the EIS, of course, it doesn't cover any of the impacts outside of the city limits. So anything that happens on the Issaquah-Hobart Road through increased traffic is not covered in the documents. And if you build more roads, there will be more people trying to get out there.

There are a number of other items. They recommended Alignment 6. It fails to mention the former railroad trestle and the fill site that extended from the back of the high school football stadium around to Second Avenue, but which has unknown fill materials in it in addition to some remnants of the railroad trestle itself, probably a vertical piling. There is maybe some fill material that needs to be moved out of the way or done something else with it as well as some construction problems.

It also fails to mention the springs and the high water level that was encountered on the end of East Sunset east of the start of the bypass route. Several years ago, they constructed a power cable, telephone cables, up the hillside there and ran into substantial amounts of water level. They even had to hold off on their construction 'cause they couldn't get through the water level -- not mentioned in the bypass at all. And it will be affecting that whole area.

Not to mention the two state detention ponds that

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2

2. After issuance of the SDEIS, modifications were made to Alternative 5 which is now called Alternative Modified 5. This alternative is now the preferred alternative because it is the only build alternative that is considered effective in reducing traffic congestion and has impacts that can be effectively mitigated. The other alternatives considered in the SDEIS are not reasonable because they are not effective in reducing congestion.

3

3. Comments noted. Subsurface conditions vary greatly in the project area and it is not possible to compare other areas with conditions along the SE Bypass project route. Additional subsurface exploration would be done at the design level for retaining walls in the project area and the project would be designed with appropriate standards for conditions in the area.

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1 don't infiltrate water on the north side of Sunset. And  
 2 proposing another one on the south side, which will have  
 3 groundwater level higher than the bottom of the pond at all  
 4 times of the year or most all times of the year, that will  
 5 make three mosquito ponds for us instead of the two that now  
 6 are off the Sunset Interchange.

7 It also fails in the case of Section 4-F. It  
 8 recommends a number of mitigation efforts for historic  
 9 values. It says one of them is that we should conduct  
 10 interviews of all the members of the Sportsman's Club. We  
 11 already have a nice 250-page history of the Sportsman's Club  
 12 in place. It also mentions that we should do something with  
 13 the lumber mills that were on the south end of town on the  
 14 Sixth Avenue alignment. The Donlan Mill, that's already in  
 15 place and published, complete.

16 And it also mentions a number of other suggested  
 17 mitigation efforts such like walking-tour brochures, which  
 18 are already in place, historic tours, and interpretative  
 19 signs which we just recently had placed about 20 of those in  
 20 the city covering our history.

21 And last but not least, the two items, the noise and  
 22 the air-pollution issues, air pollution, we're just moving  
 23 the problem from downtown Issaquah to the residential zones.  
 24 And the noise issue, particularly from trucks, even though  
 25 King County is going to keep the garbage trucks off, that

4

4. Since issuance of the DSEIS pond design for Modified Alternative 5 was reviewed and infiltration is no longer assumed for North Pond 1 near East Sunset Way.

5

5. The Issaquah Sportsmen Club clubhouse is on the National Register of Historic Places. This property would be avoided and will retain a wooded buffer of 75-100 feet. No other historic properties are affected by the project under Modified Alternative 5 and therefore no mitigation measures are necessary.

6

6. Comments noted. Air and noise impacts for Modified Alternative 5 are addressed in Chapter 3 of this FEIS. The proposed project is not expected to result in adverse impacts on air quality or noise in the project area.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 doesn't keep Cedar Hills Composting from running their  
2 compost trucks down here nor the gravel trucks to return  
3 because the gravel pits in Issaquah are out of gravel and  
4 they'll have to bring gravel in for grading from someplace.  
5 And you bet that will come from Issaquah-Hobart, that area.

6 Thank you very much.

6

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF AL SAYMA

My name is Al Sayma. I live on Squak Mountain in Issaquah.

I'm here to say that I believe the EIS is seriously flawed. I think whether you're against the bypass or you're for the bypass, we can all agree on one thing: That that document for \$4 million was a waste of our money. We'd like our money back if you don't mind.

And you know that when you build that bypass or if you build that bypass, it won't be \$50 million. It will be way more than that. Because if this document costs that much money, our roads will cost way more than that. So I hope that we take that into consideration, the city council takes that into consideration.

Let me just say something specific, which is what you want to hear: Although the DEIS lists hazardous chemicals, why are there not air pollutants evaluated such as benzene, nitrogen dioxide, which is a byproduct of fossil fuel combustion from motor vehicles? Since these pollutants contribute to ground-level ozone and benzene emissions in the Puget Sound area are higher than the national average, why was there not an evaluation or model of those pollutants? For the health of the citizens of Issaquah, don't we want the most accurate air-quality evaluation?

1

1. The analysis follows WSDOT policy and guidelines relating to National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA). The complete Environmental Procedures Manual can be found at the following website:

<http://www.wsdot.wa.gov/fasc/EngineeringPublications/Manuals/EPM/EPM.htm>

The project would meet the conformity criteria described in the Environmental Protection Agency's (EPA) Conformity Rule (Code of Federal Regulations, Title 40, Part 93).

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 DEIS gives no data.

2 Or greenhouse gases, primarily carbon dioxide, why is  
3 there not an evaluation of carbon dioxide emissions in the  
4 EIS? They are primary contributors to greenhouse gases as  
5 well as nitrogen dioxide and methane.

6 Sport utility vehicles and light trucks emit about  
7 50 percent more carbon dioxide per mile, because they are  
8 less efficient. And there are still people today buying  
9 SUV's. So we know it's going to get worse.

10 I say when they give us that money back, we give it to  
11 the school board to give the teachers [inaudible.] I hope  
12 the school board, when they come up with their opinion, take  
13 a look at the noise level and how that affects learning.

14 If you go onto Google you will see that there are many  
15 studies that have been done on the relationship between  
16 noise levels and learning. And you can go on and find out  
17 the relationship between air pollution and asthma and other  
18 things like that. I say to the school board that they take  
19 a close look at those issues, too.

20 I think we're making a serious mistake if we build  
21 this bypass. I'm asking that we not build it. Someone  
22 mentioned that Park Pointe will build their development.  
23 Well the fact is, that Canadian holding company that owns  
24 Park Pointe has not built it yet because they're waiting for  
25 this council to make the decision. They're hoping so much

1

2

2. Potential impacts on schools under Modified Alternative 5 are addressed in Chapter 3 of this FEIS. The City has met with the Issaquah School District and has agreed to consider School District concerns in the design of the proposed project.

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1 that we make the decision tonight to build that bypass  
2 'cause they would have really easy access and that's what  
3 they want. If they don't have easy access, it makes it very  
4 difficult for those developers and more money.

5 Thank you very much.  
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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF STEVEN DREW

Good evening. First, I'd like to express some concern as a board member and officer of the Issaquah Trails Club regarding the trails mitigation. The EIS and the design, as it's discussed, proposes replacing a trail corridor through a wooded area with a sidewalk. That's not mitigation. Mitigation, at a minimum, would be a separated trail corridor, in the examples of that in town, the precedent of that in town. And to replace the trail that's there now with a sidewalk would be a sham.

Secondly, access to that trail corridor and to the DNR conservation area is going to be cut off by the bypass unless there are at least two overcrossings or undercrossings constructed to mitigate the interruption.

Now, speaking as a citizen, I'm concerned about so many things, there just isn't enough time. The EIS, I don't believe, adequately indicates an intent or an obligation to mitigate the effects on runoff and flooding, the effects on groundwater, noise, open space impact. All of these are going to suffer in the end unmitigated impacts.

But more importantly, the traffic model data is outdated. It's outdated because the interchange was not constructed. It's outdated because the school traffic -- I'm sorry -- because school parking is pulled from Second

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1. Pedestrian and bicycle facilities for the proposed project are intended to allow non-motorized travel to continue in the project area. The proposed sidewalk and trail facilities would maintain connections to more natural trails such as those of the Tiger Mountain NRCA.

2

2. Potential impacts and mitigation measures for these elements are addressed in Chapter 3 of this FEIS. Many of these issues were addressed during the City's meeting with state and federal resource agencies during the 404 Merger Agreement review in 2005. The City's Concurrence Point 3 Packet, provided to resource agencies during these meetings, also addresses many of these same issues.

3

3. Future year traffic modeling did account for the opening and operation of the I-90 Sunset Interchange and potential traffic patterns. Existing conditions were those in place at the time of modeling and did not attempt to anticipate possible improvements that could be made to 2nd Avenue, or other locations, at an unspecified time in the future.

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1 Avenue and the building of parking lots. As of the next  
 2 school year, there will be no school parking on Second  
 3 Avenue.

4 It's outdated because the school district has begun  
 5 using, effective beginning of the new school year, a second  
 6 bus barn up on the plateau that will reduce bus traffic at  
 7 rush hour. It's outdated because pending school district  
 8 improvements to Second Avenue will dramatically increase  
 9 safety and capacity on that road.

10 All of this modeling measures conditions that existed  
 11 five years ago and pits suppositions of what the bypass will  
 12 do against the supposition that nothing will have a zero  
 13 benefit. Well, in fact, our existing conditions  
 14 dramatically improved the baseline. And so that the EIS is  
 15 dramatically outdated and incorrect in numerous regards.  
 16 David Irons, in his letter in the newspaper, was wrong  
 17 because he's cited that same incorrect data.

18 More importantly than that, though, is that the EIS  
 19 fails to honestly study Second Avenue and Sunset Way as a  
 20 viable alternative route. There's no legal basis for that.  
 21 It's a glaring and obvious shortcoming. There are many  
 22 organizations that are discussing whether to contest that  
 23 deficiency in the process. It would be much better if the  
 24 city, if the agencies involved and the consultant involved  
 25 saved everybody a whole bunch of time and corrected this

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4

4. Alternatives to the proposed project were considered during early planning stages for the roadway. The SDEIS identified several alternatives considered and rejected during this process. This information is summarized in Chapter 2 of this FEIS. Newport Way was considered and rejected during 404 Merger Agreement meetings in 1999. Second Avenue has not been proposed as an alternative to the SE Bypass roadway. The City's Comprehensive Plan identifies 2nd Avenue as a collector arterial, not intended for regional mobility. Any improvements to 2nd Avenue to upgrade its functional classification would require separate environmental review. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but are not reasonable because they are not effective in reducing congestion.

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SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 dramatic flaw in the EIS.

2 This is an obvious alternative. To say that it is not  
3 a viable alternative because it's not a new roadway is  
4 hogwash. There are many alternatives in the bypass that  
5 were looked at that were improvements to existing roadways.

6 So I urge the agencies, the consultants, and the city,  
7 our elected officials to immediately improve this study.  
8 Now that we've wasted \$4 million, let's get something for  
9 it. Let's look at the existing roadways of Second Avenue  
10 and Sunset Way between Second and the interchange. And  
11 let's look at it honestly. Let's put some credibility, some  
12 ounce of credibility back in this process. For a dime to  
13 the dollars that have been spent, we can look at the  
14 existing right of way and how to make it safer and how to  
15 make it function with hardly increasing environmental  
16 impacts and save us, what, 38, 48 million dollars in the  
17 process.

18 Thank you.  
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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF DONALD E. SHELTON

My name is Donald Shelton. I'm a certified public accountant. I've been in public practice for 30 years, and I have a Master's degree in tax law. I live at 23581 Southeast 98th Place. I have lived there for 12 years, and the traffic has never been better in the city of Issaquah.

I have one real concern about all this; and when I look at this -- I've done a lot of financial forecasts in my life. I do know that when you get so many assumptions built into a document, often it is just a projection of your assumptions. It bears very little on what reality is. I think that's where we're at.

We have a very complex situation here. And no matter how much we study it, a document is never going to be truth. It's just not going to get us there. I think we have to look around us and look at our values and see what it is we want.

I'd like to ask what that miracle box is going to cost the taxpayers of Issaquah. How much money are they going to have to pay every year in taxes to fund the bypass that basically is going to have them waiting to get off I-90 the same amount of time? Or even if it's two or three seconds a little faster, who cares? How much money am I going to have to pay?

1

1. Funding for the proposed project has not been determined. It is likely that a combination of federal, state and local funds will be sought to construct the roadway.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 And who am I paying it for? I can look up at that  
 2 highway, and I can see those big trucks going by. I can see  
 3 those 50-foot retaining walls. And, you know, maybe one's  
 4 going to fall down on me. They did already, right? We've  
 5 got a problem out there. What are we doing?

6 Let's look around us. What's our reality? What do we  
 7 want? Do we want those mountains with those green trees on  
 8 them? Or do we want 50-foot retaining walls? You know, is  
 9 traffic okay? Yeah, you know. I live south of town. I  
 10 live all the way south of town, and I have to get on I-90.  
 11 Is it a problem? No.

12 What causes a problem for me? Buses, those school  
 13 buses is a problem. Gilman Boulevard is a problem. The  
 14 intersection at Sunset and Second is a little bit of a  
 15 problem. How much money is it going to cost to fix those?  
 16 I think a lot less than a bypass. Am I willing to pay for  
 17 that? I'm willing to pay for results.

18 What's going to bring results of traffic? You know,  
 19 small things that are going to give us improvements. Do  
 20 that first. Get results for your taxpayers. Don't saddle  
 21 us with tax bills for people living in Covington. Why  
 22 should we pay for regional solutions? It's a regional  
 23 problem. It should be solved regionally.

24 Fix Highway 18. Our ex-mayor said 65 percent of the  
 25 traffic on Highway 18 comes on Issaquah-Hobart Road. Fix it

2

2. Your comments are noted. The purpose of the project is to improve access to I-90 and reduce congestion along the Front Street corridor. As such it is intended to address concerns within the city and provide improved mobility for vehicle trips that do not require stops in the downtown business district.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 so it's a freeway so that traffic goes out to I-90. My  
2 wife tested that. It's faster today. If it's faster,  
3 people will use it. Improve it.

4 I think we have to get back to reality. Thank you  
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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF DONNA SHIREY

Good evening. First of all, I want to thank you for this process. It's really great to hear all the difference of opinions, and it's wonderful that we can all speak our minds.

I feel we must plan for the future. Some say, if you build a road, they will come. Well, guess what? Even if you don't build a road, they will come. And I want you to remember this: Growth happens when the kids leave home. I'd like to think of the road as the connector where we're connecting the north and the south of Issaquah, rather than a bypass.

Let's make good use of the money that we've spent through today and complete the process. Construction costs continue to rise every single year. It's important for us to move forward now. Our city council has permission to guide our future. Encourage building the Southeast Bypass. It's an important part of our regional traffic plan. And believe it or not, we are a part of this region. Build the bypass.

Thank you.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF RILEY SHIREY

Riley Shirey, 230 Northeast Juniper, Issaquah.  
I'm here to support the connector. Thank you.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF MARILYN ROMATKA

Good evening. I'm Marilyn Romatka, from 5527 166th Place. And I'm part of the Issaquah School District.

What we have in Issaquah is the envy of many, many cities, large and small: Access to trails and a beautiful natural area. This is a precious treasure: Space for exercising, strolling, getting away from noise and traffic, and our respective lifestyles.

My family and I use the high school trail often. We see joggers; dogs walking, walking their people; older folks keeping fit; younger families teaching good life habits of the physically active lifestyle. The high school trail and the railroad grade are unique; and Tiger Mountain being flat, they offer the mountain to all people, not just those who are athletic. Now they want to black-top that trail, and I'm very concerned.

How much of this treasure will we lose piece by piece? Please think carefully. We're talking about removing something that cannot be returned at a later date when we have our priorities straightened out.

I notice those traffic challenges. I drive there, too. I would not exchange my convenience for a piece of this mountain to be covered. These trails are, it seems to me, undervalued by many. The trails cannot be replaced by a

1. Your comments have been noted and will be considered in the City's decision for this project.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 sidewalk next to traffic. What we have here is a very  
2 limited resource that once taken is gone for good. The  
3 study should have considered the hiker's attitude about  
4 sidewalks versus trails. As one of the hikers using this  
5 trail, I can tell you this plan is no alternative. As a  
6 parent, I am concerned about the natural areas that we have  
7 entrusted to us but belonging to our children.

8 Please make the right decision, not for profit nor  
9 convenience but for Issaquah's future kids. Don't take the  
10 trail away from them.

11 Thank you.  
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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF BEN ROMATKA

Hi, my name is Benjamin Romatka. I'm in the Issaquah School District. If you cover up that trail, you're covering the most beautiful part of the mountain. I don't want to walk next to four lanes of traffic.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF JOHN MACDUFF

Hello. I'm John MacDuff. I live at 620 Southeast Bush Street, here in Issaquah.

There are a couple of things I noticed in looking at the document we're talking about today. The section on geology, it fails to consider the areas where the road would expose groundwater due to the cuttings of the hill. And that would lead to problems like the Camp Creek blowout or like, as mentioned before, the Elk Creek tunnel which is in the same general area. The water's right there, and it wasn't addressed at all.

In the fisheries and threatened species section, it states that the bypass is likely to adversely affect Chinook salmon critical habitat. The impacts that they listed didn't include the failure, that we already know about, of the existing Sunset Interchange holding ponds and the untreated flow into East Issaquah Creek.

Under land use, they didn't really make it clear that the only alternative that does not require exemptions to the current city codes is the no build. Also, land use didn't include anything about the bypass adding pressure for new development just south of Issaquah, which would just add more traffic to the whole system.

The other thing that bothered me is that the no-build

1. Subsurface soil and groundwater conditions change significantly over relatively short vertical and horizontal distances in the project vicinity and it is not possible to compare conditions elsewhere with the proposed project area. Additional subsurface exploration would be done at the design level stage to determine the design of structural walls in the north project area.

2. Since issuance of the SDEIS, Alternative 5/Modified Alternative 5 has been selected as the preferred alternative and this Final EIS contains new analysis for that alternative. Impacts to fish and wildlife are described in Chapter 3 of this Final EIS and within the Biological Assessment prepared for Alternative 5/Modified Alternative 5 and issued as a companion document to this Final EIS.

3. No potential code exemptions have been identified at this point. The Park Pointe development is not reliant on the SE Bypass for access. As noted in the SE Bypass SDEIS, the original development proposal under the Urban Village land use designation did rely on the SE Bypass to achieve the development density. However, under the current land use designation and current zoning, the SE Bypass is not needed for the development. There are no other projects that are reliant or anticipatory of the SE Issaquah Bypass. As discussed in the CP3 document, FHWA found that the SE Bypass project will mostly serve existing travel patterns and is unlikely to have any regional impacts and will, thus, result in minimal induced demand due to changes in trip activity and land use relocations. Land use differences between build and no build are minor, the difference being assumptions only for the Park Pointe development.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 alternative was the only one which is presented with no  
 2 mitigations considered at all. Although I assume that that  
 3 probably is legal to do it that way, it sure is highly  
 4 unrealistic. It would be far better off to be able to  
 5 compare apples and apples rather than what we've got there.

6 Under the traffic -- and this has been mentioned  
 7 before -- all the alternatives, if you look at the -- all  
 8 the alternatives fail solving the traffic problems through  
 9 the downtown between Gilman and Sunset Way. This is a  
 10 slight improvement with some of the build options in the  
 11 a.m. sections; but in the p.m., all of the alternatives,  
 12 every one of them, shows unacceptable levels of congestion.  
 13 That's on day one when it first starts.

14 These and the other problems that have been noted here  
 15 this evening should convince anyone that the whole project  
 16 is fatally flawed and should not be continued. It's time to  
 17 start spending what dollars we have on projects that will  
 18 make a difference to the citizens, like the third crossing  
 19 I-90, widening Newport Way, synchronizing traffic lights.

20 Thank you.  
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4. in the EIS process the No-Action alternative is intended to represent conditions in the absence of the build alternatives, to allow comparison of the build alternatives against a baseline. The No-Action alternative is not intended to identify or evaluate other options that could address the project's purpose and need. The process of identifying options began in 1996 and followed a long process that lead to the Final EIS. See Chapter 2 for a summary of alternatives considered and rejected.

5

5. Comments noted. Traffic data for the proposed project indicate that Modified Alternative 5 would substantially improve operations for north-south travel conditions and accessibility to I-90 from Front Street and the proposed SE Bypass roadway.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF SALLY A. LOW

My name is Sally Low, and I'd like to say that I live in beautiful downtown Issaquah and have since 1986. I live at 565 Southeast Croston Lane.

I am here to speak for those who have no voice in this matter: For the fish, for the birds who live in the area that we would destroy, for the bear, the deer, the racoon, and all of the animals that we are responsible for that we should be caring for. And we should not be destroying their land. We should be sharing their land.

Thank you.

1

1. The City has received your comments and appreciates your input.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF KATHLEEN DREW

Kathleen Drew, 1434 Sycamore Drive Southeast. I've been an Issaquah area resident for 18 years.

I had a terrible commute tonight. Over an hour it took me to get home from Bothell. Three minutes of it I spent in Issaquah. And the only reason I spent three minutes in Issaquah is 'cause I obeyed the speed limit, not because there was traffic.

I have commuted for the past eight years to Seattle and into Bothell on a daily basis from the south of town. I know the patterns as do everybody else who uses that traffic pattern. It has been the best part of my commute, and it has gotten dramatically better with the Sunset Interchange.

The time that it is worst, as we all know, is between 7:15 and 7:25, Mondays, Tuesdays, Thursdays, and Fridays during the school year. It is worse then because of the start of the high school. If the high school times were changed outside of compute times, we would have dramatic benefits both in my own household, where I've got my school-age child, and within our commuting patterns and would not need the Southeast Bypass.

We currently don't need it, as we've heard, because of the EIS. It doesn't solve the real traffic problems in Issaquah, which are Gilman Boulevard and Front Street. This

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1. Your comments have been noted and will be considered in the City's decision for this project.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 does not solve those problems.

2 In addition, I've spent a lot of years working on  
3 transportation solutions and financing. There is no  
4 financing for this project at the state or regional level.  
5 If there is to be financing, it would be at the local level:  
6 Taxpayers. As a taxpayer, I do not want to put money  
7 towards something which has environmental impacts and does  
8 not solve our traffic problems.

9 For those who say that Second Avenue is not a  
10 solution, they have not looked at the dramatic improvement  
11 that has already taken place. Second Avenue is a solution.  
12 It should have been looked at. I agree with the speakers  
13 who have said that this study is absolutely fatally flawed.

14 As decision makers, elected officials can start  
15 looking at a subject, and it's easier to keep looking at it.  
16 It's easier to say We can solve all these problems in the  
17 design stage. But it wastes more money, and that money can  
18 be better spent on remodeling this school. That should be  
19 the priority of our taxpayers, not a useless road.

20 Second Avenue is the people's choice. The bypass is  
21 the developers' choice. I would urge the city council to  
22 work with the people on the people's choice.  
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2

2. Alternatives considered for the proposed project are discussed in Chapter 2 of this Final EIS. Chapter 2 contains a summary of why 2nd Avenue was not selected for consideration. Its proximity to the city, to three schools, and its functional classification as a collector arterial make it undesirable for use as an urban arterial intended for pass-through trips around the Front Street corridor. Upgrading 2<sup>nd</sup> Avenue would also entail considerable cost for needed right-of-way and capacity improvements.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF JOHN SHERIDAN

Good evening. I'm John Sheridan. I live at 675  
Jasmine Place Northwest here in Issaquah.

And I think I'd come here a little bit build the road,  
pretty reasonable. I don't have a science background, and I  
think the intentions for both sides are -- I believe they  
are honorable. However, I do have concerns also.

And I do see the bypass as part of the solution. I do  
want quaint shops to survive here. So I guess what I'm  
getting at is I'm going to look upon this as the Ben  
Franklin approach, the pros and the cons. I do want the  
quaint shops to survive here. I don't want high levels of  
traffic along Front Street.

However, I do have a strong suspicion that, yes, when  
you build it, and especially the bypass -- I am a little  
suspicious of the name, you can also add. Is it not called  
Park Pointe Boulevard? And why?

And I look. I see the noise. And let's face it. I  
don't think we're equipped with the training to become a  
city. We're a town, yes. We will be a big town. But I see  
Squak, Cougar, the plateau, and Tiger. This is the last  
hill. I don't think we need to be staring at a 50-foot  
retaining wall.

And I may not be the strongest environmentalist, per

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 se. I think Mother Nature has a way of caring for herself.  
 2 But why is it that, starting September, our water, the  
 3 drinking water now has to be fluoridated and chlorinated?  
 4 Why is that? And I'm raising suspicions of how much worse  
 5 will it be. And the noise, too. I feel sorry for those in  
 6 our historic section for putting up with all that noise from  
 7 the Sunset Interchange. But I do say, I think it was a good  
 8 job.

9 I think we should look at widening State Route 900.

10 One other question I have is why is it just one road to  
 11 Talus. See, that's more convenience for them. Why not go  
 12 all the way? Why not look at more synchronized lights, you  
 13 know, be completed? Newport Way, more sidewalks. And if  
 14 you're in Park Pointe there, I think you should have a real  
 15 park. And I'm concerned about the Sportsman's Club, even  
 16 though I don't hunt or shoot guns. What will happen to  
 17 that? I think King County would say, Oh, can't have guns  
 18 firing too close to the road. So I think they would be gone  
 19 and a part of the history as well.

20 So I think this is just a part solution. And let's  
 21 look at how wide I-90 is and how that backs up. I see this  
 22 as a detour. I can sympathize with both sides. I want a  
 23 solution, yes. I just worry about the traffic -- the cost  
 24 overruns. I think it's ridiculous, really, that starting at  
 25 about 15, 20 million, if I recall; and now we're looking at

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1. Comments noted. Impacts and mitigation measures for water quality and noise issues under Modified Alternative 5 are addressed in Chapter 3 of this FEIS. With mitigation, the proposed project is not expected to result in adverse impacts on water quality and noise.

2

2. Alternatives considered for the proposed project are identified in Chapter 2 of this Final EIS. Newport Way and a portion of SR 900 were reviewed and rejected because they would not meet screening measures used to evaluate potential alternative routes.

3

3. Selection of North C in the Preferred Alternative avoids the Issaquah Sportsmen Club building, thus removing potential impact to the building. During the 404 Merger Process review it was determined that the proposed project would have no adverse effect on historic or cultural resources. Additional information regarding potential impacts on the Sportsmen's Clubhouse is provided in Chapter 3 of this Final EIS.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 potentially 60 million. Fire the highway department for  
 2 that estimate -- ridiculous. Don't we wish we had stocks  
 3 and bonds that triple in ten years? Do you know what I  
 4 mean? They're not even reality. We need more competition.

5 And it's one thing to have a bypass; but again, Park  
 6 Pointe Boulevard access road to 600 more homes times three  
 7 or four trips per day, it defeats the whole purpose of  
 8 having a bypass. Do you know what I mean? So I just have  
 9 to say that. I want businesses to prosper. Why not have a  
 10 little Park 'N Ride down on the Issaquah-Hobart Road? To be  
 11 honest with you, I'd rather have a trolley running along the  
 12 back out that, you know, the road to -- the path at the base  
 13 of Tiger Mountain right now.

14 So what can I say? I have concerns. I say the only  
 15 solution is to put it the vote with the people. That's the  
 16 best way. You know, there's a lot of pressure on the city  
 17 council right now, but let's just have an up-and-down vote.  
 18 Let's look at little fixes everywhere, not just one road.  
 19 And it really is a regional problem that we're dealing with.  
 20 Finish Highway 18.

21 Thank you.  
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5. In 2004 the Issaquah City Council approved an amendment to the Comprehensive Plan eliminating the Urban Village land use designation on the Park Pointe property. Under the new low-density residential designation, the Park Pointe project would include up to 356 residential units. That project is undergoing separate environmental review by the city. King County and Sound Transit will determine if future provisions for a park and ride south of the city will be made.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF DAVID WILLIAMS

My name's David Williams. I live at 580 Front Street South.

The EIS fails to mention quantitative mitigation for the degradation of the view of Tiger Mountain for residents of the whole Puget Sound region due to the proposed retaining walls and housing development. Tiger Mountain is Issaquah's only remaining unbroken expanse of forested mountainside, and changing this will diminish our quality of life forever.

The statement suggests that view impacts will be minimized. The term "minimized" is subjective and misleading. We will still be able to see a road and traffic where there was once a beautiful forest. The SDEIS should include the proposed mechanism of lower property taxes to account for the degradation in residents' quality of life due to the loss of pristine forested backdrop of our town.

An alternative mitigation would be for the owners of Park Pointe to pay a royalty to every resident of the region who looks at Tiger Mountain in the future and finds the view spoiled. This would be fair and right since the bypass will open up the mountain for development and the owners stand to profit significantly from our loss of the view.

The bypass is built directly on top of the aquifer

1. The DSEIS visual analysis followed appropriate state and federal procedures and was reviewed and approved by the FHWA and WSDOT prior to issuance of the DSEIS. The proposed project would be designed to reduce potential visual impacts as much as possible. The proposed project would occur at the base of Tiger Mountain and is not intended to result in degradation of views or the diminishment of the quality of life in the region. The SDEIS acknowledges that, combined with the proposed Park Pointe development, views from some locations near the roadway would become more urban than existing views.

2. The City has received your comment and appreciates your input.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 which supplies drinking water to Issaquah. We don't know  
 2 what the effects of this construction on the aquifer will  
 3 be. I want to see a full backup plan for supplying drinking  
 4 water in the case of a catastrophic failure of our drinking  
 5 water supply due to the destruction of the aquifer, either  
 6 from the construction itself or from toxic chemicals leaking  
 7 into the ground after a chemical or petroleum tanker  
 8 overturns on the road. Simply putting up signs telling  
 9 drivers to be careful, as is suggested in the SDEIS, is not  
 10 sufficient mitigation for this possibility.

11 The four infiltration ponds will regularly overflow  
 12 dumping oil, radiator fluid, windshield-washing fluid,  
 13 asbestos, and rubber from the surface of the Issaquah bypass  
 14 into the East Issaquah Creek. A full study should be done  
 15 on the effects of this to the creek, its wildlife, and  
 16 adjacent property.

17 The bypass effectively causes Issaquah residents to  
 18 subsidize the lifestyle of people living outside the city  
 19 boundaries. A much better discussion must be presented in  
 20 the statement of how to gain their financial support for the  
 21 bypass.

22 And finally, the biggest problem with the SDEIS is  
 23 that it proposes a solution which is a temporary at best and  
 24 ultimately encourages more of the congestion it attempts to  
 25 alleviate. We can see from the experiences of cities like

3

3. Potential impacts on groundwater recharge under Modified Alternative 5 are addressed in Chapter 3 of this FEIS. Analysis indicates that the proposed project could result in a 0.10 percent (1/1000) reduction in total recharge volume in the Lower Issaquah Valley aquifer. If additional testing confirms the infiltration potential for proposed stormwater ponds, no reduction in aquifer recharge would be expected because nearly all runoff from the proposed roadway would be eliminated.

4

4. The proposed ponds would be designed in accordance with appropriate standards. The proposed stormwater facilities would not contribute substantial pollutant volumes to local waterways, as described in Chapter 3 of the Final EIS.

5

5. Your comments are noted. Funding for the proposed project has not been determined and would likely include federal, state and local sources. The city share of the total project cost would be in the order of 14-20%.

6

VAN PELT, CORBETT & ASSOCIATES  
 423 2nd Ave. Ext. S, #21 \* Seattle, WA 98104 \* 206-682-9339

## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 Los Angeles that more roads never lead to less traffic in  
2 the long run. The bypass is a short-term Bandaid for the  
3 symptoms of urban sprawl but does nothing to stop sprawl and  
4 congestion over time. Therefore, alternatives that provide  
5 either density zoning and/or lead to mass-transit solutions  
6 must be much more heavily discussed in the SDEIS.

7 Thank you.  
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6

6. Your comments are noted and will be considered in the City's decision for the project.

VAN PELT, CORBETT & ASSOCIATES  
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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF BARBARA SHELTON

Hi, I'm Barbara Shelton. I live at 23851 Southeast 98th Place.

The SDEIS is fatally flawed. The city council requested the bypass project obtain a study of the railroad-grade alignment and provide greater detail on the no-build alignment. Only the railroad grade was studied in depth. No mitigations were recommended for the no-build alignment that would render it more effective. Dozens of projects have been proposed that could help traffic congestion, but SDEIS merely lists a couple and does not examine a constellation of several less expensive possibilities.

The SDEIS is fatally flawed. The purpose of the proposed road are to decrease Front Street congestion and increase the access to I-90. Again, the need is not resolved nor the purpose realized. Yes, traffic congestion will decrease on the Front Street corridor in the short term. By 2030, it will be failing again. But the SDEIS doesn't tell us how many years out. One? Five? Ten? How can we evaluate if this road is useful and if any usefulness is worth the cost?

The SDEIS is fatally flawed. It doesn't propose where the funding will come from for the bypass. Our money at

1

1. Mitigation measures are considered for the No Action alternative in the SDEIS. Alternatives that meet the project's goal of reducing congestion between I-90 and Issaquah Hobart Road were evaluated in depth during the course of the EIS process. The reader is referred to Chapter 2 for a discussion of all alternatives considered during the course of the EIS process. Other alternatives to the proposed project have been suggested in comments, but are not reasonable because they are not effective in reducing congestion. Project-specific actions in place of the proposed SE Bypass would be subject to separate environmental review and approval by the city.

2

2. The proposed project's purpose and need are identified in Chapter 1 of this FEIS and include relieving congestion on Front Street and improving access to local interchanges. Traffic data for the proposed project indicate that Modified Alternative 5 would substantially improve operations for north-south travel conditions and accessibility to I-90 from Front Street and the proposed SE Bypass roadway.

3

3. Funding for the proposed project has not been determined and would likely come from federal, state and local sources. The city share of the total project cost would be in the order of 14-20%. If funding is not available the proposed project would not be constructed. The proposed project would be one of only several actions the city may take to address traffic congestion. The city is currently pursuing review of a potential I-90 undercrossing and implementation of an Intelligent Transportation System to improve traffic light operations. However, those projects won't relieve congestion that the Southeast Issaquah Bypass it intended to address.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 hand has actually shrunk. We can access federal money only  
2 if the road is built to four lanes. That's not proposed for  
3 several years after the two-lane road is built with Issaquah  
4 money. What happens if the council votes to build and  
5 there's no money in the city coffers? What if it goes  
6 30 million over like the Sunset Interchange? Why not spend  
7 the local money on local fixes like an I-90 undercrossing  
8 and synchronized lights first?

9 The SDEIS is fatally flawed by its omissions,  
10 inaccuracies, and incomplete information. It's time to stop  
11 paying for studies we can't use to make a reasonable  
12 decision. The council can make a resolution to spend no  
13 more money on studies for this road. According to the  
14 SDEIS, the council can make a decision to build or not at  
15 any time from August '04. I hope they have the courage to  
16 vote no now.

17 These are only a few of the petitions that will be  
18 presented to the council requesting this action. Someone  
19 asked me if it was possible for the council to vote no after  
20 spending over 3 million to date. My response was that that  
21 was done by several councils, including the current one.  
22 And my hope would be that this current council would not  
23 want the legacy of making the decision to build a costly,  
24 ineffective road that supplants projects that probably would  
25 have made a difference in Issaquah's congestion.

3

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1           Alternatively, I ask the council to choose the  
2       no-build alternative now. Is it only coincidence that  
3       there's a meeting tomorrow regarding the possibility of an  
4       I-605 from Snohomish to Pierce county?

5           Thank you.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF DALLAS GREEN

My name is Dallas Green. I live at 10012 238th Way Southeast. And I work here in Issaquah.

I live just outside the city limits, and I drive my bicycle along this Issaquah-Hobart Road three to four days a week. And since the Sunset exit has gone in, I've noticed a dramatic improvement. All of the congestion occurs before Second Avenue. From that point on, I've seen a dramatic increase.

So it's not hard to see that the bypass is just going to do the same thing. It will solve a small area within that mile through town, but it's just pushing the problem another mile south. I urge the planners and the city council to just use extreme caution before they destroy the national resources that lay in the path of the proposed bypass. It will be surrendering to all of these people that I pass on my bike. Seeing them, every one them is a single person in cars. It's ridiculous to sacrifice all of these natural resources and Issaquah taxpayers' money for those people.

Thank you.

1

1. Your comments are noted. The proposed project is not intended to result in adverse impacts on natural resources in the project area. Please see Chapter 3 of this FEIS for impacts and mitigation measures associated with Modified Alternative 5.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF KELLY RICHARDSON

Good evening. My name is Kelly Richardson. And I live at 14910 262nd Avenue Southeast in Issaquah. And I actually grew up here. It's a wonderful city.

And I am concerned about the traffic. We get stuck in traffic every single day. And I have read the impact statement, and I find it to be accurate. It is the greatest good. So we need to go with common sense, and we need to actually apply the greatest good and continue on from there. So we should go forward with the bypass.

Thank you.

1

1. Your comments have been noted and will be considered for the FEIS.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF WILLIAM N. ERISINGER

I'm William Erisinger. I live at 514 Southeast Bush, Issaquah.

I'm about three blocks from where the bypass is going to be. It is not a plus for our good neighborhood, but it's a plus for the city. And I think, therefore, you ought to go ahead with it. It is the best thing we've got to mitigate traffic. We ought to do everything. We ought to do all things to mitigate traffic, but it would be foolish to ignore the single most effective item we have to mitigate traffic.

The issue comes up about how do the residents of the city feel about this. And in the city council race last year, Russell Joe against Bryan Weinstein, this was a key issue. Russell Joe was basically, if the numbers came out right, he would favor the bypass; but he was going to wait to see the impact statement. Bryan Weinstein was strongly opposed. Bryan Weinstein lost by better than two to one. Admittedly, Russell Joe has other things going for him. That did affect it, too. The city, anyone who clearly felt strongly that this was a key issue for the city, would have voted for Bryan Weinstein.

Okay. Basically, the bypass won't solve all the problems, but it's a good first step, and I would like to see the city take it.

1

1. Your comments have been noted and will be considered for the FEIS.

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## STATEMENT OF WAYNE MILYKO

My name is Wayne Milyko. I live at 19225 Southeast May Valley Road, Issaquah/unincorporated King county.

There's many things I am. I am not from Issaquah originally. I grew up in Connecticut. I appreciate and I want to thank the people who spent so much time studying and reviewing this impact statement, sharing what they found, what they feel about it, sharing some of the traditions and history of Issaquah.

All I can share is some of my own reflections of life and what changes have done around me. I am a one-car family. And like someone previous to me I ride my bike to from work at least two days a week. The irony is I'm a school bus driver here. I'm a professional driver. I have been in many areas of this nation. I've driven in New York City as an express driver.

You don't have a traffic problem here. I had to slow down on Issaquah-Hobart Road on my way here. That was because a tractor was moving down the road. I have had to stop at other times during the year with my bus or my car, mostly because they were cleaning up the debris from the windstorms. The stops I see on the road are, well, myself, 'cause it's my job to stop so some of the kids get to and from my bus safely.

1. Your comments are noted and will be considered in the City's decision on the project.

1

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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1           The visions of changes from what I've seen, where I'm  
2           from, when I grew up I had a favorite tree; and it was a  
3           willow tree. It fell over. So I took the branches, and I  
4           planted four more trees. Well, my dad cut three of those  
5           over mowing the lawn. So I built a fence around the last  
6           one. It's still there. It's over 80-feet tall. But behind  
7           it is one of the entrance ramps to I-84 down to Hartford,  
8           Connecticut, where I grew up, not the forest that I really  
9           enjoyed playing in as a kid. You can't touch that with an  
10          impact statement.

11          I'm also an amateur spelunker. I used to love  
12          travelling to South Dakota and going to Crystal Caverns --  
13          pristine, wonderful area 'till they decided to paint the  
14          parking lot. Now it's dull, and it's a drab area. I don't  
15          spelunk there anymore.

16          Keep these things in mind. How can you judge what's  
17          an impact and what's not? I don't think you need this  
18          bypass.

19          Thank you.  
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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

1 MR. MATTOON: That was the last speaker card that  
2 I have for anyone who has signed up to speak tonight.  
3 Unless I missed a card someplace, I declare this  
4 hearing adjourned. Thank you all again for coming.

5 [Hearing concluded at 8:24 p.m.]  
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## SOUTHEAST ISSAQUAH BYPASS HEARING, 7-15-04

## C E R T I F I C A T E

STATE OF WASHINGTON )  
 ) SS  
 COUNTY OF King )


I, Jacqueline L. Bellows, a Notary Public in and for  
 the  
 State of Washington, do hereby certify:

That the foregoing hearing was taken before me at the  
 time and place therein set forth;

That the statements of the witnesses and all remarks  
 made at the time of the hearing were recorded stenographically  
 by me, and thereafter transcribed under my direction;

That the foregoing transcript is a true record of the  
 statements given by the witnesses and of all remarks made at  
 the time of the hearing, to the best of my ability.

Witness my hand and seal this 23RD day of  
 July 2004.

  
 Jacqueline L. Bellows, Notary  
 Public in and for the State  
 of Washington, residing at  
 Arlington. Commission  
 expires October 18, 2006.

VAN PELT, CORBETT & ASSOCIATES  
 423 2nd Ave. Ext. S, #21 \* Seattle, WA 98104 \* 206-682-9339

## **Postcards**

**(Following are postcards submitted during the comment period in support of the proposed project)**

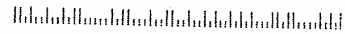
Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
P. O. Box 1307  
130 E. Sunset Way  
Issaquah, WA 98027

AUG 31 2004

CITY OF ISSAQUAH  
OFFICE OF THE MAYOR



**Fix Traffic Now  
Yes on SE Bypass**

To Mayor Ava Frisinger & Issaquah City Council:

Ensure Quality of Life in Issaquah

Today & For Future Generations

Name SHELLEY FREEDMAN  
Address 16808 240th Ave. SE.  
Maple Valley WA 98038



Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
P. O. Box 1307  
130 E. Sunset Way  
Issaquah, WA 98027

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## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

Ensure Quality of Life in Issaquah

Today & For Future Generations

Name Rick Freeman  
Address 16808 240th AVE S.E.  
Maple Valley 98038

Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
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## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

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Today & For Future Generations

Name TIM DILLER

Address 10514 128TH AVENUE  
KIRKLAND, WA 98033

**Fix Traffic Now  
Yes on SE Bypass**

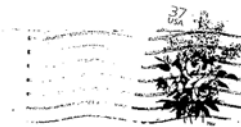
To Mayor Ava Frisinger & Issaquah City Council:

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Today & For Future Generations

Name CYNTHIA FORADORY  
Address 195 Front Street North  
Issaquah, WA 98027

Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
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Issaquah Chamber of Commerce  
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Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
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04

## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

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Today & For Future Generations

Name CARL EASTER

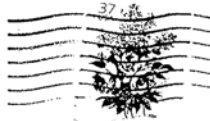
Address 24409 SE 20TH PL

SAMMAMISH, WA 98075

*Carl Easter*

WORKS ON  
FRONT ST.

Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



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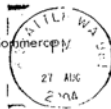
To Mayor Ava Frisinger & Issaquah City Council:

Ensure Quality of Life in Issaquah

Today & For Future Generations

Name ISA LAI MANA  
Address 220 Newport Way SW.  
ISSAQUAH

Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
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## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

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Today & For Future Generations

Name Vane Garrison

Address 195 Front St. N.

Issaquah, 98027

Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
P. O. Box 1307  
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Issaquah, WA 98027

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**Fix Traffic Now  
Yes on SE Bypass**



To Mayor Ava Frisinger & Issaquah City Council:

Ensure Quality of Life in Issaquah

Today & For Future Generations

Name SHE HERMANIDES  
Address 31 SUNSET CT NW  
ISSAQUAH WA 98027

03

Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
P. O. Box 1307  
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Issaquah, WA 98027

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**Fix Traffic Now  
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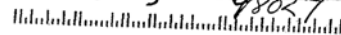
Ensure Quality of Life in Issaquah

Today & For Future Generations

Name TODD SPEISER

Address 1775 TWELFTH AVE NW, #101

ISSAQUAH, WA 98027





Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
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## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

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Today & For Future Generations

Name Mimi BERGER

Address PO Box 912  
CARNATION WA 98014

Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
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## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

Ensure Quality of Life in Issaquah

Today & For Future Generations

Name LEON HERMANIDES  
Address 31 SUNSET CT NW  
ISSAQUAH WA 98027

Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
P. O. Box 1307  
130 E. Sunset Way  
Issaquah, WA 98027

AUG 25 2004

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04

## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

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Today & For Future Generations

Name Richard Symms

Address 1595 NW Gilman Blvd  
ISSAQUAH, WA 98027

Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
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## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

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Today & For Future Generations

Name Claudia S. Nelson  
Address 5767 176th Rd SE  
Bellevue, WA 98006

Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



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## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:



Ensure Quality of Life in Issaquah

Today & For Future Generations

Name VICKI L. STIER  
Address 149 LOUIS THOMPSON RD. NE.  
SAMMAMISH, WA 98074

Name DALE STIER  
Address 149 LOUIS THOMPSON RD NE  
SAMMAMISH, WA 98074

Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
P. O. Box 1307  
130 E. Sunset Way  
Issaquah, WA 98027

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94



## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

Ensure Quality of Life in Issaquah

Today & For Future Generations

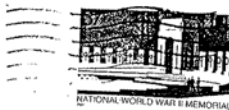
Name

*Heddie Picards*

Address

*22463 SE Highland Terrace  
Issaquah, WA 98029*

Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027 AUG 27 1



Mayor Ava Frisinger & City Council  
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## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

Ensure Quality of Life in Issaquah

Today & For Future Generations

Name

*Huold & Ellen Lucia*

Address

*14408 26th Ave SE*

*Issaquah, WA 98027*

Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
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Issaquah, WA 98027

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## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

Ensure Quality of Life in Issaquah

Today & For Future Generations

Name

*Dan & Stormy Hayes*

Address

*15600 Issaquah-Hood Rd  
Issaquah, WA 98027*



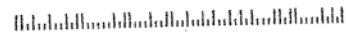
Issaquah Chamber of Commerce  
155 NW Gilman Blvd.  
Issaquah, WA 98027-1515



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## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

Ensure Quality of Life in Issaquah

Today & For Future Generations

Name

*John & Lee Ann Hayes*

Address

*14919 Issaquah-Hunter Rd  
Issaquah, WA 98027*

Issaquah Chamber of Commerce  
155 NW Gilman Blvd  
Issaquah, WA 98027



Mayor Ava Frisinger & City Council  
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130 E. Sunset Way  
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## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

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Today & For Future Generations

Name

Address

*Jim Hayes*  
*25320 S. E. 71st Ave.*  
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Issaquah Chamber of Commerce  
155 NW Gilman Blvd  
Issaquah, WA 98027



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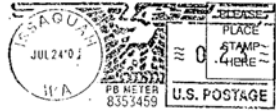
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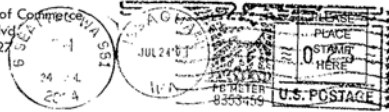
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Name

Address

*William H. Strauss*  
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## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council:

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Today & For Future Generations

Name

Address

*Diane Jupp*  
*1810 15TH PL NW*  
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Issaquah, WA 98027



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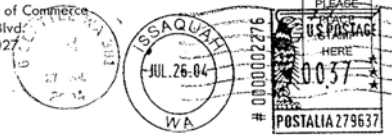
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Name Chuck Metzger  
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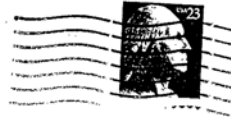
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Name Tom R. Covello  
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Issaquah, WA 98027



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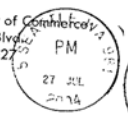
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Name Nick Whitefield  
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Preston, WA 98050

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Issaquah, WA 98027



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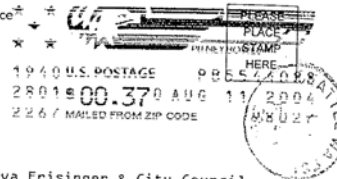
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# Fix Traffic Now Yes on SE Bypass

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Name George Coulter  
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Name

Address

*The Mad Scrapers*  
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Issaquah WA 98027





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Issaquah, WA 98027



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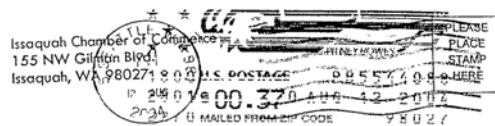
## Fix Traffic Now Yes on SE Bypass

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Name DEANNA GLENN  
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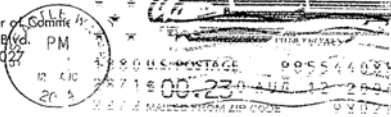
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Today & For Future Generations

Name Sin Ploc-gma-  
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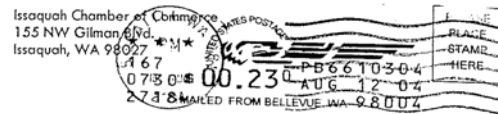
**Fix Traffic Now  
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Name Diane Childs  
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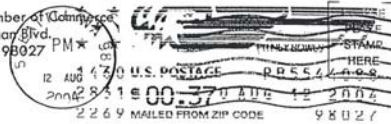
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Name Mananne Young ✓  
Address 1595 NW Gilman Blvd #12  
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Issaquah Chamber of Commerce  
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Issaquah, WA 98027



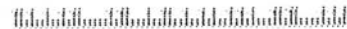
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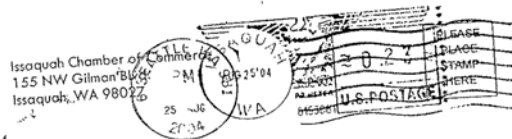
Ensure Quality of Life in Issaquah

Today & For Future Generations

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02773445

## Fix Traffic Now Yes on SE Bypass

To Mayor Ava Frisinger & Issaquah City Council

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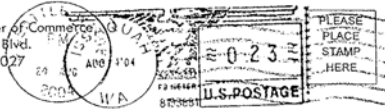
Name Barney Davis  
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Name Shirley Davis  
Address 26603 NE 24th  
Redmond, WA 98053

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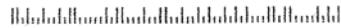


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Issaquah, WA 98027



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Issaquah, WA 98027

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Name E. FRICKMAN  
Address 16808 240th AVE SE  
Maple Valley 98038

---

*Appendix D*

***2010 Year of Opening Traffic Analysis  
Final Environmental Impact  
Statement Technical Memorandum***



**To:** Pam Fox (City of Issaquah)  
**From:** Anjali Bhagat (PB)  
**Copy:** Karl Winterstein, Jeff Buckland (PB)  
**Date:** June 12, 2006  
**Subject:** Southeast Issaquah Bypass Project: Modified Analysis to Reflect  
a New Opening Year of 2010 and Traffic Analysis of Alternative 5

### **Background**

The Southeast Issaquah Bypass Road traffic analysis was completed in 2003, and had assumed an opening year of 2005 and a design year of 2030. Given the project history since the completion of the traffic analysis (2003) it was determined that the opening year be shifted to year 2010. Year 2010 traffic analysis results for the No Action and Build alternatives are presented in this technical memo.

Since the completion of the traffic analysis work in 2003, it has been concluded that Alternative 5 is the preferred alternative. The primary difference between this alternative and the subsequent alternatives is the proposed southern end tie-in of the Southeast Bypass Road, Front Street, and Issaquah Hobart Road intersections. Please refer to Figure 1 for an illustration of Modified Alternative 5.

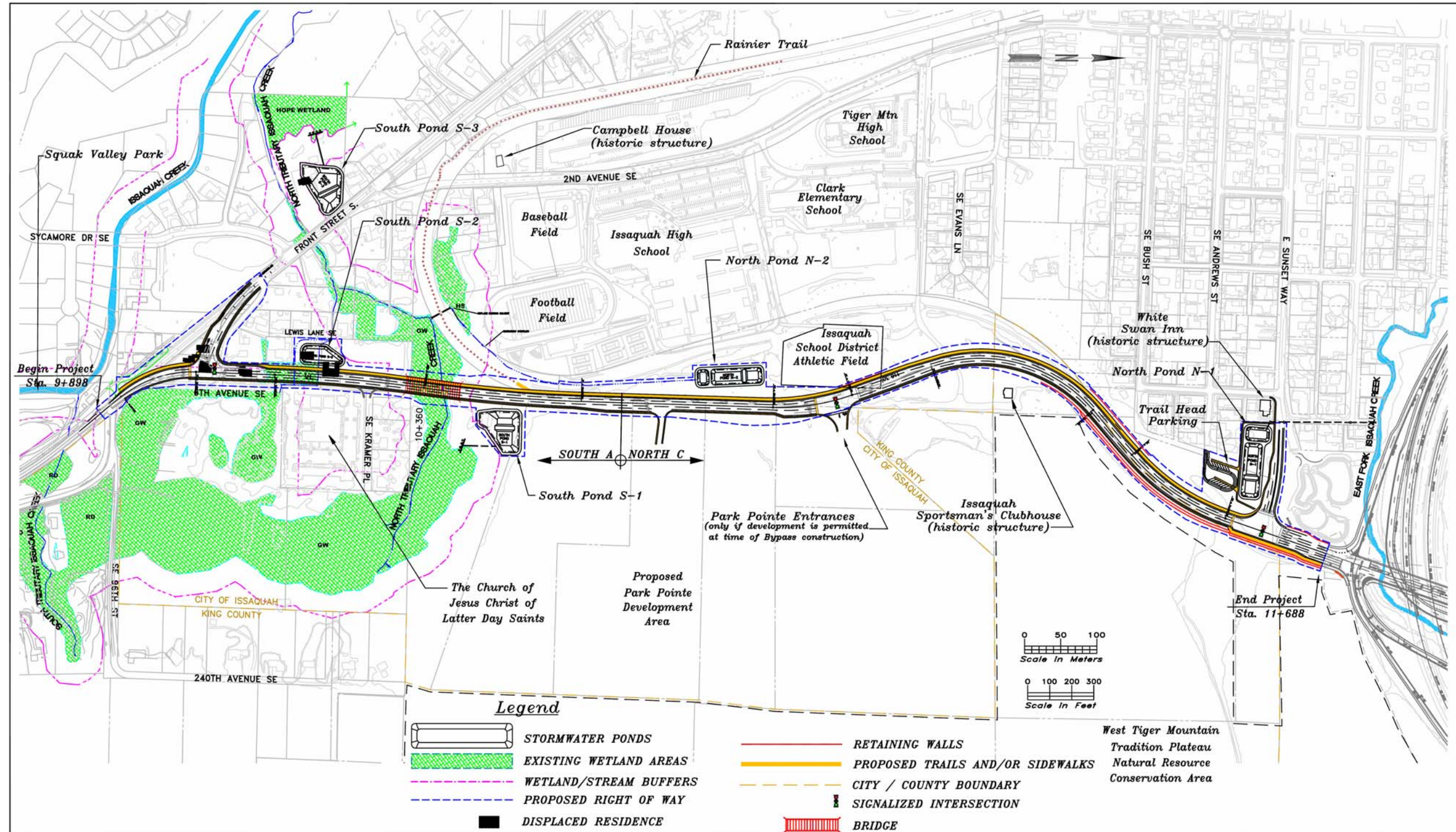


Figure 2: Modified Alternative 5





## Alternatives Evaluated

The alternatives evaluated in this technical memo are the following:

- **Year 2010 No Action (AM and PM Peak Hours):** The corridors evaluated include Front Street, Second Avenue, and Sunset Way.
- **Year 2010 Build (AM and PM Peak Hours):** This assumes the Alternative 5 alignment in place for the Southeast Bypass. The corridors evaluated include Front Street, Second Avenue, Sunset Way and the Southeast Bypass Road.

*The channelization recommended for the southeast leg of the Southeast Bypass, Front Street, and Issaquah-Hobart Road intersection is one exclusive northbound (NB) left-turn lane, and one exclusive NB through lane.*

## Methodology

From the prior traffic analysis work, the travel model was developed for years 2005 and 2030. This data (year 2005 and 2030 traffic projections) were used to compare and extrapolate growth rates in order to develop Year 2010 traffic volumes for the AM and PM peak hours.

The Synchro/SimTraffic software package was used to evaluate traffic operations. Since the completion of the traffic analysis in 2003, the software package has been upgraded and the upgraded version was used for this analysis.

## Traffic Analysis Results

### Opening Year 2010: No Action and Build

Tables 1-3 describe traffic operation projected in the year 2010 for the No Action and Build alternatives for both AM and PM peak hours.

Operations along Front Street, Second Avenue and Southeast Issaquah Bypass Road are summarized in Tables 1-3, respectively.

**Table 1: Front Street Year 2010 LOS and Intersection Delay**

	No Action Scenario		Build Scenario	
	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
Front/Westbound (WB) I-90 Ramps	LOS E 56 sec/veh	LOS B 16 sec/veh	LOS C 33 sec/veh	LOS F >80 sec/veh
Front/Eastbound (EB) I-90 Ramps	LOS E 67 sec/veh	LOS F >80 sec/veh	LOS B 15 sec/veh	LOS F >80 sec/veh
Front/Gilman	LOS E 71 sec/veh	LOS F >80 sec/veh	LOS E 75 sec/veh	LOS F >80 sec/veh
Front/Dogwood	LOS C 28 sec/veh	LOS A 8 sec/veh	LOS A 10 sec/veh	LOS B 12 sec/veh
Front/Sunset	LOS D 43 sec/veh	LOS C 24 sec/veh	LOS F >80 sec/veh	LOS B 17 sec/veh

Overall, traffic operations along Front Street improved or stayed the same when the No Action and Build scenarios are compared. The only exceptions are at the intersections of Sunset Way (AM peak hour) and the WB I-90 ramps (PM peak hour). The inclusion of the Bypass allows for available capacity along Front Street. This available capacity makes the the Front Street/I-90 intersection more attractive, therefore degrading in operation. Under the No Build scenario, congestion along Front Street was over capacity (north and south of the intersection), and vehicles could not access the intersection.

**Table 2: Second Avenue Year 2010 LOS and Intersection Delay**

	No Action Scenario		Build Scenario	
	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
Second/Sunset	LOS A 9 sec/veh	LOS B 12 sec/veh	LOS B 14 sec/veh	LOS A 4 sec/veh
Second/Bush	LOS B 11 sec/veh	LOS F >80 sec/veh	LOS A 3 sec/veh	LOS A 3 sec/veh
Second/Front	LOS F >80 sec/veh	LOS D 48 sec/veh	LOS D 38 sec/veh	LOS A 5 sec/veh



A substantial improvement along Second Avenue can be observed (Table 2) between the No Action and Build scenarios. The improved operations in the Build scenario are attributed to vehicles using the Southeast Issaquah Bypass rather than Second Avenue. Given that the Front Street corridor is heavily congested, many drivers use Second Avenue as an alternate route. With the inclusion of the Southeast Issaquah Bypass Road, vehicles are attracted to that facility rather than Second Avenue.

**Table 3: Southeast Issaquah Bypass Road Year 2010 LOS and Intersection Delay**

	AM Peak Hour	PM Peak Hour
Southeast Bypass Road & Sunset Way	LOS A 8 sec/veh	LOS D 43 sec/veh
Southeast Bypass Road & Park Pointe Access	LOS B 16 sec/veh	LOS F >80 sec/veh
Southeast Bypass Road/Front Street/Issaquah-Hobart Road	LOS A 6 sec/veh	LOS C 22 sec/veh

The Southeast Issaquah Bypass Road serves as a bypass to Front Street. In the PM peak hour, queuing is observed along the corridor. This is primarily due to the fact that south of the Southeast Bypass/Front Street/Issaquah Hobart Road intersection, the north/south corridor tapers to one lane.

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*Appendix E*

***Air Quality Analysis Final  
Environmental Impact Statement  
Technical Memorandum***

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**Southeast Issaquah Bypass**  
Final Environmental Impact Statement

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**To:** Pam Fox (City of Issaquah)

**From:** Ginette Lalonde (PB)

**Copy:** Karl Winterstein, Jeff Buckland (PB)

**Date:** June 10, 2006

**Subject:** SE Issaquah Bypass Project: Air Quality Analysis of Modified Alternative 5 and New Opening Year of 2010.

### **Background**

The SE Issaquah Bypass Road air quality analysis was completed in 2003, and had assumed an opening year of 2005 and a design year of 2030. Given the project history since the completion of the traffic analysis (2003) it was determined that the opening year be shifted to year 2010. Year 2010 air quality analysis results for the No-Action and Build alternatives are presented in this technical memo.

Since the completion of the traffic analysis work in 2003, a new Build Alternative has been developed, known as Alternative 5. The primary difference between this alternative and the subsequent alternatives is the proposed southern end tie-in of the SE Bypass Road, Front Street, and Issaquah Hobart Road intersections. Please refer to Figure 2 for an illustration of the Alternative 5.

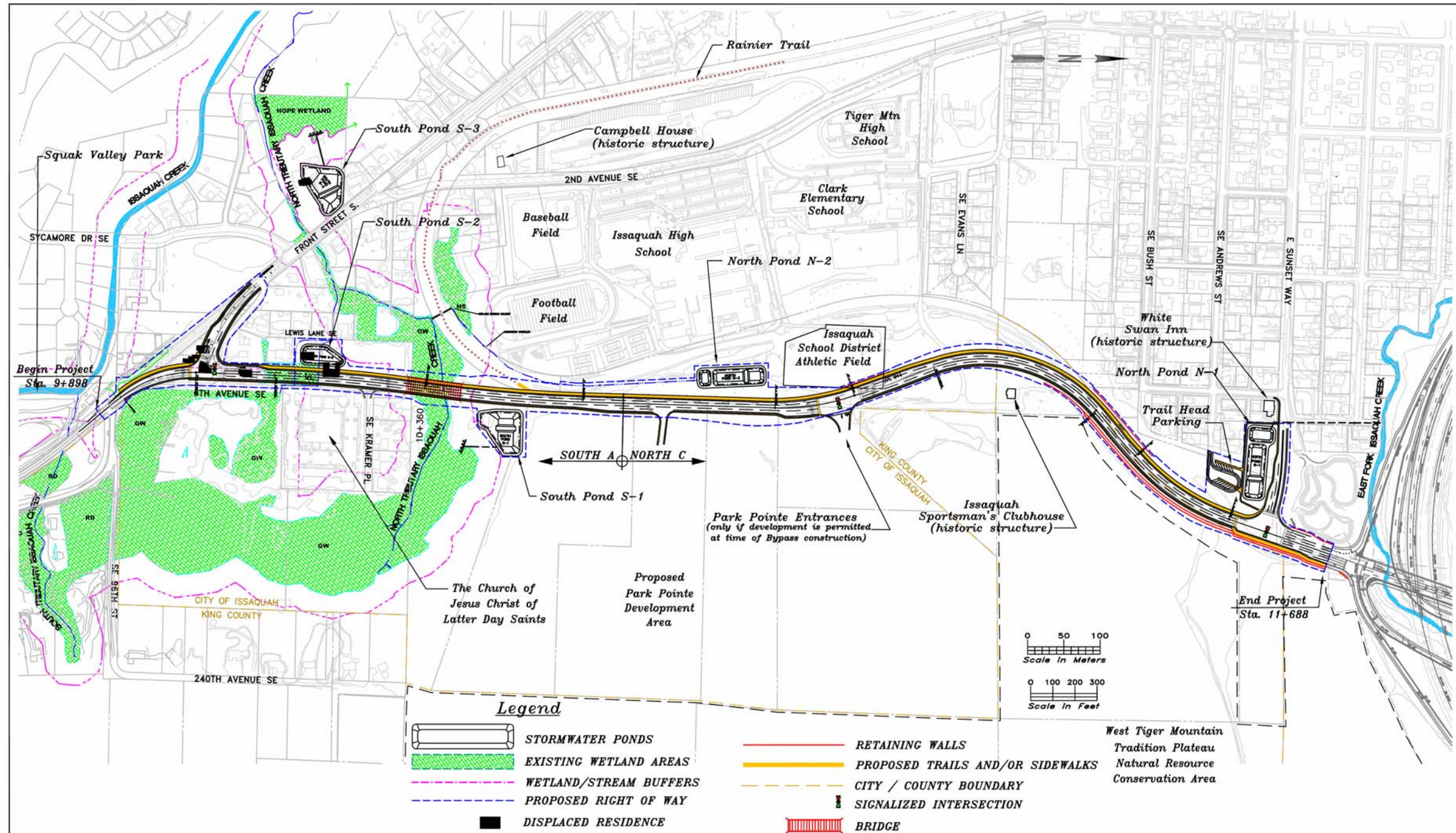


Figure 2: Modified Alternative 5



## **Alternatives Evaluated**

The alternatives evaluated in this technical memo are the following:

- **Year 2010 No Action:** The corridors evaluated include Front Street, Second Avenue, and Sunset Way.
- **Year 2010 & 2030 Build:** This assumes the Alternative 5 alignment in place for the SE Bypass. The corridors evaluated include Front Street, Second Avenue, Sunset Way and the SE Bypass Road.

*The channelization recommended for the southeast leg of the SE Bypass, Front Street, and Issaquah-Hobart Road intersection is one exclusive NB left turn lane, and one exclusive NB through lane.*

## **Methodology**

The methodology used in the assessment of impacts for air quality is the same as that used in Chapter 4 of the 2003 Draft Supplemental EIS Air Quality Appendix, with the exception MOBILE 6.2 analysis, the year of opening change, the Modified Alternative 5 configuration and the updated Mobile Source Air Toxics (MSAT) analysis.

### MOBILE 6.2

MOBILE 6.2 is an updated version of the Mobile Source Emission Factor Model computer program developed by the EPA to calculate carbon monoxide emissions factors from highway motor vehicles in the units of grams of pollutant per mile traveled. MOBILE 6.2 is used to calculate emission factors for the Final EIS. MOBILE 5b was used to calculate emission factors in the 2003 Draft Supplemental EIS.

### Year of Opening

From the prior air quality work, the analysis was conducted for a 2005 year of opening. The air quality analysis has been updated to reflect a 2010 year of opening.

### Modified Alternative 5

In the Supplemental Draft EIS, carbon monoxide levels were modeled at four intersections including: Sunset Interchange, Front Street and 2nd Avenue, Southeast Bypass and the Park Pointe Access Road, and Southeast Bypass and Issaquah Hobart Road. All four intersections are modeled for the no build alternative and the Modified Alternative 5 for the new year of opening 2010 and the build year 2030.

### Mobile Source Air Toxics

On February 3, 2006 FHWA released interim Guidance on Mobile Source Air Toxic (MSATs) analysis in NEPA documents. This guidance is interim because MSATs science is still evolving. Currently, EPA has not established regulatory concentration targets for relevant MSAT pollutants appropriate for use in the project development process. This project would create a new urban roadway with traffic volumes where the average annual daily traffic is projected to be less than 140,000 and it is unlikely to substantially increase MSATs emissions. Therefore, analysts conducted a qualitative assessment of emissions projection.

## **Studies and Coordination**

The affected environment in the analysis is the same as that used in Chapter 3 of the 2003 Draft Supplemental EIS Air Quality Appendix with the exception of the updated information on MSATs.

### Mobile Source Air Toxics

The Clean Air Act identified 188 air toxics, also known as hazardous air pollutants. The Environmental Protection Agency (EPA) has assessed this expansive list of toxics and identified a group of 21 as mobile source air toxics, which are set forth in an EPA final rule, *Control of Emissions of Hazardous Air Pollutants from Mobile Sources* (66 FR 17235). The EPA also extracted a subset of this list of 21 that it now labels as the six priority MSATs. These are *benzene, formaldehyde, acetaldehyde, diesel particulate matter/diesel exhaust organic gases, acrolein, and 1,3-butadiene*.



The EPA issued a Final Rule on Controlling Emissions of Hazardous Air Pollutants from Mobile Sources (EPA 2001). This rule was issued under the authority in Section 202 of the Clean Air Act. In its rule, EPA examined the impacts of existing and newly promulgated mobile source control programs, including its reformulated gasoline (RFG) program, its national low emission vehicle (NLEV) standards, its Tier 2 motor vehicle emissions standards and gasoline sulfur control requirements, and its proposed heavy duty engine and vehicle standards and on-highway diesel fuel sulfur control requirements.

The EPA is in the process of assessing the risks of various kinds of exposures to these pollutants. The EPA Integrated Risk Information System (IRIS) is a database of human health effects that may result from exposure to various substances found in the environment. The IRIS database is located at <http://www.epa.gov/iris>. The following toxicity information for the six prioritized MSATs was taken from the IRIS database *Weight of Evidence Characterization* summaries. This information is taken verbatim from EPA's IRIS database and represents the Agency's most current evaluations of the potential hazards and toxicology of these chemicals or mixtures.

- **Benzene** is characterized as a known human carcinogen.
- The potential carcinogenicity of **acrolein** cannot be determined because the existing data are inadequate for an assessment of human carcinogenic potential for either the oral or inhalation route of exposure.
- **Formaldehyde** is a probable human carcinogen, based on limited evidence in humans, and sufficient evidence in animals.
- **1,3-butadiene** is characterized as carcinogenic to humans by inhalation.
- **Acetaldehyde** is a probable human carcinogen based on increased incidence of nasal tumors in male and female rats and laryngeal tumors in male and female hamsters after inhalation exposure.
- **Diesel exhaust (DE)** is likely to be carcinogenic to humans by inhalation from environmental exposures. Diesel exhaust as reviewed in this document is the combination of diesel particulate matter and diesel exhaust organic gases. Diesel exhaust also represents chronic respiratory effects, possibly the primary noncancer



hazard from MSATs. Prolonged exposures may impair pulmonary function and could produce symptoms, such as cough, phlegm, and chronic bronchitis. Exposure relationships have not been developed from these studies.

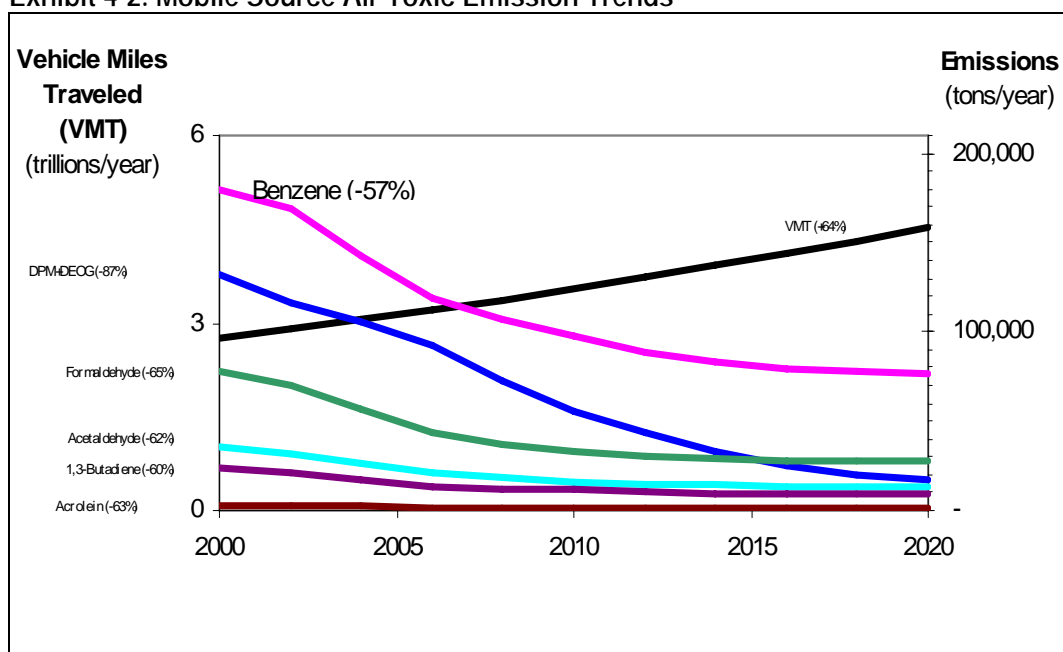
## Affected Environment

The affected environment in the analysis is the same as that used in Chapter 5 of the 2003 Draft Supplemental EIS Air Quality Appendix with the exception of the updated information on MSATs.

### Mobile Source Air Toxics

The EPA has issued a number of regulations that will dramatically decrease MSATs through cleaner fuels and cleaner engines. Between 2000 and 2020, FHWA projects that even with a 64 percent increase in vehicle miles traveled (VMT), these programs will reduce on-highway emissions of benzene, formaldehyde, 1,3-butadiene, and acetaldehyde by 57 percent to 65 percent, and will reduce on-highway diesel PM emissions by 87 percent, as shown in Exhibit 4-2.

Exhibit 4-2. Mobile Source Air Toxic Emission Trends



## **Construction Impacts**

### Modified Alternative 5

Construction air quality impacts for the Modified Alternative 5 are the same as those in Chapter 6 of the 2003 Draft Supplemental EIS Air Quality Appendix.

### No Build Alternative

No construction activities would take place under this alternative. Therefore, there would be no construction air quality impacts.

## **Operational Impacts**

### CO concentration for the Modified Alternative 5

The predicted worst-case CO concentrations under the Modified Alternative 5 for years 2010 and 2030 would not exceed the one-hour average or the eight-hour average for NAAQS for CO at any location (see Table 1 and 2). Predicted maximum one-hour CO concentrations from vehicle emissions under the Build Alternatives ranged from 4.5 to 6.6 ppm for the year 2010 and from 3.9 to 6.2 ppm for the year 2030 (Table 1). These values are all below the one-hour average NAAQS of 35 ppm for CO. Predicted maximum eight-hour CO concentrations from vehicle emissions under the Build Alternatives ranged from 3.2 to 4.6 ppm for the year 2010 and from 2.7 to 4.3 ppm for the year 2030 (Table 5). These values are all below the eight-hour average NAAQS of 9 ppm for CO.

**Table 1. Maximum One-hour Average CO Concentrations**

Scenario	Intersection			
	Sunset Interchange	Front Street and 2 <sup>nd</sup> Avenue	Southeast Issaquah Bypass and Park Pointe Access Road	Southeast Issaquah Bypass and Issaquah-Hobart Road
2010 Modified Alternative 5	6.2	4.5	6.6	6.1
2010 No Build Alternative	6.0	6.7	NA	NA
2030 Modified Alternative 5	6.2	3.9	5.5	5.9
2030 No Build Alternative	5.2	6.0	NA	NA
Notes: NA = Not Applicable (the intersection would not exist under this alternative) Concentration values are in parts per million (ppm). The one-hour average NAAQS for CO is 35 ppm.				

**Table 2. Maximum Eight-hour Average CO Concentrations**

Scenario	Intersection			
	Sunset Interchange	Front Street and 2 <sup>nd</sup> Avenue	Southeast Issaquah Bypass and Park Pointe Access Road	Southeast Issaquah Bypass and Issaquah-Hobart Road
2010 Modified Alternative 5	4.3	3.2	4.6	4.3
2010 No Build Alternative	4.2	4.7	NA	NA
2030 Modified Alternative 5	4.3	2.7	3.9	4.1
2030 No Build Alternative	3.6	4.2	NA	NA
Notes: NA = Not Applicable (the intersection would not exist under this alternative) Concentration values are in parts per million (ppm). The eight-hour average NAAQS for CO is 9 ppm.				

CO Concentrations for the No Build Alternative

The predicted worst-case CO concentrations under the No Build Alternative for years 2010 and 2030 would not exceed the one-hour average or the eight-

hour average for NAAQS for CO at any location (see Table 1 and 2). Predicted maximum one-hour CO concentrations from vehicle emissions under the No Build Alternative ranged from 6.0 to 6.7 ppm for the year 2010 and from 5.2 to 6.0 ppm for the year 2030 (Table 1). These values are all below the one-hour average NAAQS of 35 ppm for CO. Predicted maximum eight-hour CO concentrations from vehicle emissions under the No Build Alternative ranged from 4.2 to 4.7 ppm for the year 2010 and from 3.6 to 4.2 ppm for the year 2030 (Table 5). These values are all below the eight-hour average NAAQS of 9 ppm for CO.

#### Mobile Source Air Toxics

For the Modified Alternative 5 and the no build alternative, the amount of MSATs emitted would be proportional to the vehicle miles traveled, or VMT, assuming that other variables such as fleet mix are the same for each alternative. Because the estimated VMT under the Modified Alternative 5 and the no build alternative are nearly the same, varying by less than 2 percent during the PM peak hour and 8 percent during the AM peak hour, it is expected there would be no appreciable difference in overall MSAT emissions among the alternatives. Also, regardless of the alternative chosen, emissions will likely be lower than present levels in the design year as a result of EPA's national control programs that are projected to reduce MSAT emissions by 57 to 87 percent from 2000 to 2020. Local conditions may differ from these national projections in terms of fleet mix and turnover, VMT growth rates, and local control measures. However, the magnitude of the EPA-projected reductions is so great (even after accounting for VMT growth) that MSAT emissions in the study area are likely to be lower in the future in virtually all locations.

Because of the specific characteristics of the project alternatives [i.e. new connector roadway], under each alternative there may be localized areas where VMT would increase, and other areas where VMT would decrease. Therefore it is possible that localized increases and decreases in MSAT emissions may occur. The localized increases in MSAT emissions for the Modified Alternative 5 would likely be most pronounced along the new SE Issaquah Bypass. However, even if these increases do occur, they too will be substantially reduced in the future due to implementation of EPA's vehicle and fuel regulations.

In sum, under the Modified Alternative 5 in the design year it is expected there would be reduced MSAT emissions in the immediate area of the project, relative to the No Build Alternative, due to the reduced VMT associated with more direct routing, and due to EPA's MSAT reduction programs. In comparing the no build to the Modified Alternative 5, MSAT levels could be higher in some locations than others, but current tools and science are not adequate to quantify them. However, on a regional basis, EPA's vehicle and fuel regulations, coupled with fleet turnover, will over time cause substantial reductions that, in almost all cases, will cause region-wide MSAT levels to be significantly lower than today.

## **Mitigation**

### Construction

Construction air quality mitigation for the Modified Alternative 5 are the same as those in Chapter 7 of the 2003 Draft Supplemental EIS Air Quality Appendix.

### Operational

Because no exceedence of NAAQS are predicted, no design or operational changes would be required.

## **Conformity Determination**

FHWA and WSDOT projects must comply with the project-level conformity criteria of the EPA Conformity Rule, and with WAC Chapter 173-420. Regionally significant projects must be included in a conforming Metropolitan Transportation Plan (MTP) and Transportation Improvement Plan (TIP) by the regional metropolitan planning organization (MPO). The Southeast Issaquah Bypass project is included in the latest version of the PSRC's MTP and TIP as project ISS-9. As stated in 40 Code of Federal Regulation (CFR) Part 93, the following criteria must be met when determining project conformity. A brief summary of the project's conformity to the State Implementation Plan (SIP) is discussed with each criterion (criteria are indicated by *italics*).

- *The conformity determination must be based on the latest planning assumptions.* The Southeast Issaquah Bypass project is included in the latest version of the PSRC's MTP and TIP as project ISS-9. The plans rely on the most current planning assumptions approved by the PSRC.
- *The conformity determination must be based on the latest emission estimation model available.* Emissions to determine conformity to the MTP and TIP were calculated using MOBILE 6.2, the emission model used to model conformity of the current Puget Sound Air Quality Maintenance Plans.
- *The project must come from a conforming transportation plan and program.* The Southeast Issaquah Bypass project is included in the latest version of the PSRC's MTP and TIP as project ISS-9.
- *There must be a current conforming plan and a current conforming TIP at the time of project approval.* There is a current conforming MTP and TIP.
- *The project must come from a conforming transportation plan and program.* The Southeast Issaquah Bypass project is included in the latest version of the PSRC's MTP and TIP as project ISS-9.
- *The FHWA project must not cause or contribute to any new localized CO or violation in CO and PM<sub>10</sub> nonattainment or maintenance areas.* The project is located in a CO maintenance area. As shown in Tables 4 and 5, under the project, no CO violations in the project area would occur in 2010 or 2030. The project area is in conformity for PM<sub>10</sub>.
- *The FHWA project must comply with PM<sub>10</sub> control measures in the applicable implementation plan.* The area is in conformity for PM<sub>10</sub>, so no implementation plan is required.

Conformity Finding: The project meets the criteria of 40 CFR Part 93 and WAC 173-420 for projects from a conforming plan and TIP. The project meets all of the hot-spot criteria of 40 CFR Part 93 and WAC 173-420-065. The project meets the conformity criteria of 40 CFR Part 93 and WAC 173-420 and conforms to the SIP.



## References

References are the same as those in the 2003 Draft Supplemental EIS Air Quality Appendix, with the additional reference below.

Puget Sound Regional Council, 2006. Transportation Improvement Program Appendix A Project Descriptions. Seattle, WA, March 2006.

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*Appendix F*

***Conceptual Wetland Mitigation Plan***



# Conceptual Mitigation Plan

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## Southeast Issaquah Bypass Project Concurrence Point 3

Revised  
December 31, 2005



Washington State  
Department of Transportation



U.S. Department of Transportation  
Federal Highway Administration



# SE Issaquah Bypass Conceptual Mitigation Plan

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- Appendix A. Wetland Classifications, Wetland Impacts, and Wetland Mitigation Requirements, Southeast Bypass Project, Issaquah, Washington (Herrera 2005).

# 1 Overview

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The purpose of the proposed SE Issaquah Bypass project is to create a new north/south arterial roadway between the new Sunset interchange on Interstate 90 (I-90) and Front Street South in Issaquah, Washington (Figure 1). The new roadway would relieve existing traffic congestion, increase the capacity of the local road network, improve the existing level of service consistent with the City of Issaquah Comprehensive Plan, provide an important new link in the regional roadway system, and promote multi-modal transportation options by including pedestrian, bicycle, and recreational trail connections.

The proposed project is identified as Alternative 5 (North C - South A) in the SE Bypass Supplemental Draft Environmental Impact Statement (SDEIS) that was published in June, 2004 (FHWA et al, 2004), as updated and described in detail in the Signatory Agency Committee (SAC) Concurrence Point 3 packet (FHWA et al, 2005).

This Conceptual Mitigation Plan is designed to identify mitigation to aquatic resources that is required to be documented in the FEIS and the Record of Decision. The level of detail is consistent with that in other analyses conducted for the FEIS. Project impacts were identified through extensive field investigations and study. The resulting mitigation concepts documented in this Plan will be refined and modified as appropriate as more detailed site information is obtained during final design. After the project proceeds to the implementation phase a Final Mitigation Plan will be prepared for project permitting. All changes to the project will follow the mitigation objectives described in this Plan, consistent with all regulatory requirements that will be subject to more detailed review during project permitting.

The proposed project has been designed to avoid and minimize wetland and stream impacts to the maximum extent practicable while meeting the project's purpose and need. This was achieved by bridging of the roadway over the North Tributary and Wetland GW and adjustment of the roadway alignment to avoid wetlands. The only wetland fill impact is filling of the 0.59-acre Wetland VL, a Category II wetland. Avoidance of that Wetland VL is not possible without causing a comparable size of impact to the higher quality Wetland GW or making the project alignment impractical. All wetland and buffer impacts will be mitigated through wetland and buffer creation and enhancement, using mitigation ratios recommended by the Department of Ecology that are applicable to wetland classes and functions.

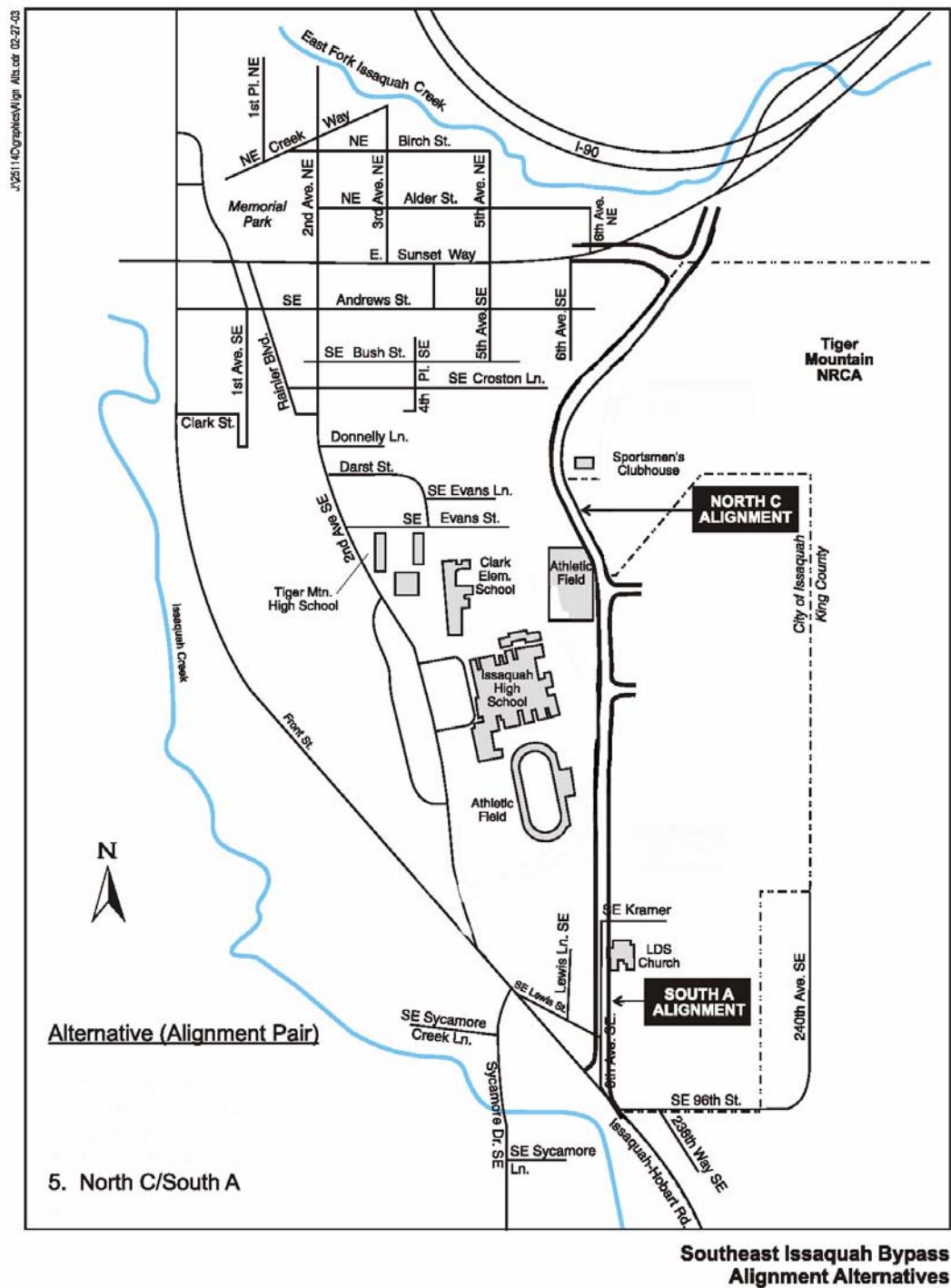
Stormwater mitigation will be designed to provide water quality treatment as well as detention and infiltration and to match the pre-developed hydrology and result in a no-net increase in pollutant loading to surface waters. All stormwater runoff from the project will be collected and treated in five stormwater ponds. Stormwater design will meet the requirements of the 2005 King County Surface Water Design Manual, the 2005 Ecology Stormwater Management Manual for Western Washington, or equivalent standards. With these standards, no impacts to wetland hydrology will occur. Enhanced stormwater treatment and phosphorus treatment will be provided, and stormwater detention design will be based on the flow-duration based flow control standard (King County Level 2 or equivalent) assuming forested pre-developed conditions. Treatment of stormwater from existing streets is also proposed, to further mitigate the impacts of the project and result in the no-net-increase in pollutant loadings to surface waters. Infiltration

will be provided to the extent practicable, to reduce impacts to the underlying aquifer and stream base flows to the maximum extent practicable.

The proposed project will result in no direct impacts to the North Tributary, the only significant stream along the entire project alignment. The proposed 270-foot bridge over the North Tributary will use 60-65 foot spans supported on piles, thereby avoiding direct impacts to the stream and wetland. Even though no impacts will result from the project, restoration of portions of the North Tributary downstream of the project is proposed as an added mitigation measure. This will supplement other voluntary (i.e., not mitigation related) wetland and stream restoration actions that the City of Issaquah has implemented in recent years along Issaquah Creek and is proposed for the lower North Tributary reach (also called Hope Creek) in 2006. Other small drainages that are present along the alignment, including one that outflows from Wetland GW that will be affected by a stormwater pond, will be preserved and incorporated into final mitigation plans as appropriate.

To further improve the water quality in Wetland GW as well as in the downstream waters, the project will include completing the installation of sanitary sewers in the South A area including the LDS church and homes on 6<sup>th</sup> Avenue SE and SE Kramer Place. The removal of the nutrients being discharged from existing septic tanks in this area, which have a history of poor performance due to high groundwater levels, will have a measurable benefit to downstream waters and is a significant additional mitigation measure.

**Figure 1 – Vicinity Map**



## 2 Project Description and Setting

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This Conceptual Mitigation Plan is based on a modification of Alternative 5 (North C - South A alignments) from the Draft Environmental Impact Statement (DEIS) (FHWA et al, 2000), and is shown in Figure 2. The modification to Alternative 5 entails a slight shift of the roadway alignment along 6<sup>th</sup> Avenue SE to the west to avoid impacting Wetland GW. The resulting Alternative 5 Modified was selected by the City Council as the preferred alternative after considering all alignments that were identified and evaluated in the DEIS and the subsequent SDEIS (FHWA et al, 2004). The Concurrence Point 3 packet further describes the rationale for selecting Alternative 5 as the preferred alternative and provides additional details on the proposed road alignment and the analysis of impacts and mitigation (FHWA et al, 2005).

The North C alignment begins at the I-90 Sunset Interchange and proceeds southward along a former railroad grade. The first part of the route is on fill followed by a cut section near the Issaquah Sportsmen Club and continuing in a shallow cut to just past the Issaquah High School softball field. No wildlife crossings are proposed along the North C alignment because it is adjacent to fully developed residential areas. The South A alignment begins at a point south of the high school softball fields and continues over the North Tributary of Issaquah Creek. In this section the roadway reaches grade and stays essentially at grade for the rest of the project. The North Tributary will be crossed by a bridge that will be designed to permit wildlife passage. This bridge will have a height of 5-6 feet to allow local wildlife to move freely within the Wetland GW area. After crossing the North Tributary the alignment shifts slightly westward to avoid Wetland GW and follows the existing 6<sup>th</sup> Avenue SE to an intersection with Front Street/Hobart Road, the end of the project.

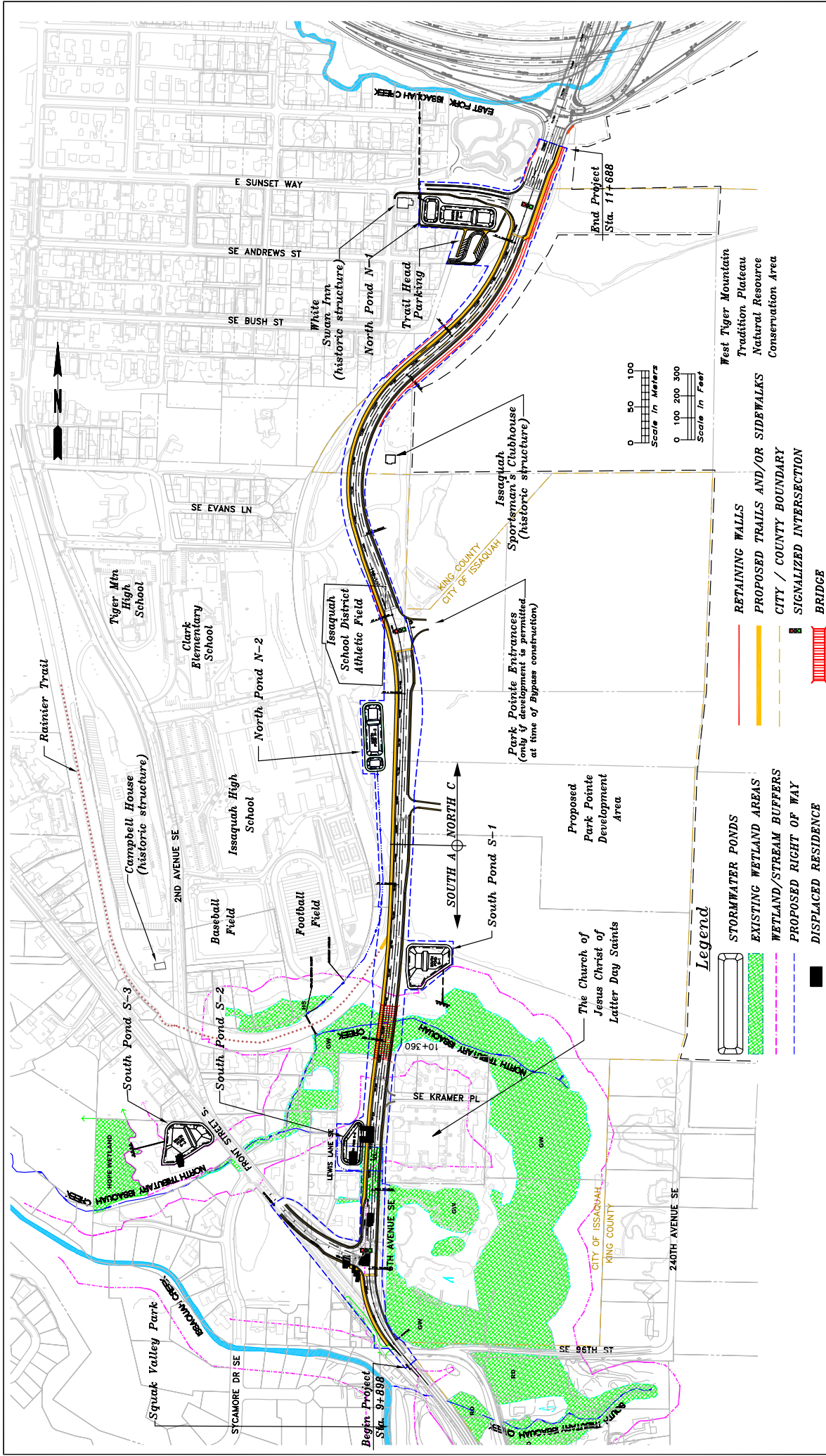


Figure 2. Alternative 5 Modified (North C and South A)





## **3 Summary of Stream Impacts**

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### **3.1 Stream Descriptions**

The proposed project is located within the Issaquah Creek basin, which is in the Lake Washington/Cedar/Sammamish watershed (Water Resource Inventory Area 8).

The only significant stream located within the project limits is the North Tributary (also known as Lewis Lane Tributary and Hope Creek). This stream outflows from Wetland GW, which is fed by springs and seeps along lower Tiger Mountain. This tributary has a channel approximately two to three feet wide and six inches deep. The stream's substrate is mainly silt and sand. The banks of the tributary are well vegetated with native and invasive species. Whereas North Tributary historically discharged directly to Issaquah Creek, at a location west of Front Street and about 2000 feet downstream of the project, the stream currently discharges into a large, 60-acre wetland complex. Physical barriers between the wetland complex and Issaquah Creek, including man-made fill created in the 1960's and beaver dams, present an effective barrier to fish passage except during flooding conditions. Upstream of the wetland complex there does not appear to be any passage issues, except perhaps with thick reed canary grass mats that grow in the stream. A log weir observed in the stream downstream of the Front Street culvert and a small rock dam on private property upstream of Front Street appears to be fish passable.

A small drainage exists along 6<sup>th</sup> Avenue SE just south of the LDS church and conveys a portion of the Wetland GW outflow (beginning at a culvert under 6<sup>th</sup> Avenue SE) through the single family homes before discharging to the North Tributary. The pathway of this drainage, which was man-made to aid in draining local lots, is in the area of the proposed South Pond S-2. A second culvert at the south end of 6<sup>th</sup> Avenue SE drains the southwest corner of Wetland GW, and that culvert follows Front Street until it discharges into the North Tributary.

East Fork of Issaquah Creek is located near the northern limits of the project, but outside the project limits. Stormwater from North Pond N-1 will discharge to this stream.

### **3.2 Existing Stream Resources**

Fish present in the North Tributary stream include cutthroat trout and other resident fish. Juvenile Chinook salmon possibly access the North Tributary as refuge during large flood events on Issaquah Creek, but in all other times physical barriers prevent passage of fish from Issaquah Creek to the North Tributary. The City is proposing removal of the blockage, caused by filling from past land use activities, as part of the Hope Creek restoration project. If fish-passable, the North Tributary will likely support juvenile coho, kokanee, steelhead, and other species common to small streams. Salmonid species have been documented using Issaquah Creek and East Fork Issaquah Creek for migration, spawning, and rearing.

According to the City of Issaquah rating system – Chapter 18.10.780 – the North Tributary is considered a Class 2S Stream and would require a 100-foot buffer as it is used by salmonids.

The riparian zones adjacent to the streams and the wetland and forested areas provide habitat for a number of fish, avian and terrestrial animal species, and numerous plant species.

The City of Issaquah and a local land owner are proposing the Hope Creek Restoration Project to improve fish passage between Issaquah Creek and the large wetland complex on lower North Tributary, as well as mitigate flooding problems created when the stream was blocked by filling activities in the 1960's. This project is currently proposed for construction in 2006. The City owns or is acquiring much of the stream riparian corridor west of Front Street where work will be undertaken to remove some of these barriers, and has conducted restoration work on Issaquah Creek during recent years (including additional restoration in 2006). These activities will significantly improve the fisheries potential of the North Tributary.

### **3.3 Stream Impacts**

The proposed project will result in no direct in-stream impacts to the North Tributary, the only significant stream within the project limits. A bridge will span the North Tributary, and pier supports for the bridge will be 30 feet from the edge of ordinary high water. The project will also not disrupt the movement of flow on the North Tributary or out of Wetland GW. Approximately 0.31 acres of stream buffer (which is also Wetland GW) will be impacted by the bridge through shading.

A small man-made drainage that runs from Wetland GW to the North Tributary, in the area across 6<sup>th</sup> Avenue SE from the LDS church, will be impacted by South Pond S-2. This tributary, which is relatively degraded, will be rerouted around the pond. Mitigation of this drainage, including enhancements, would be done because it is a regulated stream under City code. The other culverted outflow from Wetland GW, at the south end of 6<sup>th</sup> Avenue SE, will also be evaluated to determine whether it can be daylighted and joined with the other drainage near the LDS church.

Stormwater runoff from the project will be collected and treated at four onsite stormwater facilities, plus at an offsite facility (South Pond S-3). Approximately 12.86 acres of new impervious surface area will be created. However, about 2.14 acres of existing pollution generating impervious areas will be replaced by the new roadway and 3.29 acres of offsite roadway (Front Street South and 2<sup>nd</sup> Avenue SE) that now discharges undetained and untreated to the North Tributary will be intercepted for detention and treatment at South Pond S-3.

A review of the geology of the project area around Wetland GW indicates that groundwater movement to the wetland is primarily from the high ground to the east and out through the North Tributary and existing culverts under 6<sup>th</sup> Avenue SE. The roadway is anticipated to have no discernable impact on these wetlands and resulting stream flow into the North Tributary, and all existing drainage patterns will be preserved.

### **3.4 Floodplain Impacts**

The project corridor along 6<sup>th</sup> Avenue SE is located in the designated 100-year flood plain. This floodplain delineation is based on the 2002 Issaquah Creek Flood Insurance Study and associated FEMA Flood Insurance Rate Maps that became effective April 19, 2005. This area of the Issaquah Creek floodplain, east of Front Street, is flooded by Issaquah Creek mostly via flood

waters backing up on the North Tributary. Therefore, the area does not provide any conveyance for floodwaters on Issaquah Creek.

The proposed SE Bypass bridge over the North Tributary will span the area of deepest floodwaters. South of the bridge, where flood depths are shallow, the roadway may be raised by 1-2 feet to facilitate stormwater drainage, and, possibly, to raise it above the 100-year flood level. However, since Front Street South at the SE Bypass connection is already in the 100-year floodplain, raising the SE Bypass may not result in any additional flood protection benefit. If the SE Bypass roadway is raised, this could result in a loss of up to 84,000 cubic feet (2 acre/foot) of flood storage. As discussed in Section 5.6, this floodplain impact will be fully compensated in accordance with the City's Flood Hazard Ordinance.

## 4 Summary of Wetland Impacts

### 4.1 Wetland Descriptions

Two wetlands are located within the project limits (Figure 3). These wetlands are located along the southern portion of the project, along the South A alignment, and include the 26.6-acre Category II Wetland GW and the 0.59-acre Category II Wetland VL. A third wetland, the Hope Property wetland, is part of a large regional wetland complex and is located near (but is not impacted by) stormwater South Pond S-3. The Hope wetland was delineated to avoid being impacted by the proposed pond.

Wetlands in the project area were previously delineated in June and December of 1997 and the findings, including wetland ratings were presented in a report entitled *Jurisdictional Wetland Delineation Draft Technical Report* (Herrera, 2000). In response to the revised South A alignment and review by agency staff during the SAC process (summarized in FHWA et al, 2005), a restudy of wetlands was conducted to confirm wetland characteristics, recalculate wetland and buffer impacts under the new alignment, and update the proposed wetland mitigation (Herrera, 2005). Wetland ratings in the project area were evaluated in accordance with the Washington State Department of Ecology (Ecology) 2004 Washington State Rating System for Western Washington, and the City of Issaquah Critical Area Ordinance rating system. The updated wetland report is included as Appendix A.

### 4.2 Existing Wetland Resources

Table 4-1 summarizes the characteristics of wetland located in the vicinity of the project limits.

**Table 4-1. Summary of Wetlands Resources in Project Vicinity**

Wetland Name	Size (acres)	Cowardin Class <sup>a</sup>	Ecology Category <sup>b</sup>	City of Issaquah Class <sup>c</sup>
GW	26.6	PFO/PSS/PEM	II	1
VL	0.59	PSS	II	3
Hope	60+	PFO/PEM	II	1

<sup>a</sup>Based on Cowardin et al. (1979): palustrine forested (PFO), palustrine scrubshrub (PSS), and palustrine emergent (PEM).

<sup>b</sup>Ecology classification of wetlands is based on Hruby (2004).

<sup>c</sup>City of Issaquah classification of wetlands is based on Chapter 18.10.590 of the municipal code.

Additional descriptions of these wetlands are documented in Herrera (2005).

### 4.3 Permanent Wetland and Buffer Impacts

A summary of permanent wetland impacts is provided in Table 4-2. Two wetland impacts are associated with the proposed project, in Wetland VL and Wetland GW.

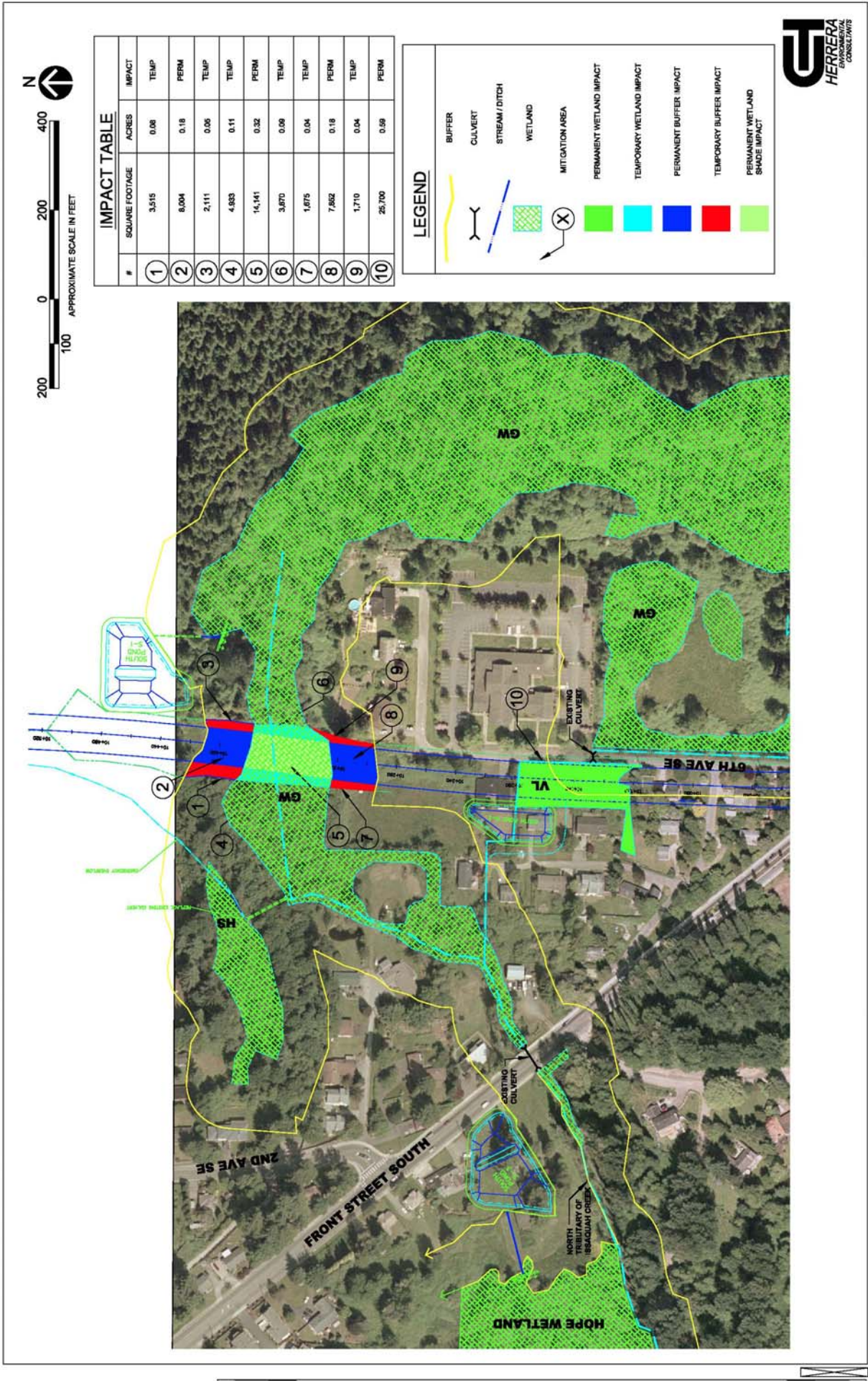


Figure 3. Temporary and Permanent Wetland and Buffer Impacts

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**Table 4-2. Summary of Permanent Wetland and Buffer Impacts**

Wetland Name	Permanent Impacts	
	Wetland (acres)	Buffer (acres)
VL	(fill) 0.59	–
GW	(shade) 0.32	0.36
Total	0.91	0.36

In Wetland VL, a Category II wetland located on undeveloped single family parcels, 0.59 acres of wetland fill will occur. In Wetland GW, 0.32 acres of shading will occur due to the bridge over the North Tributary. Within the buffer of Wetland GW, 0.36 acres of permanent buffer impacts will also occur. It is noted that previous reports showed the Wetland VL impact at 0.40 acres in size, but has been revised to 0.59 acres because the previous wetland delineation map had an error in the wetland boundary that was detected during the CP3 review.

Since the bridge will be constructed on pilings, only very minor filling will occur within Wetland GW. Mitigation of the impact from the pilings is not required, because fill caused by bridge pilings that are constructed to avoid wetlands is not considered fill by the U.S. Army Corps of Engineers.

#### **4.4 Temporary Wetland and Buffer Impacts**

A summary of temporary wetland impacts is provided in Table 4-3.

**Table 4-3. Summary of Temporary Wetland and Buffer Impacts**

Wetland Name	Temporary Impacts	
	Wetland (acres)	Buffer (acres)
VL	–	–
GW	0.20	0.21
Total	0.20	0.21

A temporary impact to Wetland GW in the amount of 0.20 acres will occur. Within the buffer of Wetland GW, 0.21 acre of temporary buffer impacts will also occur. These temporary wetland and buffer impacts are caused by bridge construction over the North Tributary, which is a project mitigation feature whose primary purpose is to avoid wetland fill.



## 4.5 Plant Communities and Habitats

Plant communities and habitats in area wetlands include emergent, scrub-shrub, and forested wetlands.

The south end of the project is dominated by Wetland GW. Wetland GW is located at the base of Tiger Mountain, east of Front Street and includes two areas delineated in 1997 as separate wetlands (Wetland HS and the eastern portion of Wetland RD). The source of water for Wetland GW is ground water seeps and springs along the base of Tiger Mountain. Wetland GW is approximately 26.6 acres in size. Wetland GW is a depressional outflow wetland containing three major plant communities including mixed forest, scrub-shrub, and clearings dominated by emergent species. These communities contain many native species including western red cedar, red alder, salmonberry, lady fern, and skunk cabbage.

Wetland VL is located adjacent to and north of 6<sup>th</sup> Avenue SE and is 0.59 acres in size. The source of water for Wetland VL is ground water and surface runoff. Wetland VL is a depressional outflow wetland containing one major plant community, scrub-shrub, dominated by Sitka willow and red-osier dogwood. Wetland VL is surrounded by single family homes and asphalt roadway along 6<sup>th</sup> Avenue SE.

The 4.4-acre Hope property, where stormwater Pond South S-3 is proposed, contains a portion of a large wetland complex (approximately 60 acres) that is located on the northeast bank of Issaquah Creek. The Hope property wetland is a riverine wetland that extends offsite westward to Issaquah Creek. The wetland contains two major plant communities including forest dominated by red alder and an emergent community dominated by invasive reed canarygrass. The project does not impact this wetland.

## 4.6 Cowardin Classification and Wetland Category Ratings

The Cowardin classification (Cowardin et al., 1979) and the Washington State Department of Ecology wetland classification (Hruby, 2004) for wetlands in the project limits are shown in Table 4-1. The wetland impacts by Cowardin class are summarized in Table 4-5. All impacted wetlands are palustrine scrubshrub (PSS), which is the dominant plant community along the northern edge of Wetland GW and is associated with the North Tributary. Wetland VL is also a palustrine scrubshrub wetland.

**Table 4-4. Wetland Impacts by Cowardin Class**

Cowardin Class	Name	Permanent Wetland Fill (acres)	Permanent Wetland Shading (acres)	Temporary Wetland Impact (acres)
PSS	palustrine scrubshrub	0.59	0.32	0.20

#### **4.7 Wetland Functions Impacted**

The functions and values provided by wetlands in the project area were evaluated in order to determine the appropriate level of mitigation required to compensate for temporary and permanent wetland and wetland buffer impacts (Herrera, 2005). A score between 1 and 3 is considered low performance, a score between 4 and 6 is considered moderate, and a score between 7 and 10 is considered high.

Table 4-4 summarizes the functional assessment for wetlands impacted by the project. Wetland GW and Wetland VL were rated together as one functional assessment unit since there is a level surface water connection between the two wetlands via a culvert. Wetland GW and Wetland VL have moderate performance scores for most of the functions assessed. High performance scores include potential for reducing/decreasing downstream erosion, potential for ground water recharge, habitat suitability for anadromous fish, and habitat suitability for resident fish.

**Table 4-5. Wetland functions assessment scores for Wetland GW and Wetland VL**

Wetland Function	Wetland GW and Wetland VL Score <sup>a</sup>
Potential for removing sediment	6 (M)
Potential for removing nutrients	5 (M)
Potential for toxic metals and organic compounds	5 (M)
Potential for reducing peak flows	6 (M)
Potential for reducing/decreasing downstream erosion	8 (H)
Potential for ground water recharge	7 (H)
General habitat suitability	6 (M)
Habitat suitability for invertebrates	6 (M)
Habitat suitability for amphibians	6 (M)
Habitat suitability for anadromous fish	7 (H)
Habitat suitability for resident fish	7 (H)
Habitat suitability for wetland-associated birds	4 (M)
Habitat suitability for wetland-associated mammals	5 (M)
Native plant richness	6 (M)

<sup>a</sup> "M" and "H" refer to moderate and high level of performance.

## **5 Proposed Compensatory Stream Mitigation**

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### **5.1 Overview**

Maintenance of all natural drainage patterns in the project limits is a project goal, as required by local stormwater and critical area regulations, and any impacts will be fully mitigated.

Impacts of the proposed project to area streams are minor, limited to relocation of a small local drainage due to construction of South Pond S-2. Potential impacts to the only significant stream in the project limits – the North Tributary – will be avoided by bridging over the stream with a long-span bridge. Impacts from stormwater are mitigated by the using the highest level of stormwater detention (flow duration control to match forested conditions) and water quality treatment (enhanced phosphorus control). Floodplain impacts will also be mitigated.

Additional stream mitigation will also be conducted, beyond that required to mitigate direct project impacts. This includes stream habitat enhancements on the North Tributary downstream of Front Street and installation of sewers on 6<sup>th</sup> Avenue SE and SE Kramer Place to eliminate existing septic systems in the area that contribute to water quality problems in local streams.

### **5.2 Rationale for Stream Mitigation Site Selection**

Mitigation of stream impacts will be conducted onsite, for relocation of the small drainage across 6<sup>th</sup> Avenue SE from the LDS church, and offsite on lower North Tributary. The stream habitat enhancements on lower North Tributary will be performed in conjunction with stream buffer enhancements that are proposed for mitigating shading impacts to Wetland GW (see Section 6.5). These mitigation sites will be on property owned by the City of Issaquah, allowing full control of restoration design at those locations without the issue of private property ownership (which, in the City's experience, can be very difficult). The North Tributary upstream of Front Street is located on private property and has much less fisheries restoration potential than downstream areas, and therefore no restoration is proposed upstream of Front Street.

### **5.3 Stream Mitigation Goals and Objectives**

Goals and objectives define the overall vision and specific steps, respectively, for successfully implementing a particular activity or project.

For this project, the goal is to develop compensatory mitigation to offset project impacts to stream resources, to meet or exceed functions that are being impacted. Specific objectives that have been identified to achieve that goal are identified below. Since the impact to stream resources is relatively minor, these objectives can be achieved relatively easily.

- Replace identified unavoidable impacts to stream channels, stream buffers, and their aquatic habitat functions. For the proposed project, this includes relocation of the small drainage between Wetland GW and the North Tributary that is impacted by South Pond A-2, which is currently degraded but can be improved significantly through mitigation actions.

- Include enhancements for fish and riparian habitat in stream and stream buffer restoration projects that are appropriate and effective for the site and intended habitat use. Standard restoration concepts such as providing for fish passage, rearing habitat and refuge, in-stream structure, large woody debris, desired plant community establishment, and other important habitat functions shall be employed in the design of such mitigation.
- For unquantifiable unavoidable impacts to stream channels, stream buffers, and their aquatic habitat functions, offer additional mitigations that, when compared to potential project impacts, results in a clearly net positive compensatory benefit for the project. For the proposed project, this includes habitat restoration of lower North Tributary and installation of sewers in the neighborhood east of Front Street.
- Maintain flood protection levels consistent with or improved from existing conditions. The design of the project and stream mitigation should not result in worsening flood conditions. However, the project is not designed to significantly improve or eliminate flooding in the area.
- Ensure success of restoration projects through monitoring and maintenance for a period of five years following construction. Establish quantitative goals for plant survival and cover, channel stability, invasive vegetation control, irrigation, documentation, and post-construction project funding.

#### **5.4 Conceptual Stream Mitigation Plan**

A small drainage located across 6<sup>th</sup> Avenue SE from the LDS church will be impacted by the construction of South Pond S-2. To mitigate that impact, the drainage will be relocated and improved. The exact plans for this drainage relocation will be addressed during final design and this information will be included in permit applications.

No other impacts to streams will result from the proposed project. However, the project proposes, as additional mitigation to compensate for project impacts, to restore habitat along 400-500 feet of the North Tributary west of Front Street, adjacent to the Hope property that the City plans to acquire (see Figure 4 in Section 6). Stream habitat restoration would include installation of large woody debris, spawning gravel placement and other instream improvements to supplement the invasive vegetation removal and riparian vegetation planting that will be conducted for the wetland mitigation. Further downstream, but separate from the SE Bypass project, the City is planning to construct the Hope Creek (North Tributary) Restoration Project in 2006 to eliminate the fish passage blockage between the North Tributary and Issaquah Creek and enhance juvenile salmon rearing areas within the wetland complex. This will significantly enhance the success of the SE Bypass mitigation by allowing anadromous fish to access the restoration area.

To further improve the water quality in Wetland GW as well as in the downstream waters, the project proposes to complete the installation of sanitary sewers in the South A area including the LDS church and the remaining homes on 6<sup>th</sup> Avenue SE and SE Kramer Place. None of the sewer work should have an impact on Wetland GW or the North Tributary because work would be conducted on existing streets and strict erosion and sediment control practices will be followed during construction. The removal of the nutrients being discharged from the existing

septic tanks will have a measurable benefit for down stream waters and is a significant mitigation measure.

## **5.5 Stormwater Mitigation**

Five separate stormwater detention and treatment facilities are proposed to provide detention and treatment for runoff emanating from the project site (Figure 2). Preliminary sizing of these facilities were based on stormwater modeling using Ecology's *Western Washington Hydraulic Model, Version 2*. Adequate land area exists at the proposed stormwater facility sites to accommodate the ponds.

As was assumed in the SDEIS, all project stormwater detention facilities will be designed to meet the requirements of the *King County Surface Water Design Manual*, or equivalent requirements from the Washington State Department of Ecology's *Stormwater Management Manual for Western Washington*. These manuals require that detention pond outflows shall meet the pre-developed, forested runoff rates for peak flows and durations between ½ of the 2-year storm through the 50-year storm, based on forested pre-developed conditions.

Infiltration will be incorporated into the detention pond design where feasible. At a minimum, infiltration is expected at North Pond N-2. As described in the revised stormwater analysis, (Attachment C to the CP3 document), under this scenario the entire project could result in a 17.6 acre-foot decrease in recharge water volume relative to current conditions, which is equivalent to 0.1% (or 1/1000) of the annual Lower Issaquah Valley aquifer flow. This could result in up to a 0.024 cfs decrease in flows in lower Issaquah Creek, or about 0.16% of the summer low flow. If favorable site conditions are found during detailed field studies conducted during final project design, infiltration will also be provided at North Pond N-1 and South Pond S-1. This additional infiltration would result in no decrease in aquifer recharge or stream base flows.

Water quality treatment will be provided for project site runoff in accordance with the stormwater manual requirements. Flows will be treated up to the water quality design storm, which is equivalent to treating 91% of the total average annual runoff volume (per the Ecology manual). For stormwater discharges to surface waters, enhanced treatment and phosphorus treatment will be provided. Runoff from approximately 151% of the project's new pollution generating impervious area will be treated, compensating for the less-than-100% efficiency of stormwater treatment BMPs. With stormwater infiltration occurring only at North Pond N-2, a no net increase in pollutant loading to area streams will occur for those contaminants that aquatic resources are particularly sensitive to, including metals and suspended sediment. With reduced nutrient loadings resulting from sewerage of 6<sup>th</sup> Avenue SE and SE Kramer Place, all pollutant loadings - metals, sediment and nutrients - should decrease relative to current conditions. Under the alternate scenario with stormwater infiltration also provided at North Pond N-1 and South Pond S-2, pollutant loadings should decrease even further. Additional information on the stormwater evaluation can be found in Attachment C of the CP3 document (FHWA et al, 2005).

The following describes each of the five stormwater facilities:

### **North Pond N-1**

North Pond N-1 is assumed to function as a large wet detention pond with enhanced water quality treatment, but is also evaluated as an infiltration facility in the alternate scenario. If field testing during project design confirms favorable conditions, North Pond N-1 will be designed to maximize infiltration. In addition to further evaluating infiltration at North Pond N-1, the feasibility of using linear infiltration along the roadway where retaining walls are not proposed will also be evaluated during design. North Pond 1 will discharge to a new outfall on the south bank of East Fork Issaquah Creek.

### **North Pond N-2**

North Pond N-2 is assumed to function as a detention pond with infiltration to groundwater. In the SDEIS a design infiltration rate of 5"/hour was assumed. Very favorable soil conditions are present at this location for infiltrating stormwater. As much roadway runoff as possible, given the topography, will be directed to this pond. North Pond 2 will discharge its overflow, when the rainfall rate exceeds the design infiltration rate, to an open grass lined ditch that will convey the stormwater to a wetland located immediately south of the Issaquah High School Football Field (Wetland HS). This wetland in turn is drained by a culvert under the old railroad grade that is connected to the North Tributary of Issaquah Creek that drains to the main stem of Issaquah Creek.

### **South Pond S-1**

South Pond S-1 is assumed to function as a large wet detention pond with enhanced water quality treatment, but is also evaluated as an infiltration facility in the alternate scenario. During design this site will be subjected to detailed infiltration and groundwater testing to verify its infiltration potential. If found to be favorable, South Pond S-1 will be designed to maximize infiltration of site runoff routed to it. South Pond S-1 will discharge to a level spreader that will disperse the flow into the North Tributary of Issaquah Creek wetland, immediately south of Pond S-1. The flow will then follow the North Tributary to the main stem of Issaquah Creek.

### **South Pond S-2**

South Pond S-2 will be designed as a water quality pond with enhanced treatment for project runoff originating from between South Pond S-1 and Front Street. Due to its location in the 100-year floodplain, detaining stormwater may not be effective because the pond would be inundated by flooding from Issaquah Creek at about the 10-year recurrence interval flood. To provide the necessary amount of stormwater mitigation for this segment of the project, offsite detention will be provided at South Pond S-3. Infiltration is not proposed at this pond site due to poor soils and shallow groundwater in this area. Depending on site conditions and the final configuration of the facility, stormwater from South Pond S-2 will either discharge into the buffer of Wetland GW using a level spreader or to the North Tributary using a culvert outfall.

### **South Pond S-3**

South Pond S-3 is assumed to function as a large wet detention pond with enhanced water quality treatment. This pond will provide compensatory (offsite) detention for project site runoff entering South Pond S-2, which (as explained above) cannot achieve full detention capacity due to its location in the Issaquah Creek floodplain. South Pond S-3 will also provide water quality treatment for offsite runoff coming from South Front Street and 2<sup>nd</sup> Avenue. This site has not been tested for its infiltration potential, but is assumed to be poor due to shallow groundwater and fine grained floodplain soils. South Pond S-3 will discharge to the North Tributary using either a level spreader that will disperse the flow along the stream bank or a culvert outfall.

## **5.6 Floodplain Mitigation**

The project area in the vicinity of 6<sup>th</sup> Avenue SE is located within the 100-year flood plain. The predicted 100-year flood elevation is up to 1-2 feet deep in the project limits. The South A portion of the Southeast Issaquah Bypass may need to be raised above current ground levels to facilitate stormwater drainage from the roadway and possibly for flood protection. This could result in the loss of up to 84,000 cubic feet (2 acre/foot) of flood storage.

This floodplain impact will be fully compensated, in accordance with the City's Flood Hazard Ordinance, on the properties acquired along 6<sup>th</sup> Avenue SE and on the Hope property to be acquired by the City across Front Street. The Southeast Issaquah Bypass project should have no effect on the flood levels in the south project area, nor would it adversely affect flood flow patterns because the North Tributary will be bridged.

## **5.7 Stream Reference Sites**

Restoration activities along streams and stream buffers will be based on the success of several restoration projects conducted in Issaquah over the last few years. These projects include the Tibbetts Creek Greenway Project, the Hope Creek Restoration Project (in process), the Kees Creek Culvert Replacement project, and Sycamore Area Stream Improvement Project. City of Issaquah staff have gained extensive experience with proven restoration and planting techniques through the implementation and maintenance of these projects, and will contribute to the project mitigation design effort.

## **5.8 Recommendations for Future Stream Design**

Additional site-specific information is required before restoration designs can be prepared. However, since the projects are fairly minor in scope and are similar to other projects that have been constructed in the City during the last few years, no issues are foreseen at this time.

## 6 Proposed Compensatory Wetland Mitigation

### 6.1 Rationale for Wetland Mitigation Site Selection

Two potential wetland mitigation sites that are located in the vicinity of the project can be effectively utilized for wetland and wetland buffer mitigation. These two options, which are described in detail below, are considered on-site mitigation because they are in close proximity to the project site and wetland impacts.

### 6.2 Wetland Mitigation Ratios

Table 6-1 lists the current guidelines and requirements for wetland mitigation ratios and buffer widths. The wetland categories for Ecology do not directly correspond to the classes under the City Issaquah critical areas ordinance.

**Table 6-1. Applicable Wetland Mitigation Ratios**

Ecology Recommended			City of Issaquah Required		
Ecology Wetland Category <sup>a</sup>	Range of Mitigation Ratios	Buffer Width <sup>b</sup> (feet)	Issaquah Wetland Class <sup>c</sup>	Mitigation Ratio	Buffer Width <sup>d</sup> (feet)
I	4:1 to 24:1	200-300	1	2:1	100
II	2:1 to 12:1	100-200	2	2:1	100
III	2:1	50-100	3	1:1	25

<sup>a</sup>Ecology recommended classification of wetlands from Draft Hruby (2004). The smaller ratio is for creation and the higher ratio is for enhancement, with rehabilitation and combinations of creation, and enhancement in between.

<sup>b</sup>Ecology recommended buffer widths based on Ecology (2004).

<sup>c</sup>City of Issaquah classification of wetlands is based on Chapter 18.10.590 of the municipal code.

<sup>d</sup>City of Issaquah required buffers are based on Chapter 18.16.630 of the municipal code.

It should be noted that wetland mitigation ratios being agreed to are being agreed to by the City of Issaquah. The mitigation ratios shown in Table 6-1 for this project exceed what is required by WSDOT's 1993 Wetland Implementation Agreement with Ecology (WSDOT 1993). The City agreeing to these ratios does not constitute an endorsement by WSDOT or FHWA that these same ratios will apply to future WSDOT projects. WSDOT will continue to coordinate and cooperate with the Department of Ecology and others to finalize the "Draft Guidance on Wetland Mitigation in Washington State, Ecology Publication 04-06-013a" (Ecology 2004) that will be used in the future to guide appropriate wetland mitigation ratios for WSDOT projects.

### 6.3 Wetland Mitigation Goals and Objectives

Mitigation for temporary and permanent impacts to wetlands and wetland buffers will strive to meet several goals. Mitigation will re-establish palustrine forested communities. Wetland buffer will be enhanced to replace lost wetland buffer. The North Tributary to Issaquah Creek will be enhanced adjacent to the Hope Property to replace wetland functions permanently lost upstream due to shading caused by a proposed bridge over Wetland GW. Mitigation will replace wetland functions lost as a result of the proposed project. Wetland acreage lost due to permanent impacts



resulting from the project will be replaced. Wetlands and wetland buffers temporarily impacted by the project will be replanted and restored.

The primary goal of the project is to avoid and minimize impacts to wetlands and their buffers. Impacts that are unavoidable will be mitigated. Goals and objectives for wetland mitigation for the proposed project are presented below. In the final mitigation plan, these goals and objectives will be refined and performance standards will be developed.

The goals of the SE Bypass wetland mitigation are to:

- Replace lost wetland area and functions of impacted wetland that are proposed to be filled.
- Replace lost buffer areas that are proposed to be impacted, both temporarily and permanently..

The objectives of the SE Bypass wetland mitigation include:

- Replace unavoidable impacts to wetland area to ensure no net loss of wetland area. Filled wetlands shall be compensated by creating new wetlands that are lost due to project impacts, in an amount equal to the wetland loss multiplied by a mitigation ratio that is applicable to the wetland rating.
- Replace unavoidable impacts to wetland functions. Filled wetlands shall be compensated by creating new wetlands with equal or better function than that lost due to project impacts.
- Replace unavoidable impacts to wetland buffers. Impacted wetland buffers shall be compensated by replacement with new buffers having equal or better area and function.
- Mitigate for temporary impacts to wetlands and wetland buffers. Wetlands and buffers that are disturbed by construction activities shall be mitigated through restoration and replanting of the disturbed area.
- Reestablish appropriate native vegetation communities and processes. Habitat functions can be maximized by selecting native vegetation that is appropriate to the site conditions and natural processes.
- Maintain or provide for appropriate hydrology for wetland and buffer creation and enhancements.
- Maintain flood protection. Mitigation designs should not result in increased flood impacts to neighboring properties.

#### **6.4 Pre-Construction Description of Mitigation Site and Ecological Setting**

Wetland and wetland buffer mitigation sites are located within areas that are zoned low-density residential. Surrounding land use includes the large Wetland GW, other single-family homes, the LDS church, undeveloped park land, and the Issaquah Creek buffer. City of Issaquah land use regulations allow restoration activities to occur in these zoning classifications.

The Option 1 mitigation site is located immediately adjacent to Wetland GW, and the Option 2 site is located adjacent to Issaquah Creek. These locations will provide excellent connectivity between the proposed wetland creation areas and existing wetlands and streams. Existing vegetation in these areas is typical for urban areas, with moderate to poor coverage by native vegetation and presence of invasive vegetation species, such as reed canarygrass in wetlands, Himalayan blackberry in buffers, and Japanese knotweed along stream banks. These invasive species are very common in the area and their control will be specifically addressed in the restoration designs.

Soils and hydrologic conditions should be very favorable for wetland creation, wetland buffer replacement and wetland buffer enhancement. Soils at Wetland GW are identified as Oridia silt loam, which should also be present at the mitigation site. Soil excavation will be required at the wetland creation site to remove fill and lower the ground surface to the elevation of the adjacent Wetland GW, thereby exposing native hydric soils and providing high groundwater conditions that create favorable hydrology for wetland creation.

## 6.5 Conceptual Wetland Mitigation Plan

Table 6-2 summarizes proposed mitigation for both permanent and temporary impacts to wetlands and buffers. Figures 4 and 5 illustrate the two optional conceptual wetland mitigation designs to satisfy the project mitigation requirements. These figures show mitigation acreages that exceed the minimum required mitigation shown in Table 4, to provide a factor of safety at this stage in the mitigation design process. All proposed mitigation ratios meet City of Issaquah Critical Areas Ordinance requirements and exceed what is required by WSDOT's 1993 Wetland Implementation Agreement with Ecology (WSDOT 1993). The mitigation ratios proposed for this project follow draft Ecology criteria shown in Table 6-1.

**Table 6-2. Summary of Proposed Wetland and Wetland Buffer Mitigation**

Impact	Area Impacted (acres)	Compensation Ratio	Mitigation Description	Location on Figures	
				Mitigation Option 1	Mitigation Option 2
Permanent wetland fill – VL	0.59	3:1	1.77 acres of wetland re-establishment as part of Option 1 or Option 2. Existing wetlands would be enhanced in conjunction with wetland re-establishment under both options.	2 and 3 (Figure 4)	7 and 8 (Figure 5)
Shade impacts – GW	0.32	3:1	0.96 acres of riparian habitat enhancement.	6 (Figure 4)	6 (Figure 4)
Permanent buffer loss – GW	0.36	1:1	0.36 acres of replaced buffer area.	1 (Figure 4)	9 (Figure 5)
Temporary wetland and buffer disturbance	0.41	1:1	0.41 acres of wetland and buffer restored and replanted.	4 (Figure 4)	5 (Figure 5)

## **Compensation for Permanent Wetland Fill Impacts**

Under both options identified in the conceptual mitigation plan (described below), 0.59 acres of permanent impact to Wetland VL would be mitigated at a 3-to-1 ratio, by re-establishing a minimum of 1.77 acres of wetlands. This mitigation ratio is recommended by Ecology (2004) for Category II wetlands, and exceeds both the WSDOT (1993) 2-to-1 mitigation requirement for Category II wetlands and the City of Issaquah's 1-to-1 replacement ratio requirement for Class 3 wetlands.

Additional mitigation in conjunction with wetland re-establishment may include wetland enhancement, buffer enhancement, or stream channel creation. Additional mitigation would be implemented to increase the overall ecological success and functions of the mitigation site. This additional mitigation would be considered mitigation above and beyond what is required according to mitigation replacement ratios. For example, additional mitigation could involve enhancing existing wetlands on a mitigation site by replacing reed canarygrass with native vegetation. This would prevent reed canarygrass from spreading to wetland re-establishment areas, reduce maintenance costs in re-established wetlands, and support compliance of the invasive plant cover performance standard.

## **Compensation for Permanent Wetland Shading Impacts**

The proposed bridge over Wetland GW will shade plants underneath the bridge and prevent growth of vegetation. Vegetation is expected to survive on both sides of the bridge and to some extent underneath the bridge toward the outer edges. The 0.32 acres of permanent shading impacts to Wetland GW will be mitigated at a 3-to-1 ratio by providing a minimum of 0.96 acres of riparian restoration adjacent to the North Tributary to Issaquah Creek. It is noted that mitigation of shading impacts is not required by current regulations or agreements, but is proposed for this project as additional mitigation. The enhancement activities would entail removing invasive reed canarygrass, Himalayan blackberry, Japanese knotweed, and other non-native and invasive plant species to enhance riparian vegetation characteristics, and replanting with native vegetation. Figure 4 shows the locations of the buffer enhancement area along the North Tributary.

## **Compensation for Permanent Wetland Buffer Impacts**

Permanent wetland buffer impacts of 0.36 acres would be mitigated at a 1-to-1 compensation ratio by providing a minimum of 0.36 acres of buffer adjacent to wetland re-establishment on the wetland mitigation site(s) selected (Figures 4 and 5). A 110-foot buffer is proposed on the mitigation sites between wetland re-establishment or enhancement and adjacent roads or parking lots, and is slightly larger than the City of Issaquah's 100-foot buffer requirement. According to Ecology (2005), a 110-foot buffer is recommended between re-established Category II wetlands and moderate impact land uses.

## **Restoration of Temporary Construction Impacts**

The 0.41 acres of temporary impacts to Wetland GW and the buffers of Wetland GW associated with bridge construction along 6<sup>th</sup> Avenue SE will be mitigated at a 1-to-1 ratio by providing 0.41 acres of replanting and restoring disturbed areas with native vegetation after clearing and construction is complete. Figure 4 shows the locations of temporary impact re-establishment.

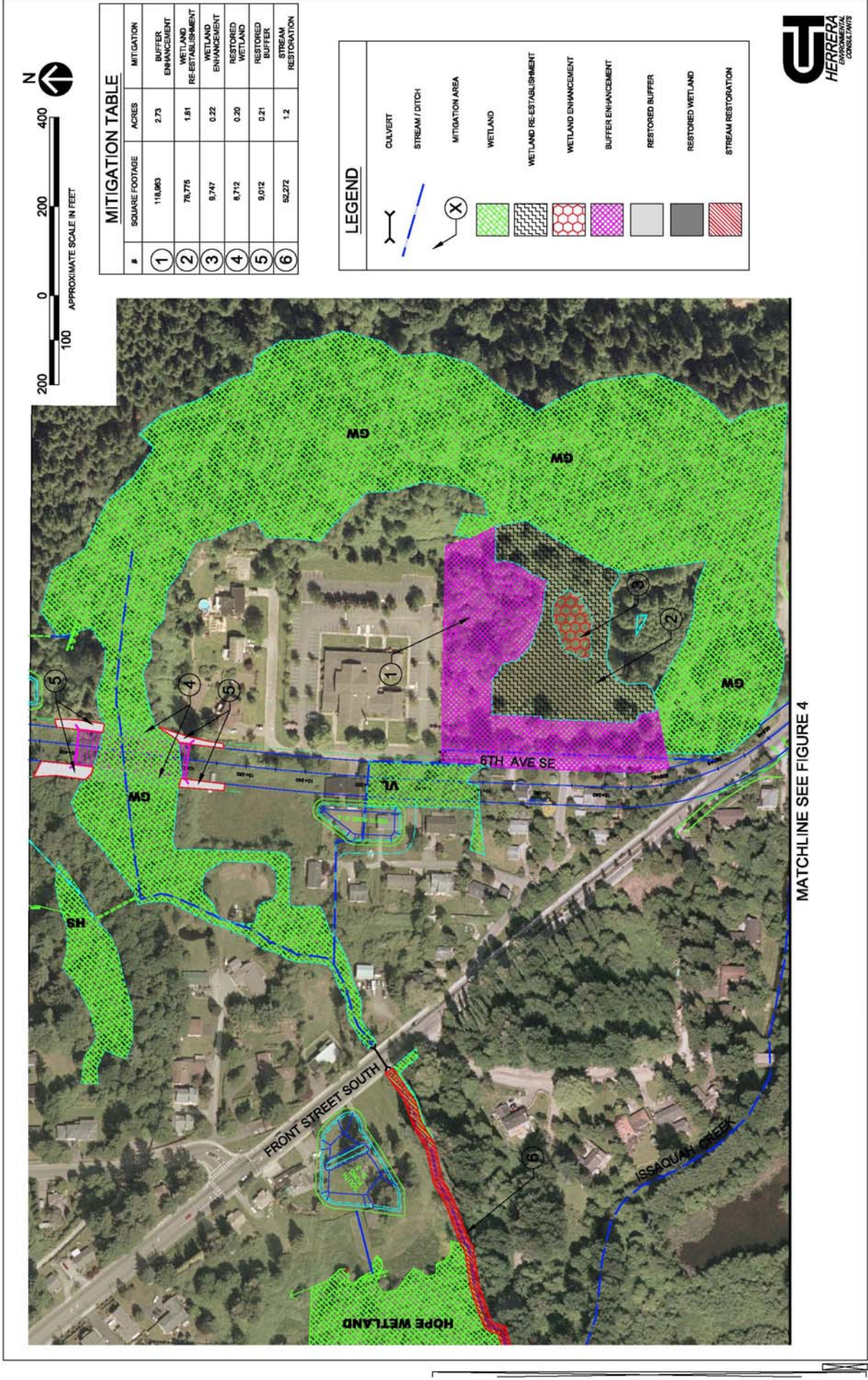


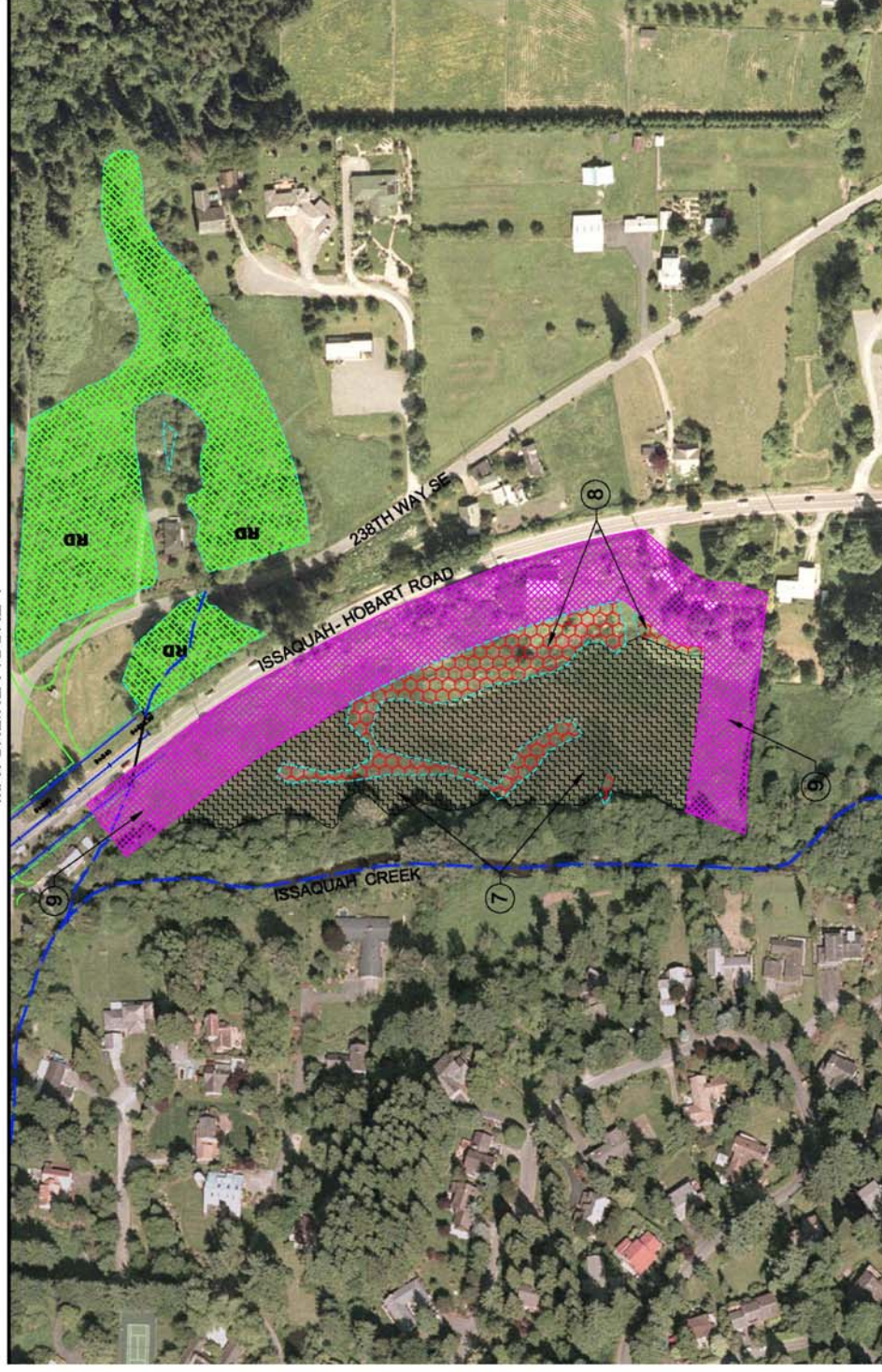
Figure 4. Potential Wetland Mitigation Areas - Option 1

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MATCHLINE FIGURE 4



MITIGATION TABLE			
#	SQUARE FOOTAGE	ACRES	MITIGATION
7	139,499	3.20	WETLAND RE-ESTABLISHMENT
8	50,088	1.16	WETLAND ENHANCEMENT
9	185,795	3.91	BUFFER ENHANCEMENT

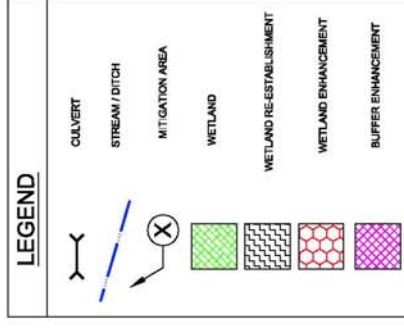


Figure 5. Proposed Wetland Mitigation Areas - Option 2

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## **Conceptual Mitigation Plan Option 1 – Wetland GW**

An upland inclusion within Wetland GW on the east side of 6<sup>th</sup> Avenue SE provides an opportunity for wetland re-establishment. This area is designated as mitigation area 2 on Figure 4. This area represents historic wetland that was filled in association with past development. Mitigation would involve re-establishing forested wetland conditions. The boundary of this re-establishment area is based on observations made in the field and aerial photograph interpretation. If Option 1 were pursued, formal wetland delineations would be conducted to delineate the wetland edge adjacent to this upland inclusion. If a minimum of 1.77 acres of re-establishment area is not available after delineations are conducted, additional wetland mitigation area will be provided at the Squak Valley Park (see Option 2) or elsewhere within the same drainage basin within the City of Issaquah.

Existing vegetation within the wetland re-establishment area is dominated by Himalayan blackberry, thistle, horsetail, and buttercup. The west, north, and eastern edges of the wetland re-establishment area are contiguous with Wetland GW. Mature forested upland would abut the south edge of wetland re-establishment. An existing patch of wetland within the re-establishment area would need to be enhanced because it is dominated by reed canarygrass. This is identified as mitigation area 3 on Figure 4 and is approximately 0.22 acres. The owner of this property (Wellington Park Pointe) has been contacted regarding this proposal. The owner is supportive of using this property for SE Bypass mitigation. Purchase of this particular piece of property for wetland mitigation would have the added benefit of providing long-term protection, through public ownership, of a large portion of Wetland GW.

Implementation of Option 1 would involve providing a minimum 110-foot buffer between the wetland re-establishment area and the proposed SE Bypass to the west and the existing church parking lot to the north. A portion of wetlands proposed for re-establishment will lie within this 110-foot buffer. In addition, existing Wetland GW and upland area within this buffer zone would be enhanced where necessary by replacing invasive or exotic vegetation with native vegetation.

## **Conceptual Mitigation Plan Option 2 – Squak Valley Park**

Figure 5 provides a conceptual view of the Squak Valley Park site with its opportunities for wetland re-establishment and enhancement. The City-owned Squak Valley Park site is located between Issaquah Hobart Road and Issaquah Creek just south of SE 96<sup>th</sup> Street. The site is located within the historic floodplain of Issaquah Creek, but was isolated from the stream by a flood control levee that was constructed in the 1930's. A small tributary flows along the northern edge of the property before draining into Issaquah Creek. The now unmaintained levee that is adjacent to the east side of Issaquah Creek prevents flooding on the site. The site was likely covered by a large forested floodplain wetland prior to historical farming activities and subsequent construction of the levee. Upland grasses dominate the site. Patches of emergent wetland remain on the site and are dominated by reed canarygrass. The boundaries of existing wetlands are based on a delineation conducted by the Army Corps of Engineers in support of a stream restoration project that is proposed for the site. If Option 2 were pursued, re-assessment of wetland boundaries will be necessary.

Restoration of the site provides wetland re-establishment and wetland enhancement opportunities. These features would be designed to be compatible with the proposed stream restoration project.



on the site, which involves breaching the levee and creating channels on the site (at this time, the project is awaiting Federal funding). This would also re-introduce flooding to the site.

Up to approximately 3.20 acres of wetland re-establishment can be created at the Squak Valley Park site (see mitigation area 7, Figure 5), exceeding the 1.77 acres of wetland mitigating proposed for this project. Should this site be selected as the preferred mitigation site for the project, the stream restoration design that has been developed would be modified to maximize the restoration and mitigation opportunities, consistent with the objectives of both projects.

Existing patches of emergent wetland would need to be enhanced because they are dominated by reed canarygrass. Approximately 1.16 acres of wetland enhancement are available on the site (see mitigation area 8, Figure 5).

Implementation of Option 2 would involve providing a minimum 110-foot buffer between the wetland re-establishment and enhancement area and Issaquah-Hobart Road. In addition, a buffer would be provided adjacent to the south property boundary of the site. A portion of wetlands proposed for re-establishment will lie within this 110-foot buffer. In addition, existing wetlands and upland area within this buffer zone would be enhanced where necessary by replacing invasive or exotic vegetation with native vegetation.

## **6.6 Wetland Reference Sites**

The reference wetland for mitigating fill at Wetland VL is Wetland GW. In addition to providing for a 3:1 replacement ratio, mitigating the Wetland VL impact with higher wetland values similar to Wetland GW will result in improved wetland function.

## **6.7 Recommendations for Future Wetland Design**

Potential additional work recommended for future design phases of this mitigation project include:

- Wetland mitigation design should draw on the experience of similar projects in the Issaquah Area. Staff from the City of Issaquah Planning Department, who review mitigation plans and monitoring reports, should be consulted early in the design process.
- Site soils should be verified with test pits, to verify depth of fill (if present) and suitability of soils at depth.
- Surface hydrology and shallow groundwater levels should be monitoring using shallow wells or piezometers. At least one year of data should collected, assuming that no unusual climatic patterns are present.
- Update the wetland delineation to verify final mitigation requirements and before final site selection is made, to ensure that sufficient site area is available for wetland and buffer creation.

## **7 Conceptual Maintenance, Monitoring, And Contingency Plan**

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### **7.1 Description of the Goals of Monitoring**

Monitoring site conditions will be necessary to comply with regulatory requirements to document implementation and success of the project's compensatory mitigation.

Specific monitoring elements for compensatory mitigation will be developed in detail in future design and permitting phases after mitigation elements of the project have been firmly established. Performance standards and monitoring methods will be developed at that time to ensure that goals and objectives are met.

### **7.2 Contingency Plan**

The monitoring plan will take into account unknowns that may affect meeting the performance goals and will identify response actions under different scenarios. Therefore, a contingency plan will be developed as part of the monitoring plan to ensure that project mitigation goals and objectives can be met.

### **7.3 Anticipated Monitoring Schedule**

As noted above, monitoring begins after the first year of planting of a mitigation site to verify 100% plant survival, in accordance with the contractor's warranty. Visual monitoring will be conducted annually, with response actions developed accordingly to meet the long-term mitigation success goals, and formal written monitoring reports prepared and issued at Years 1, 3, 5, and 10.

### **7.4 Maintenance of Mitigation Site and Mechanism for Protecting in Perpetuity.**

As the project owner, the City of Issaquah will retain permanent ownership through fee simple title and will be responsible for monitoring and maintenance of all mitigation sites. This includes all mitigation and utility tracts, as well as offsite mitigation sites. The Public Works Operations Department will incorporate the stormwater facilities maintenance into their work plan in accordance with levels of service that have been established for the City. Maintenance of wetland and stream mitigation sites will likely be contracted out to vegetation maintenance contractors. The WSDOT Wetland Monitoring and Assessment Program may also be able to provide these services. Budgeting for monitoring and maintenance will be identified in the overall authorized project budget, with the expectation that necessary funding will be provided over the full duration of the monitoring schedule.

## 8 References

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## **APPENDIX A**

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# **WETLAND CLASSIFICATIONS, WETLAND IMPACTS, AND WETLAND MITIGATION REQUIREMENTS**

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## **Southeast Bypass Project, Issaquah, Washington**

Prepared for

City of Issaquah  
Public Works Engineering Department  
1775 – 12<sup>th</sup> Avenue NW  
Issaquah, Washington 98027

Prepared by

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October 31, 2005

## Introduction

This report provides the results of work performed in January and May 2005 by Herrera Environmental Consultants, Inc. (Herrera) for the City of Issaquah to confirm wetland characteristics, wetland and buffer impacts, and associated wetland mitigation requirements for the Southeast Bypass project in Issaquah, Washington. The work was performed specifically to evaluate wetland impacts and mitigation scenarios for the Alternative 5 – Modified Southeast Bypass Alignment. This report is a revision of the March 11, 2005 Draft (Herrera 2005) that was included in the CP3 document, which was commented on by the signatory agencies. The following revisions were made to the report:

- This report refers to a modified Alternative 5 alignment, which is identical to Alternative 5 presented in the Supplemental Draft Environmental Impact Statement (SDEIS) (FHWA et. al. 2004) but with the road shifted west of Wetland GW to avoid wetland fill.
- Additional reconnaissance of wetlands revealed additional upland area within the boundaries of Wetland GW, which resulted in a revision to Figure 1.
- The hydrogeomorphic classification of Wetland GW changed from *riverine* to *depressional outflow*.
- Additional information is provided on surface water and piped water flows between Wetland GW and Wetland VL.
- A wetland functions assessment of Wetland GW, Wetland VL, and the Hope Property Wetland was added.
- The Ecology rating of Wetland GW changed from a Category I wetland to a Category II wetland, based on a revised rating form completed by Herrera in conjunction with Richard Robohm of the Department of Ecology.
- Because Wetlands VL and GW are considered the same wetland unit according to the Ecology rating system, the rating of Wetland VL changed from a Category III wetland to a Category II wetland.
- The southern boundary of Wetland VL was re-delineated as shown on Figure 1. The size of the wetland increased from 0.40 acres to 0.59 acres. As a result, the fill impact to Wetland VL increased to 0.59 acres.
- Permanent and temporary impacts to Wetland GW and the buffer changed slightly based on minor design changes to the bridge.
- The conceptual wetland mitigation approach was revised based on guidance from Ecology including new potential mitigation areas shown on Figures 2 and 3.
- Preliminary mitigation goals and objectives were added.

Wetlands in the project area were previously delineated in June and December of 1997 and the findings, including wetland ratings were presented in a report entitled *Jurisdictional Wetland Delineation Draft Technical Report* (Herrera 1998). Herrera performed field reconnaissance to identify if there were significant differences in the outer boundaries of previously documented wetlands, to determine the existence and delineate the extent of wetlands at the Hope property, and to visually assess current habitat characteristics and fish usage in the North Tributary of Issaquah Creek. Following the reconnaissance, Herrera evaluated wetland ratings in the project area according to the Washington State Department of Ecology (Ecology) 2004 Washington State Rating System for Western Washington, and the City of Issaquah rating system.

Figure 1 shows delineated wetlands and estimated wetland and buffer impact areas and Attachment 1 contains the Ecology rating forms. Table 1 summarizes the wetland conditions observed in the Alternative 5 – Modified Southeast Bypass Alignment project area.

**Table 1. Summary of wetlands in Alternative 5 – Modified Southeast Bypass Alignment project area, Issaquah, Washington.**

Wetland Name	Size (acres)	USFWS Class <sup>a</sup>	Ecology Category <sup>b</sup>	Ecology Recommended Buffer Width (feet) <sup>c</sup>	City of Issaquah Class <sup>d</sup>	City of Issaquah Buffer Width (feet) <sup>e</sup>
GW	26.6	PFO/PSS/PEM	II	110	1	100
HS	0.85	PFO	II	110	2	50
VL	0.59	PSS	II	110	3	25
Hope Property	60+	PFO/PEM	II	110	1	100

<sup>a</sup> USFWS classification of wetlands is based on Cowardin et al. (1979): palustrine forested (PFO), palustrine scrub-shrub (PSS), and palustrine emergent (PEM).

<sup>b</sup> Ecology rating of wetlands is based on Hruby (2004). Ecology's rating system rates Wetlands GW, HS, and VL as a single wetland unit.

<sup>c</sup> Ecology recommended buffer widths based on Ecology (2005).

<sup>d</sup> City of Issaquah classification of wetlands is based on Chapter 18.10.590 of the municipal code.

<sup>e</sup> City of Issaquah required buffers are based on Chapter 18.16.630 of the municipal code.

## Wetland Reconnaissance and Boundaries

On January 11, 2005, Herrera biologists performed reconnaissance of the project area to confirm the wetland boundaries and hydrologic conditions of four wetlands previously delineated in the project area (Wetland GW, Wetland VL, and Wetland HS). Herrera also delineated the boundary of an existing wetland at the Hope property located along Front Street adjacent to the North Tributary to Issaquah Creek (see Figure 1). Wetlands were assessed by walking along the outer boundaries. Wetland boundaries observed in the field were compared to previously delineated boundaries. A detailed CAD drawing showing the previously delineated wetlands was used in the field to compare current and previous conditions. As a result, Herrera revised the southern boundary of wetland VL. On May 24, 2005, a Herrera biologist performed additional reconnaissance accompanied by a representative from Ecology to discuss wetland









ratings (Robohm 2005). On September 19, 2005, a Herrera biologist performed additional reconnaissance of Wetland GW in support of identifying suitable wetland mitigation opportunities within previously disturbed portions of the wetland.

### **Wetland GW**

Wetland GW is located at the base of Tiger Mountain and east of Front Street. Wetland GW is approximately 21 acres in size. Wetlands in the vicinity of Wetland GW include Wetlands HS, RD, and VL. An abandoned railroad grade separates Wetland HS from Wetland GW and SE 96<sup>th</sup> Street separates Wetland RD from Wetland GW. Sixth Avenue SE separates Wetland GW from Wetland VL. Since these four wetlands are bisected by human-made features but have a level surface water connection between them, they are rated as a single wetland unit based on the 2004 Ecology rating system (Hruby 2004).

The outer boundaries of Wetlands GW, HS, and RD are consistent with that indicated by the 1997 delineation. On September 19, 2005, an upland inclusion was observed within Wetland GW located on the west side of 6<sup>th</sup> Avenue SE (Figure 1). In addition, the upland area within Wetland GW on the east side of 6<sup>th</sup> Avenue SE and south of the church parking lot is potentially larger than that shown in the 1997 delineation (Herrera 1998). If this area is pursued for wetland mitigation purposes (see Proposed Mitigation section), formal wetland delineation will be conducted.

The source of water for Wetland GW is ground water seeps along the base of Tiger Mountain. Surface water in the northern and eastern portion of the wetland discharges directly to the North Tributary to Issaquah Creek. At the south portion of the wetland, surface water flows along ditches beside SE 96<sup>th</sup> Street and 6<sup>th</sup> Avenue SE, then flows through a culvert beneath 6<sup>th</sup> Avenue SE, which discharges to Wetland VL. Flows exit Wetland VL via an unnamed ditched stream that reenters Wetland GW and then flows into the North Tributary to Issaquah Creek. Surface water also leaves Wetland GW near the south end of 6<sup>th</sup> Avenue SE via a stormwater pipe that connects to the Front Street South stormwater system. That water discharges into the North Tributary at the Front Street culvert crossing of that stream.

Wetland GW is a depressional outflow wetland containing three major plant communities including mixed forest, scrub-shrub, and clearings dominated by emergent species. These communities contain many native species including western red cedar, red alder, salmonberry, lady fern, and skunk cabbage. Wetland GW is considered Category II according to the Ecology rating system and Class 1 according to the City of Issaquah rating system (see Table 1).

### **Wetland VL**

Wetland VL is located adjacent to the west side of 6<sup>th</sup> Avenue SE and is approximately 0.59 acres in size.

The boundary of Wetland VL is larger than that indicated by the 1997 delineation.

The source of water for Wetland VL is ground water and surface water runoff from Wetland GW via a concrete culvert located beneath 6<sup>th</sup> Avenue SE. A level surface water connection between the two wetlands was observed. Surface water in Wetland VL discharges to Wetland GW and the North Tributary to Issaquah Creek via an unnamed ditched stream that flows northwest between several residential lots.

Wetland VL is a depressional outflow wetland containing one major plant community, scrub-shrub, dominated by Sitka willow and red-osier dogwood. Wetland VL is considered Category II according to the Ecology rating system, and Class 3 according to the City of Issaquah rating system (see Table 1).

### **Hope Property Wetland**

The Hope property is located along Front Street, adjacent to the North Tributary to Issaquah Creek. A large wetland (approximately 60 acres) occurs adjacent to the north bank of the North Tributary to Issaquah Creek. This wetland occupies approximately 4.4 acres of the Hope Property with the remainder of the wetland located offsite to the north and west on mostly City-owned properties. The boundary of the portion of the wetland located on the Hope property was delineated during the reconnaissance and as shown on Figure 1.

The Hope property wetland is a riverine wetland that extends offsite westward to Issaquah Creek. The wetland contains two major plant communities including forest dominated by red alder and an emergent community dominated by invasive reed canarygrass. The Hope Wetland is considered Category II according to the Ecology rating system and Class 1 according to the City of Issaquah rating system (see Table 1).

## **Wetland Functions Assessment**

The functions and values provided by wetlands in the project area were evaluated in order to determine the appropriate level of mitigation required to compensate for temporary and permanent wetland and wetland buffer impacts. The functions of Wetland GW and the Hope Property Wetland were assessed using the method presented in Volume 1 of *Methods for Assessing Wetland Functions* (Hruby et al. 1999). The wetland functions are described in the following subsections, and a summary of functions provided by the wetlands in the project area is presented in Table 2.

Scores for each function range between 0 and 10, with a 10 representing the highest level of performance. A score between 1 and 3 is considered low performance, a score between 4 and 6 is considered moderate, and a score between 7 and 10 is considered high.

Wetland GW and Wetland VL were rated together as one functional assessment unit since there is a level surface water connection between the two wetlands via a culvert. Wetland GW and Wetland VL have moderate performance scores for most of the functions assessed. High

performance scores include potential for reducing/decreasing downstream erosion, potential for ground water recharge, habitat suitability for anadromous fish, and habitat suitability for resident fish.

**Table 2. Wetland functional assessment scores for Wetland GW and Wetland VL and the Hope Property wetland at the Alternative 5 Southeast Bypass Alignment project area, Issaquah, Washington.**

Wetland Function	Wetland GW and Wetland VL Score <sup>a</sup>	Hope Property Wetland <sup>a</sup>
Potential for removing sediment	6 (M)	8 (H)
Potential for removing nutrients	5 (M)	8 (H)
Potential for toxic metals and organic compounds	5 (M)	7 (H)
Potential for reducing peak flows	6 (M)	8 (H)
Potential for reducing/decreasing downstream erosion	8 (H)	8 (H)
Potential for ground water recharge	7 (H)	4 (M)
General habitat suitability	6 (M)	9 (H)
Habitat suitability for invertebrates	6 (M)	8 (H)
Habitat suitability for amphibians	6 (M)	6 (M)
Habitat suitability for anadromous fish	7 (H)	7 (H)
Habitat suitability for resident fish	7 (H)	9 (H)
Habitat suitability for wetland-associated birds	4 (M)	10 (H)
Habitat suitability for wetland-associated mammals	5 (M)	6 (M)
Native plant richness	6 (M)	8 (H)

<sup>a</sup> "M" and "H" refer to moderate and high level of performance.

The Hope Property Wetland has high performance scores for most of the functions assessed. Moderate performance scores include potential for groundwater recharge and habitat suitability for wetland-associated mammals.

## Stream Conditions

The North Tributary to Issaquah Creek (a.k.a., Lewis Lane Tributary and Hope Creek), including the area of the proposed 6<sup>th</sup> Avenue SE bridge crossing, was visually assessed to document current habitat characteristics and fish usage. The tributary has a channel approximately two to three feet wide and six inches deep. The stream's substrate is mainly silt and sand. The banks of the tributary are well vegetated with native and invasive species. There is a seasonal surface water connection between the tributary and Issaquah Creek during high flows. During low flows, the North Tributary discharges to the Hope Property wetland and discharges to Issaquah Creek through the ground due to blockages caused by past land use activities and beaver dams. No fish passage barriers beneath Front Street were observed. A log weir observed in the stream downstream of the culvert appeared to be fish passable.

Salmonid species have been documented using Issaquah Creek for migration, spawning, and rearing. Cutthroat trout are resident in the North Tributary. Juvenile chinook salmon use the Hope Property wetland as refuge during flood events in Issaquah Creek, but encounter stranding conditions. The *Southeast Issaquah Bypass Biological Assessment* (2004) indicates that salmonids may use the lower reaches of the North Tributary but are unlikely to exist upstream. According to the City of Issaquah rating system – Chapter 18.10.780 – the North Tributary is considered a Class 2S Stream and would require a 100-foot buffer as it is used by salmonids.

## Wetland Ratings and Buffers

Following the January 11, and May 24, 2005 reconnaissance, wetlands in the project area were rated according to the Ecology (Hruby 2004) and the City of Issaquah rating systems. Copies of the Ecology rating forms are included in Attachment A. Table 1 provides a summary of the size, classification, and buffer requirement for each wetland identified.

The Issaquah Municipal Code specifies fixed buffer widths for wetlands depending on the class of wetland. Ecology (2005) guidance provides a range of buffer widths between 50 and 300 feet for Category II wetlands. The appropriate buffer width within this range is determined by evaluating the wetland characteristics (e.g., habitat score based on the Ecology rating system) and the impact level (low, moderate, or high) of adjacent land use. The recommended buffer width for Wetlands GW, VL, HS, and the Hope Wetland is 110 feet because these wetlands have a moderate score for habitat functions and are adjacent to moderate impact land use.

## Wetland Fill Areas and Buffer Impacts

Wetland areas that will be filled and areas of potential buffer impacts within the project area were evaluated by analyzing road design drawings provided by the City of Issaquah. The road design conforms to Alternative 5 – Modified, which is identical to Alternative 5 in the SDEIS (FHWA et. al. 2004) but with the road shifted west of Wetland GW to avoid wetland fill. Both permanent and temporary impacts were identified. Table 3 tabulates the estimated permanent and temporary wetland and buffer impacts shown on Figure 1.

**Table 3. Summary of wetland and buffer impacts for Alternative 5 – Modified Southeast Bypass Alignment, Issaquah, Washington.**

Wetland Name	Permanent Impacts		Temporary Impacts	
	Wetland (acres)	Buffer (acres)	Wetland (acres)	Buffer (acres)
VL	(fill) 0.59	–	–	–
GW	(shade) 0.32	0.36	0.20	0.21
Total	0.91	0.36	0.20	0.21

Alternative 5 - Modified will result in 0.59 acres of permanent fill impacts to Wetland VL and 0.32 acres of permanent shading impacts to Wetland GW. Permanent buffer impacts will affect only Wetland GW and will total 0.36 acres. Temporary impacts include disturbance to 0.20 acres of wetland and 0.21 acres of buffer affecting Wetland GW.

The project will result in the following impacts to wetlands based on Cowardin Class:

- Permanent fill impacts to 0.59 acres of PSS wetlands at Wetland VL;
- Permanent shading of 0.32 acres of PSS wetlands at Wetland GW;
- Temporary wetland impacts to 0.20 acres of PSS wetlands at Wetland GW.

## **Impacts of Proposed Road Fill on Wetlands**

The proposed project would place road fill in 0.59 acres of Wetland VL. The current source of water for Wetland VL is ground water and surface water that flows from Wetland GW to the west via a concrete culvert beneath 6<sup>th</sup> Avenue SE. Water currently flows out of Wetland VL to the northwest via a ditched stream that empties into Wetland GW and the North Tributary of Issaquah Creek. The surface water connection between Wetland GW and the North Tributary of Issaquah Creek would be maintained via an open, restored stream channel through the South Pond S-2 tract. Flows exiting Wetland GW would be kept separate from storm water flows to and from the proposed South Pond S-2.

## **Mitigation Goals and Objectives**

Mitigation for temporary and permanent impacts to wetlands and wetland buffers will strive to meet several goals. Mitigation will re-establish palustrine forested communities. Wetland buffer will be enhanced to replace lost wetland buffer. The North Tributary to Issaquah Creek will be enhanced adjacent to the Hope Property to replace stream functions permanently lost upstream due to shading caused by a proposed bridge over Wetland GW. Mitigation will replace wetland functions lost as a result of the proposed project. Wetland acreage lost due to permanent impacts resulting from the project will be replaced. Wetlands and wetland buffers temporarily impacted by the project will be replanted and restored.

The primary goal of the project is to avoid and minimize impacts to wetlands and their buffers. Impacts that are unavoidable will be mitigated. Goals and objectives for wetland mitigation for the proposed project are presented below. In the final mitigation plan, these goals and objectives will be refined and performance standards will be developed.

The goals of the SE Bypass wetland mitigation are to:

- Replace lost wetland area and functions of impacted wetland that are proposed to be filled, consistent with Ecology guidelines, U.S. Army Corps of Engineers Section 404 permit requirements, and City of Issaquah Critical Areas Ordinance regulations.
- Replace lost buffer areas that are proposed to be impacted, both temporarily and permanently, consistent with Ecology guidelines and City of Issaquah Critical Areas Ordinance regulations.

The objectives of the SE Bypass wetland mitigation include:

- Replace unavoidable impacts to wetland area to ensure no net loss of wetland area. Filled wetlands shall be compensated by creating new wetlands that are lost due to project impacts, in an amount equal to the wetland loss multiplied by a mitigation ratio that is applicable to the wetland rating.
- Replace unavoidable impacts to wetland functions. Filled wetlands shall be compensated by creating new wetlands with equal or better function than that lost due to project impacts.
- Replace unavoidable impacts to wetland buffers. Impacted wetland buffers shall be compensated by replacement with new buffers having equal or better area and function.
- Mitigate for temporary impacts to wetlands and wetland buffers. Wetlands and buffers that are disturbed by construction activities shall be mitigated through restoration and replanting of the disturbed area.
- Reestablish appropriate native vegetation communities and processes. Habitat functions can be maximized by selecting native vegetation that is appropriate to the site conditions and natural processes.
- Provide appropriate hydrology for wetland and buffer creation and enhancements.
- Maintain flood protection. Mitigation designs should not result in increased flood impacts to neighboring properties.

## Proposed Mitigation

Table 4 summarizes the proposed mitigation for permanent and temporary impacts to wetlands and buffers, and locations of mitigation sites are shown on Figures 2 and 3. These figures show mitigation acreages that exceed the minimum required mitigation shown in Table 4, to provide a factor of safety at this stage in the mitigation design process.

**Table 4. Summary of mitigation proposed for Alternative 5 Modified Southeast Bypass Alignment, Issaquah, Washington.**

Impact	Area Impacted (acres)	Compensation Ratio	Mitigation Description	Location on Figures	
				Mitigation Option 1	Mitigation Option 2
Permanent wetland fill – VL	0.59	3:1	1.77 acres of wetland re-establishment as part of Option 1 or Option 2. Existing wetlands would be enhanced in conjunction with wetland re-establishment under both options.	2 and 3 (Figure 2)	7 and 8 (Figure 3)
Shade impacts – GW	0.32	3:1	0.96 acres of riparian habitat enhancement.	6 (Figure 2)	6 (Figure 2)
Permanent buffer loss – GW	0.36	1:1	0.36 acres of replaced buffer area.	1 (Figure 2)	9 (Figure 3)
Temporary wetland and buffer disturbance	0.41	1:1	0.41 acres of wetland and buffer restored and replanted.	4 (Figure 2)	5 (Figure 3)

### Compensation for Permanent Wetland Fill Impacts

The conceptual mitigation plan identifies two options for compensatory mitigation of permanent wetland fill impacts. Both options are considered on-site mitigation because they are in close proximity to the project site and wetland impacts. Under both options, 0.59 acres of permanent impact to Wetland VL would be mitigated at a 3-to-1 ratio, by re-establishing a minimum of 1.77 acres of wetlands. This mitigation ratio is recommended by Ecology (2004) when impacting Category II wetlands, and greatly exceeds the City of Issaquah's 1-to-1 replacement ratio requirement for Class 3 wetlands.

Additional mitigation in conjunction with wetland re-establishment may include wetland enhancement, buffer enhancement, or stream channel creation. Additional mitigation would be implemented to increase the overall ecological success and functions of the mitigation site. This additional mitigation would be considered mitigation above and beyond what is required according to mitigation replacement ratios. For example, additional mitigation could involve



enhancing existing wetlands on a mitigation site by replacing reed canarygrass with native vegetation. This would prevent reed canarygrass from spreading to wetland re-establishment areas, reduce maintenance costs in re-established wetlands, and support compliance of the invasive plant cover performance standard.

### **Compensation for Permanent Wetland Shading Impacts**

The proposed bridge over Wetland GW will shade plants underneath the bridge and prevent growth of vegetation. Vegetation is expected to survive on both sides of the bridge and to some extent underneath the bridge toward the outer edges. The 0.32 acres of permanent shading impacts to Wetland GW will be mitigated at a 3-to-1 ratio by providing a minimum of 0.96 acres of riparian restoration adjacent to the North Tributary to Issaquah Creek. The enhancement activities would entail removing invasive reed canarygrass, Himalayan blackberry, Japanese knotweed, and other non-native and invasive plant species to enhance riparian vegetation characteristics, and replanting with native vegetation.

### **Restoration of Temporary Construction Impacts**

Temporary impacts to wetlands and buffers will be mitigated by replanting and restoring disturbed areas with native vegetation after clearing and construction is complete (Figure 2). The 0.41 acres of temporary impacts to Wetland GW and the buffers of Wetland GW associated with bridge construction along 6<sup>th</sup> Avenue SE will be mitigated at a 1-to-1 ratio by providing 0.41 acres of replanting and restoring disturbed areas with native vegetation after clearing and construction is complete.

### **Compensation for Permanent Wetland Buffer Impacts**

Permanent wetland buffer impacts of 0.36 acres would be mitigated at a 1-to-1 compensation ratio by providing a minimum of 0.36 acres of buffer adjacent to wetland re-establishment on the wetland mitigation site(s) selected (Figures 2 and 3). A 110-foot buffer is proposed on the mitigation sites between wetland re-establishment or enhancement and adjacent roads or parking lots.

### ***Mitigation Plan Option 1 – Wetland GW***

An upland inclusion within Wetland GW on the east side of 6<sup>th</sup> Avenue SE provides an opportunity for wetland re-establishment. This area is designated as mitigation area 2 on Figure 2. This area represents historic wetland that was filled in association with past development. Mitigation would involve re-establishing forested wetland conditions. The boundary of this re-establishment area is based on observations made in the field and aerial photograph interpretation. If Option 1 were pursued, formal wetland delineations would be conducted to delineate the wetland edge adjacent to this upland inclusion. If a minimum of 1.77 acres of re-establishment area is not available after delineations are conducted, additional wetland mitigation

area will be provided at the Squak Valley Park (see Option 2) or elsewhere within the same drainage basin within the City of Issaquah.

Existing vegetation within the wetland re-establishment area is dominated by Himalayan blackberry, thistle, horsetail, and buttercup. The west, north, and eastern edges of the wetland re-establishment area are contiguous with Wetland GW. Mature forested upland would abut the south edge of wetland re-establishment. An existing patch of wetland within the re-establishment area would need to be enhanced because it is dominated by reed canarygrass. This is identified as mitigation area 3 on Figure 2 and is approximately 0.22 acres. The owner of this property (Wellington Park Pointe) has been contacted regarding this proposal. The owner is supportive of using this property for SE Bypass mitigation. Purchase of this particular piece of property for wetland mitigation would have the added benefit of providing long-term protection, through public ownership, of a large portion of Wetland GW.

Implementation of Option 1 would involve providing a minimum 110-foot buffer between the wetland re-establishment area and the proposed SE Bypass to the west and the existing church parking lot to the north (Figure 2). According to Ecology (2005), a 110-foot buffer is recommended between re-established Category II wetlands and moderate impact land uses. A portion of wetlands proposed for re-establishment will lie within this 110-foot buffer. In addition, existing Wetland GW and upland area within this buffer zone would be enhanced where necessary by replacing invasive or exotic vegetation with native vegetation.

### ***Mitigation Plan Option 2 – Squak Valley Park***

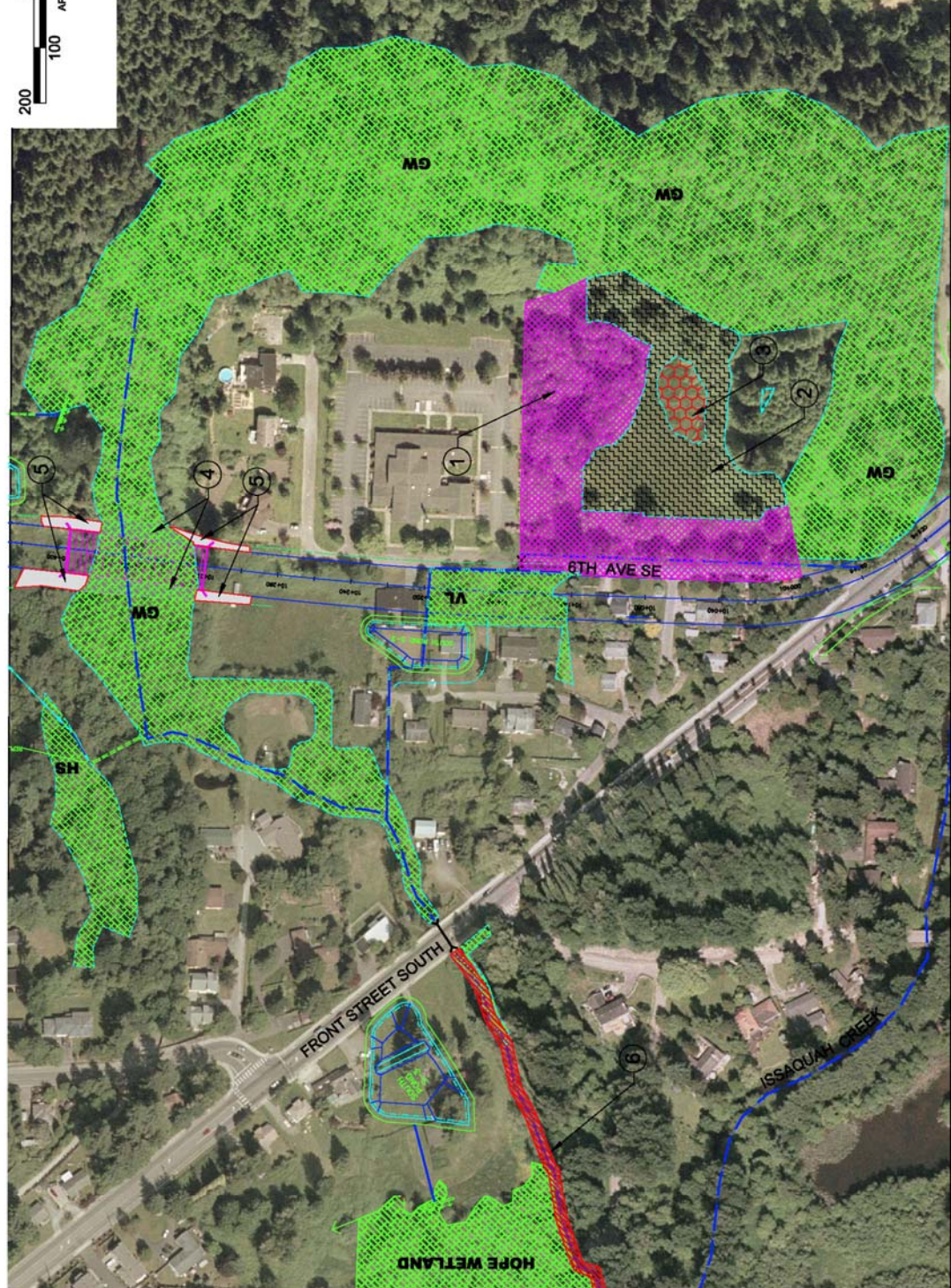
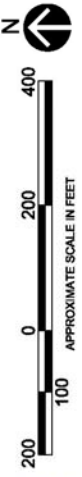
Figure 3 provides a conceptual view of the Squak Valley Park site with its opportunities for wetland re-establishment and enhancement. The City-owned Squak Valley Park site is located between Issaquah Hobart Road and Issaquah Creek just south of SE 96<sup>th</sup> Street. The site is located within the historic floodplain of Issaquah Creek, but was isolated from the stream by a flood control levee that was constructed in the 1930's. A small tributary flows along the northern edge of the property before draining into Issaquah Creek. The now unmaintained levee that is adjacent to the east side of Issaquah Creek prevents flooding on the site. The site was likely covered by a large forested floodplain wetland prior to historical farming activities and subsequent construction of the levee. Upland grasses dominate the site. Patches of emergent wetland remain on the site and are dominated by reed canarygrass. The boundaries of existing wetlands are based on a delineation conducted by the Army Corps of Engineers in support of a stream restoration project that is proposed for the site. If Option 2 were pursued, re-assessment of wetland boundaries will be necessary.

Restoration of the site provides wetland re-establishment and wetland enhancement opportunities (Figure 3). These features would be designed to be compatible with the proposed stream restoration project on the site, which involves breaching the levee and creating channels on the site (at this time, the project is awaiting Federal funding). This would also re-introduce flooding to the site.

Approximately 3.20 acres of wetland re-establishment (see mitigation area 7, Figure 3) exceeds the 1.77-acre obligation for mitigating impacts to Wetland VL. Should this site be selected as the preferred mitigation site for the project, the stream restoration design that has been developed would be modified to maximize the restoration and mitigation opportunities, consistent with the objectives of both projects.

Existing patches of emergent wetland would need to be enhanced because they are dominated by reed canarygrass. Approximately 1.16 acres of wetland enhancement are available on the site (see mitigation area 8, Figure 3).

Implementation of Option 2 would involve providing a minimum 110-foot buffer between the wetland re-establishment and enhancement area and Issaquah-Hobart Road. In addition, a buffer would be provided adjacent to the south property boundary of the site. According to Ecology (2005), a 110-foot buffer is recommended between re-established Category II wetlands and moderate impact land uses. A portion of wetlands proposed for re-establishment will lie within this 110-foot buffer. In addition, existing wetlands and upland area within this buffer zone would be enhanced where necessary by replacing invasive or exotic vegetation with native vegetation.



MATCHLINE SEE FIGURE 3

MITIGATION TABLE		
#	SQUARE FOOTAGE	MITIGATION
①	118,863	BUFFER ENHANCEMENT
②	78,775	WETLAND RE-ESTABLISHMENT
③	9,747	WETLAND ENHANCEMENT
④	8,712	RESTORED WETLAND
⑤	9,012	RESTORED BUFFER
⑥	52,272	STREAM RESTORATION

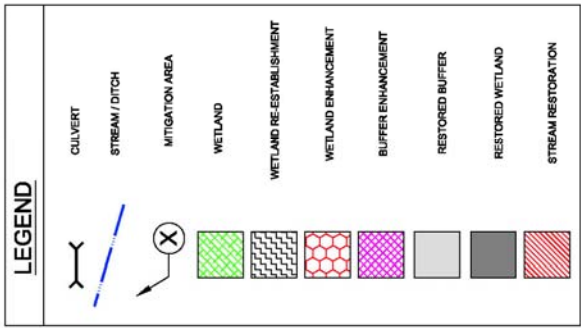


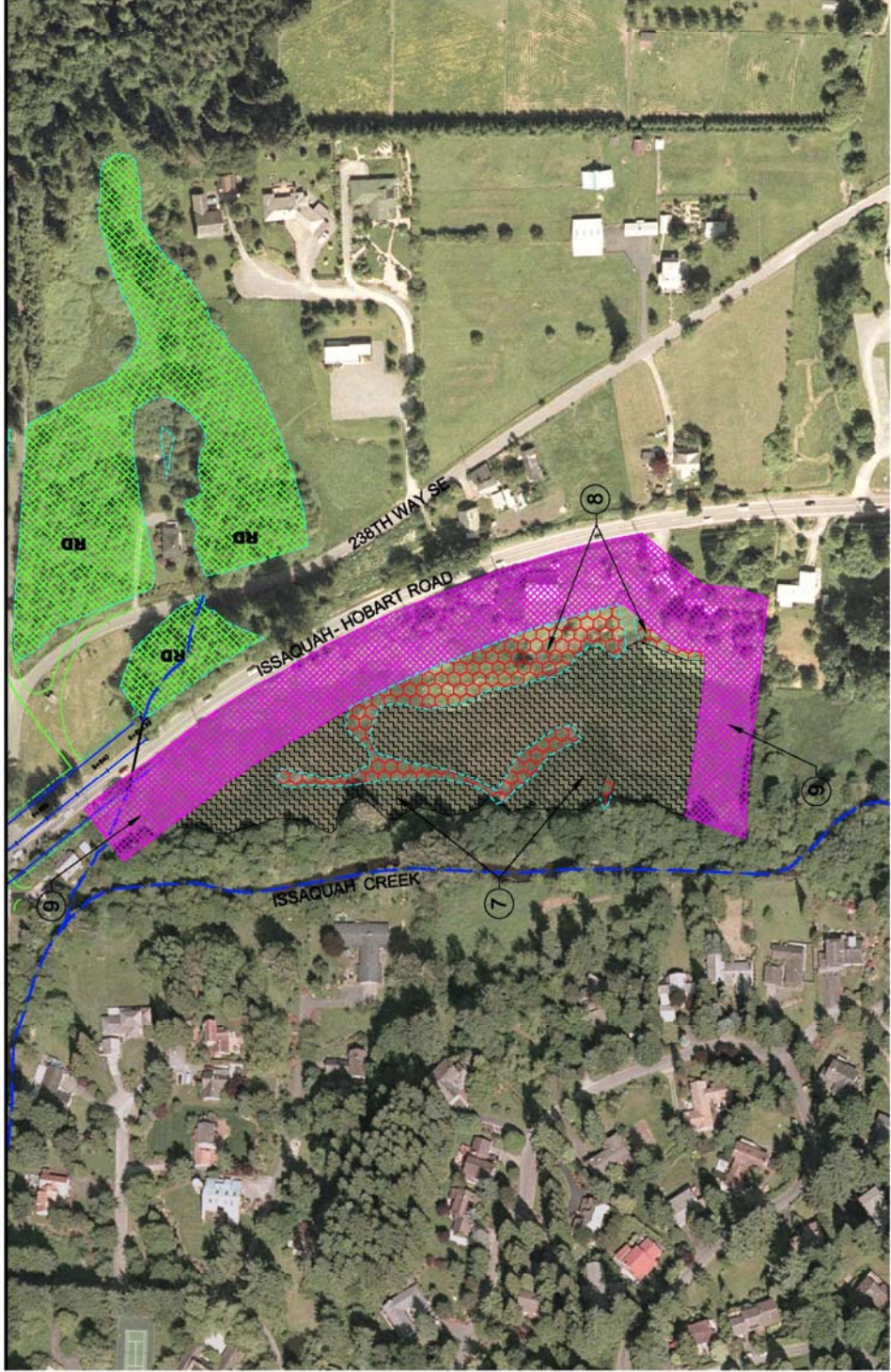
Figure 2. Potential wetland mitigation areas for the SE Issaquah Bypass project, Issaquah, Washington.







MATCHLINE SEE FIGURE 2



MITIGATION TABLE			
#	SQUARE FOOTAGE	ACRES	MITIGATION
7	139,409	3.20	WETLAND RE-ESTABLISHMENT
8	50,568	1.16	WETLAND ENHANCEMENT
9	165,765	3.81	BUFFER ENHANCEMENT

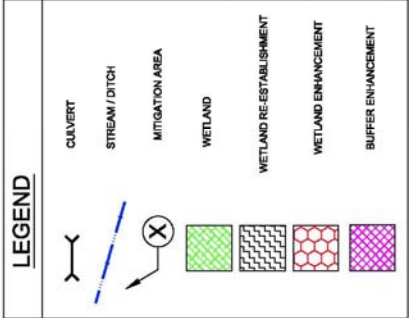


Figure 3. Potential wetland mitigation areas for the SE Issaquah Bypass project, Issaquah, Washington.



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Hruby, T., T. Granger, K. Brunner, S. Cooke, K. Dublanica, R. Gersib, L. Reinelt, K. Richter, D. Sheldon, E. Teachout, A. Wald, and F. Weinmann. 1999. *Methods for Assessing Wetland Functions*. Vol. 1, Riverine and Depressional Wetlands in the Lowlands of Western Washington. Part 1, Assessment Methods. Ecology Publication 99-115. Prepared for Washington State Department of Ecology, Olympia, Washington. July 1999.

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## **ATTACHMENT 1**

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# Department of Ecology Wetland Rating Forms (Hruby 2004)

## WETLAND RATING FORM - WESTERN WASHINGTON

Name of wetland (if known): Wetland GW / VL

Location: SEC: 34 TWNSHP: 24N RNGE: 6E (attach map with outline of wetland rating form)

Person(s) Rating Wetland: KL Affiliation: Herrera Date of site visit: 5/24/2005

### SUMMARY OF RATING

#### Category based on FUNCTIONS provided by wetland

I ☐

II ☒

III ☐

IV ☐

Category I = Score  $\geq 70$

Category II = Score 51-69

Category III = Score 30-50

Category IV = Score  $< 30$

Score for Water Quality Functions 20

Score for Hydrologic Functions 10

Score for Habitat Functions 25

**TOTAL score for functions** 55

#### Category based on SPECIAL CHARACTERISTICS of wetland

I ☐

II ☐

Does not Apply ☒

**Final Category** (choose the "highest" category from above)

**II**

Check the appropriate type and class of wetland being rated.

Wetland Type	
Estuarine	<input type="checkbox"/>
Natural Heritage Wetland	<input type="checkbox"/>
Bog	<input type="checkbox"/>
Mature Forest	<input type="checkbox"/>
Old Growth Forest	<input type="checkbox"/>
Coastal Lagoon	<input type="checkbox"/>
Interdunal	<input type="checkbox"/>
None of the above	<input checked="" type="checkbox"/>

Wetland Class	
Depressional	<input checked="" type="checkbox"/>
Riverine	<input type="checkbox"/>
Lake-fringe	<input type="checkbox"/>
Slope	<input type="checkbox"/>
Flats	<input type="checkbox"/>
Freshwater Tidal	<input type="checkbox"/>

### Does the wetland being rated meet any of the criteria below?

If you answer YES to any of the questions below, you will need to protect the wetland according to the regulations regarding the special characteristics found in the wetland.

Check List for Wetlands That Need Special Protection, and That Are Not Included in the Rating		YES	NO
SP1.	<i>Has the wetland been documented as a habitat for any federally listed Threatened or Endangered (T/E) plant or animal species?</i> For the purposes of this rating system, "documented" means the wetland is on the appropriate state or federal database.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SP2.	<i>Has the wetland been documented as habitat for any state listed Threatened or Endangered plant or animal species?</i> For the purposes of this rating system, "documented" means the wetland is on the appropriate state database.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SP3.	<i>Does the wetland contain individuals of Priority species listed by the WDFW for the state?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SP4.	<i>Does the wetland have a local significance in addition to its functions?</i> For example, the wetland has been identified in the Shoreline Master Program, the Critical Areas Ordinance, or in a local management plan as having special significance.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

To complete the next part of the data sheet, you will need to determine the Hydrogeomorphic Class of the wetland being rated.

The hydrogeomorphic classification groups wetlands into those that function in similar ways. This simplifies the questions needed to answer how well the wetland functions. The Hydrogeomorphic Class of a wetland can be determined using the key below. See p. 24 for more detailed instructions on classifying wetlands.

## Classification of Vegetated Wetlands for Western Washington

Wetland Name: GW / VL

Date: 5/24/2005

1. Are the water levels in the wetland usually controlled by tides (i.e., except during floods)?

☒ NO - go to 2

☐ YES - the wetland class is **Tidal Fringe**

If YES, is the salinity of the water during periods of annual low flow below 0.5 ppt (parts per thousand)?

☐ YES - **Freshwater Tidal Fringe**

☐ NO - **Saltwater Tidal Fringe (Estuarine)**

If your wetland can be classified as a Freshwater Tidal Fringe, use the forms for Riverine wetlands. If it is Saltwater Tidal Fringe, it is rated as an Estuarine wetland. Wetlands that were called estuarine in the first and second editions of the rating system are called Saltwater Tidal Fringe in the Hydrogeomorphic Classification. Estuarine wetlands were categorized separately in the earlier editions, and this separation is being kept in this revision. To maintain consistency between editions, the term "Estuarine" wetland is being kept. Please note, however, that the characteristics that define Category I and II estuarine wetlands have changed (see p. xx).

2. Is the topography within the wetland flat and precipitation is only source (>90%) of water to it?

☒ NO - go to 3

☐ YES - the wetland class is **Flats**

If your wetland can be classified as a "Flats" wetland, use the form for **Depressional** wetlands.

3. Does the wetland **meet both** of the following criteria?

☐ The vegetated part of the wetland is on the shores of a body of open water (without any vegetation on the surface) where at least 20 acres (8 ha) are permanently inundated (ponded or flooded);

☐ At least 30% of the open water area is deeper than 6.6 feet (2 m)?

☒ NO - go to 4

☐ YES - the wetland class is **Lake-fringe (Lacustrine Fringe)**

4. Does the wetland **meet all** of the following criteria?

☐ The wetland is on a slope (*slope can be very gradual*);

☐ The water flows through the wetland in one direction (unidirectional) and usually comes from seeps. It may flow subsurface, as sheetflow, or in a swale without distinct banks.

☐ The water leaves the wetland **without being impounded**?

NOTE: *Surface water does not pond in these type of wetlands except occasionally in very small and shallow depressions or behind hummocks (depressions are usually <3 feet in diameter and less than 1 foot deep).*

☐ NO - go to 5

☒ YES - the wetland class is **Slope**

5. Is the wetland in a valley, or stream channel, where it gets inundated by overbank flooding from that stream or river? The flooding should occur at least once every two years, on the average, to answer "yes." *The wetland can contain depressions that are filled with water when the river is not flooding.*

☒ NO - go to 6

☐ YES - the wetland class is **Riverine**

6. Is the wetland in a topographic depression in which water ponds, or is saturated to the surface, at some time of the year? *This means that any outlet, if present, is higher than the interior of the wetland.*

☐ NO - go to 7

☒ YES - the wetland class is **Depressional**

7. Is the wetland located in a very flat area with no obvious depression and no stream or river running through it and providing water? The wetland seems to be maintained by higher ground water in the area. The wetland may be ditched, but has no obvious natural outlet.

☐ NO - go to 8

☐ YES - the wetland class is **Depressional**

8. Your wetland seems to be difficult to classify. For example, seeps at the base of a slope may grade into a riverine floodplain, or a small stream within a depressional wetland has a zone of flooding along its sides. Sometimes we find characteristics of several different hydrogeomorphic classes within one wetland boundary. Use the following table to identify the appropriate class to use for the rating system if you have several HGM classes present within your wetland. NOTE: Use this table only if the class that is recommended in the second column represents 10% or more of the total area of the wetland being rated. If the area of the second class is less than 10%, classify the wetland using the first class.

<b>HGM Classes Within a Delineated Wetland Boundary</b>	<b>Class to Use in Rating</b>	
Slope + Riverine	Riverine	<input type="checkbox"/>
Slope + Depressional	Depressional	<input checked="" type="checkbox"/>
Slope + Lake-fringe	Lake-fringe	<input type="checkbox"/>
Depressional + Riverine along stream within boundary	Depressional	<input type="checkbox"/>
Depressional + Lake-fringe	Depressional	<input type="checkbox"/>
Saltwater Tidal Fringe and any other class of freshwater wetland	Treat as ESTUARINE under wetlands with special characteristics	<input type="checkbox"/>

If you are unable still to determine which of the above criteria apply to your wetland, or you have more than 2 HGM classes within a wetland boundary, classify the wetland as **Depressional** for the rating.

D Depressional and Flats Wetlands		
WATER QUALITY FUNCTIONS - Indicators that wetland functions to improve water quality.		
<b>D 1.</b>	<b>Does the wetland have the <u>potential</u> to improve water quality? (see p. 38)</b>	<b>Points</b>
D 1.1	Characteristics of surface water flows out of the wetland: <input type="checkbox"/> Wetland is a depression with no surface water outlet. <b>Points = 3</b> <input type="checkbox"/> Wetland has an intermittently flowing, or highly constricted, outlet. <b>Points = 2</b> <input checked="" type="checkbox"/> Wetland has an unconstricted surface outlet. <b>Points = 1</b> <input type="checkbox"/> Wetland is flat and has no obvious outlet and/or outlet is a ditch. <b>Points = 1</b>	1
D 1.2	The soil 2 inches below the surface is clay, organic, or smells anoxic (hydrogen sulfide or rotten eggs): <input checked="" type="checkbox"/> YES <b>Points = 4</b> <input type="checkbox"/> NO <b>Points = 0</b>	4
D 1.3	Characteristics of persistent vegetation (emergent, shrub, and/or forest class): <input checked="" type="checkbox"/> Wetland has persistent, ungrazed vegetation $\leq 95\%$ of area. <b>Points = 5</b> <input type="checkbox"/> Wetland has persistent, ungrazed vegetation $\leq 1/2$ of area. <b>Points = 3</b> <input type="checkbox"/> Wetland has persistent, ungrazed vegetation $\leq 1/10$ of area. <b>Points = 1</b> <input type="checkbox"/> Wetland has persistent, ungrazed vegetation $< 1/10$ of area <b>Points = 0</b>	5
D 1.4	Characteristics of seasonal ponding or inundation. <i>This is the area of the wetland that is ponded for at least 2 months, but dries out sometime during the year. Do not count the area that is permanently ponded. Estimate area as the average condition 5 out of 10 years.</i> <input type="checkbox"/> Area seasonally ponded is $> 1/2$ total area of wetland. <b>Points = 4</b> <input type="checkbox"/> Area seasonally ponded is $> 1/4$ total area of wetland. <b>Points = 2</b> <input checked="" type="checkbox"/> Area seasonally ponded is $< 1/4$ total area of wetland. <b>Points = 0</b> NOTE: See text for indicators of seasonal and permanent inundation.	0
<b>Total for D 1</b>		<i>Add the points in the boxes above</i> 10
<b>D 2.</b>	<b>Does the wetland have the <u>opportunity</u> to improve water quality? (see p. 44)</b> Answer YES if you know or believe there are pollutants in ground water or surface water coming into the wetland that would otherwise reduce water quality in streams, lakes, or ground water downgradient from the wetland. <i>Note which of the following conditions provide the sources of pollutants:</i> <input type="checkbox"/> Grazing in the wetland or within 150 feet. <input type="checkbox"/> Untreated stormwater discharges to wetland. <input type="checkbox"/> Tilled fields or orchards within 150 feet of wetland. <input type="checkbox"/> A stream or culvert discharges into wetland that drains developed areas, residential areas, farmed fields, roads, or clear-cut logging. <input checked="" type="checkbox"/> Residential, urban areas, golf courses are within 150 feet of wetland. <input type="checkbox"/> Wetland is fed by ground water high in phosphorus or nitrogen. <input type="checkbox"/> Other: _____	Multiplier
YES - multiplier is 2		2
NO - multiplier is 1		
<b>TOTAL - Water Quality Functions</b>		Multiply the score from D 1. by D 2. <i>Add score to table on p. 1</i> 20

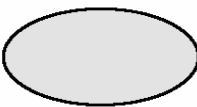
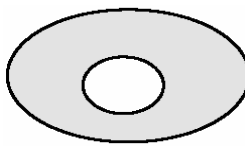
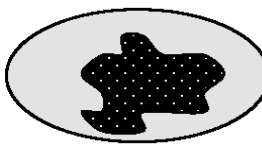
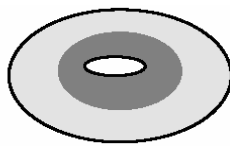



<b>D Depressional and Flats Wetlands</b>		
HYDROLOGIC FUNCTIONS - Indicators that wetland functions to reduce flooding/stream degradation.		
<b>D 3. Does wetland have the <u>potential</u> to reduce flooding/erosion? (see p. 46)</b>	<b>Points</b>	
D 3.1 Characteristics of surface water flows out of the wetland: <input type="checkbox"/> Wetland has no surface water outlet. <b>Points = 4</b> <input type="checkbox"/> Wetland has an intermittently flowing, or highly constricted, outlet. <b>Points = 2</b> <input type="checkbox"/> Wetland is flat and has no obvious outlet and/or outlet is a small ditch. <b>Points = 1</b> <input checked="" type="checkbox"/> Wetland has an unconstricted surface outlet. <b>Points = 0</b>	0	
D 3.2 Depth of storage during wet periods. <i>Estimate the height of ponding above the bottom of the outlet.</i> <input type="checkbox"/> Marks of ponding are 3 feet or more above the surface. <b>Points = 7</b> <input checked="" type="checkbox"/> The wetland is a "headwater" wetland. <b>Points = 5</b> <input type="checkbox"/> Marks of ponding between 2 feet to <3 feet from surface. <b>Points = 5</b> <input type="checkbox"/> Marks are at least 0.5 feet to <2 feet from surface. <b>Points = 3</b> <input type="checkbox"/> Wetland is flat but has small depressions on the surface that trap water. <b>Points = 1</b> <input type="checkbox"/> Marks of ponding less than 0.5 feet. <b>Points = 0</b>	5	
D 3.3 Contribution of wetland to storage in the watershed. <i>Estimate the ratio of the area of upstream basin contributing surface water to the wetland to the area of the wetland itself.</i> <input type="checkbox"/> The area of the basin is <10 times the area of the wetland. <b>Points = 5</b> <input type="checkbox"/> The area of the basin is 10 to 100 times the area of the wetland. <b>Points = 3</b> <input checked="" type="checkbox"/> The area of the basin is >100 times the area of the wetland. <b>Points = 0</b> <input type="checkbox"/> Wetland is in the <b>Flats</b> class (basin = wetland, by definition). <b>Points = 5</b>	0	
<b>Total for D 3</b>	<i>Add the points in the boxes above</i>	<b>5</b>
<b>D 4. Does wetland have the opportunity to reduce flooding/erosion? (see p. 49)</b> Answer YES if the wetland is in a location in the watershed where the flood storage, or reduction in water velocity, helps protect downstream property and aquatic resources from flooding or excessive and/or erosive flows. Answer NO if the water coming into the wetland is controlled by a structure such as flood gate, tide gate, flap valve, reservoir, etc. OR you estimate that more than 90% of the water in the wetland is from ground water. <i>Note which of the following indicators of opportunity apply:</i> <input checked="" type="checkbox"/> Wetland is in a headwater of a river or stream that has flooding problems. <input type="checkbox"/> Wetland drains to a river or stream that has flooding problems. <input type="checkbox"/> Wetland has no outlet and impounds surface runoff water that might otherwise flow into a river or stream that has flooding problems. <input type="checkbox"/> Other: _____		Multiplier 2
YES - multiplier is <b>2</b> NO - multiplier is <b>1</b>		
<b>TOTAL - Hydrologic Functions</b>		Multiply the score from D 3. by D 4. <i>Add score to table on p. 1</i> <b>10</b>



**These questions apply to wetlands of all HGM classes**

**HABITAT FUNCTIONS - Indicators that wetland functions to provide important habitat.**

		Points									
<b>H 1.</b>	<b>Does the wetland have the <u>potential</u> to provide habitat for many species?</b>										
H 1.1	<p><u>Vegetation structure</u> (see p. 72)</p> <p>Check the types of vegetation classes present (as defined by Cowardin) if the class covers more than 10% of the area of the wetland or 1/4 acre.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Aquatic bed</li> <li><input checked="" type="checkbox"/> Emergent plants</li> <li><input checked="" type="checkbox"/> Scrub/shrub (areas where shrubs have &gt;30% cover)</li> <li><input checked="" type="checkbox"/> Forested (areas where trees have &gt;30% cover)</li> <li><input checked="" type="checkbox"/> Forested areas have 3 out of 5 strata (canopy, sub-canopy, shrubs, herbaceous, moss/ground-cover)</li> </ul> <p>Add the number of vegetation types that qualify. If you have:</p> <table style="width: 100%;"> <tr> <td style="text-align: right;">4 types or more</td> <td style="text-align: right;"><b>Points = 4</b></td> </tr> <tr> <td style="text-align: right;">3 types</td> <td style="text-align: right;"><b>Points = 2</b></td> </tr> <tr> <td style="text-align: right;">2 types</td> <td style="text-align: right;"><b>Points = 1</b></td> </tr> <tr> <td style="text-align: right;">1 type</td> <td style="text-align: right;"><b>Points = 0</b></td> </tr> </table>	4 types or more	<b>Points = 4</b>	3 types	<b>Points = 2</b>	2 types	<b>Points = 1</b>	1 type	<b>Points = 0</b>	4	
4 types or more	<b>Points = 4</b>										
3 types	<b>Points = 2</b>										
2 types	<b>Points = 1</b>										
1 type	<b>Points = 0</b>										
H 1.2	<p><u>Hydroperiods</u> (see p. 73)</p> <p>Check the types of water regimes (hydroperiods) present within the wetland. The water regime has to cover more than 10% of the wetland or 1/4 acre to count (see text for descriptions of hydroperiods).</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Permanently flooded or inundated</li> <li><input type="checkbox"/> Seasonally flooded or inundated</li> <li><input type="checkbox"/> Occasionally flooded or inundated</li> <li><input checked="" type="checkbox"/> Saturated only</li> <li><input checked="" type="checkbox"/> Permanently flowing stream or river in, or adjacent to, the wetland</li> <li><input type="checkbox"/> Seasonally flowing stream in, or adjacent to, the wetland</li> <li><input type="checkbox"/> <b>Lake-fringe wetland = 2 points</b></li> <li><input type="checkbox"/> <b>Freshwater tidal wetland = 2 points</b></li> </ul> <table style="width: 100%;"> <tr> <td style="text-align: right;">4 or more types present</td> <td style="text-align: right;"><b>Points = 3</b></td> </tr> <tr> <td style="text-align: right;">3 types present</td> <td style="text-align: right;"><b>Points = 2</b></td> </tr> <tr> <td style="text-align: right;">2 types present</td> <td style="text-align: right;"><b>Points = 1</b></td> </tr> </table>	4 or more types present	<b>Points = 3</b>	3 types present	<b>Points = 2</b>	2 types present	<b>Points = 1</b>	2			
4 or more types present	<b>Points = 3</b>										
3 types present	<b>Points = 2</b>										
2 types present	<b>Points = 1</b>										
H 1.3	<p><u>Richness of Plant Species</u> (see p. 75)</p> <p>Count the number of plant species in the wetland that cover at least 10 sq. ft. (different patches of the same species can be combined to meet the size threshold). You do not have to name the species. Do not include Eurasian Milfoil, reed canarygrass, purple loosestrife, Canadian Thistle.</p> <table style="width: 100%;"> <tr> <td style="text-align: right;">If you counted:</td> <td style="text-align: right;">&gt;19 species</td> <td style="text-align: right;"><b>Points = 2</b></td> </tr> <tr> <td></td> <td style="text-align: right;">5-19 species</td> <td style="text-align: right;"><b>Points = 1</b></td> </tr> <tr> <td></td> <td style="text-align: right;">&lt;5 species</td> <td style="text-align: right;"><b>Points = 0</b></td> </tr> </table> <p>List species below if you want to:</p>	If you counted:	>19 species	<b>Points = 2</b>		5-19 species	<b>Points = 1</b>		<5 species	<b>Points = 0</b>	2
If you counted:	>19 species	<b>Points = 2</b>									
	5-19 species	<b>Points = 1</b>									
	<5 species	<b>Points = 0</b>									

H 1.4	<p><b>Interspersion of Habitats</b> (<i>see p. 76</i>)</p> <p>Decide from the diagrams below whether interspersion between types of vegetation (described in H 1.1) or vegetation types and unvegetated areas (can include open water or mudflats) is high, medium, low, or none.</p> <div style="text-align: center;">     </div> <p>None = 0 points      Low = 1 point      Moderate = 2 points</p> <div style="text-align: center;">    </div> <p>High = 3 points</p> <p>[riparian braided channels]</p> <p>NOTE: If you have four or more vegetation types or three vegetation types and open water, the rating is always "high".</p>	<table border="1"> <tr> <th>Points</th> </tr> <tr> <td>2</td> </tr> </table>	Points	2
Points				
2				
H 1.5	<p><b>Special Habitat Features</b> (<i>see p. 77</i>)</p> <p>Check the habitat features that are present in the wetland. The number of checks is the number of points you put into the next column.</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Large, downed, woody debris within the wetland (&gt;4 inch in diameter and 6 feet long).</li> <li><input checked="" type="checkbox"/> Standing snags (diameter at the bottom &gt;4 inches) in the wetland.</li> <li><input type="checkbox"/> Undercut banks are present for at least 6.6 feet (2 m) and/or overhanging vegetation extends at least 3.3 feet (1 m) over a stream for at least 33 feet (10 m).</li> <li><input type="checkbox"/> Stable steep banks of fine material that might be used by beaver/muskrat for denning (&gt;30° slope) OR signs of recent beaver activity are present.</li> <li><input type="checkbox"/> At least 1/4 acre of thin-stemmed persistent vegetation or woody branches are present in areas that are permanently or seasonally inundated (<i>structures for egg-laying by amphibians</i>).</li> <li><input checked="" type="checkbox"/> Invasive plants cover less than 25% of the wetland area in each stratum of plants.</li> </ul>	<table border="1"> <tr> <td>3</td> </tr> </table>	3	
3				
<p align="center"><b>H 1. TOTAL</b> Score - potential for providing habitat Add the scores in the column above</p>		<table border="1"> <tr> <td>13</td> </tr> </table>	13	
13				
<p>Comments:</p>				

H 2. Does the wetland have the opportunity to provide habitat for many species?		Points
H 2.1	<p><u>Buffers</u> (see p. 80)</p> <p>Choose the description that best represents condition of buffer of wetland. The highest scoring criterion that applies to the wetland is to be used in the rating. See text for definition of "undisturbed."</p> <p><input type="checkbox"/> 100 m (330 feet) of relatively undisturbed vegetated areas, rocky areas, or open water &gt;95% of circumference. No developed areas within undisturbed part of buffer (<b>relatively undisturbed also means no grazing</b>). <b>Points = 5</b></p> <p><input checked="" type="checkbox"/> 100 m (330 feet) of relatively undisturbed vegetated areas, rocky areas, or open water &gt;50% of circumference. <b>Points = 4</b></p> <p><input type="checkbox"/> 50 m (170 feet) of relatively undisturbed vegetated areas, rocky areas, or open water &gt;95% circumference. <b>Points = 4</b></p> <p><input type="checkbox"/> 100 m (330 feet) of relatively undisturbed vegetated areas, rocky areas, or open water for &gt;25% circumference. <b>Points = 3</b></p> <p><input type="checkbox"/> 50 m (170 feet) of relatively undisturbed vegetated areas, rocky areas, or open water for &gt;50% circumference. <b>Points = 3</b></p> <p><b>If buffer does not meet any of the criteria above:</b></p> <p><input type="checkbox"/> No paved areas (except paved trails) or buildings within 25 m (80 feet) of wetland &gt;95% circumference. Light to moderate grazing, or lawns are OK. <b>Points = 2</b></p> <p><input type="checkbox"/> No paved areas or buildings within 50 m of wetland for &gt;50% circumference. Light to moderate grazing, or lawns are OK. <b>Points = 2</b></p> <p><input type="checkbox"/> Heavy grazing in buffer. <b>Points = 1</b></p> <p><input type="checkbox"/> Vegetated buffers are &lt;2 m wide (6.6 feet) for more than 95% of the circumference (e.g., tilled fields, paving, basalt bedrock extend to edge of wetland). <b>Points = 0</b></p> <p><input type="checkbox"/> Buffer does not meet any of the criteria above. <b>Points = 1</b></p>	4
H 2.2	<p><u>Corridors and Connections</u> (see p. 81)</p> <p>H 2.2.1 Is the wetland part of a relatively undisturbed/unbroken vegetated corridor (riparian or upland) at least 150 feet wide, has at least 30% cover of shrubs, forest, or native undisturbed prairie, that connects to estuaries, other wetlands, or undisturbed uplands that are at least 250 acres in size? (<i>Dams in riparian corridors, heavily used gravel roads, and paved roads are considered breaks in the corridor.</i>)</p> <p>YES = 4 points (go to H 2.3) NO = go to H 2.2.2</p> <p>H 2.2.2 Is the wetland part of a relatively undisturbed/unbroken vegetated corridor (either riparian or upland) at least 50 feet wide, has at least 30% cover of shrubs or forest, and connects to estuaries, other wetlands, or undisturbed uplands that are at least 25 acres in size <b>OR</b> a <b>Lake-fringe</b> wetland, if it does not have an undisturbed corridor as in the question above?</p> <p>YES = 2 points (go to H 2.3) NO = go to H 2.2.3</p> <p>H 2.2.3 Is the wetland:</p> <p>– within 5 miles (8 km) of a brackish or salt water estuary <b>OR</b> within 3 miles of a large field or pasture (&gt;40 acres) <b>OR</b> within 1 mile of a lake greater than 20 acres?</p> <p>YES = 1 point NO = 0 points</p>	4

H 2.3	Near or Adjacent to Other Priority Habitats Listed by WDFW ( <i>see p. 82</i> )	Points
	<p>Which of the following priority habitats are within 330 feet (100 m) of the wetland? (<i>See text for a more detailed description of these priority habitats.</i> )</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>Riparian:</b> Area adjacent to aquatic systems with flowing water that contains elements of both aquatic and terrestrial ecosystems which mutually influence each other.</li> <li><input type="checkbox"/> <b>Aspen stands:</b> Pure or mixed stands of aspen &gt;0.8 ha (2 acres).</li> <li><input type="checkbox"/> <b>Cliffs:</b> Greater than 7.6 m (25 feet) high and occurring below 5,000 feet.</li> <li><input type="checkbox"/> <b>Old-growth forests:</b> (old growth west of Cascade crest) Stands of at least 2 tree species, forming a multi-layered canopy with occasional small openings; with at least 20 trees/ha (8/acre) &gt;81 cm (32 inches) in diameter or &gt;200 years of age.</li> <li><input type="checkbox"/> <b>Mature forests:</b> Stands with average diameters exceeding 53 cm (21 inches) dbh; crown cover may be &lt;100%; decay, decadence, numbers of snags, and quantity of large downed material is generally less than found in old-growth; 80-200 years old west of Cascade crest.</li> <li><input type="checkbox"/> <b>Prairies:</b> Relatively undisturbed areas (indicated by dominance of native plants) where grasses/forbs form the natural climax plant community.</li> <li><input type="checkbox"/> <b>Talus:</b> Homogenous areas of rock rubble (average size 0.15 - 2.0 m [0.5 - 65 feet]), composed of basalt, andesite, and/or sedimentary rock, including riprap slides and mine tailings. May be associated with cliffs.</li> <li><input type="checkbox"/> <b>Caves:</b> Naturally occurring cavity, recess, void, or system of interconnected passages.</li> <li><input type="checkbox"/> <b>Oregon white oak:</b> Woodland stands of pure oak or oak/conifer associations where canopy coverage of the oak component is 25%.</li> <li><input type="checkbox"/> <b>Urban Natural Open Space:</b> A priority species resides within or is adjacent to the open space and uses it for breeding and/or regular feeding; and/or the open space functions as a corridor connecting other <i>priority habitats</i> , especially those otherwise isolated; and/or the open space is an isolated remnant of natural habitat &gt;4 ha (10 acres) and is surrounded by urban development.</li> <li><input type="checkbox"/> <b>Estuary/estuary-like:</b> Deepwater tidal habitats &amp; adjacent tidal wetlands, usually semi-enclosed by land but with open, partly obstructed, or sporadic access to open ocean; ocean water at least occasionally diluted by freshwater runoff from land. Salinity may be periodically increased above that of open ocean by evaporation. Along some low-energy coastlines, there is appreciable dilution of sea water. Estuarine habitat extends upstream and landward to where ocean-derived salts measure &lt;0.5 ppt. during period of avg. annual low flow. Includes both estuaries and lagoons.</li> <li><input type="checkbox"/> <b>Marine/estuarine shorelines:</b> Include intertidal and subtidal zones of beaches; may also include backshore and adjacent components of the terrestrial landscape (e.g., cliffs, snags, mature trees, dunes, meadows) important to shoreline associated fish and wildlife and that contribute to shoreline function (e.g., sand/rock/log recruitment, nutrient contribution, erosion control).</li> </ul>	1
If wetland has:	<b>3+ priority habitats = 4 points</b> <b>2 priority habitats = 3 points</b>	<b>1 priority habitat = 1 point</b> <b>No habitats = 0 points</b>

H 2.4	<b>Wetland Landscape (<i>see p. 84</i>)</b> Choose the <b>one</b> description of the landscape around the wetland that best fits.	<b>Points</b>
<input type="checkbox"/> There are at least 3 other wetlands within 1/2 mile, and the connections between them are relatively undisturbed (light grazing between wetlands OK, as is lake shore with some boating, but connections should NOT be bisected by paved roads, fill, fields, or other development).	<b>Points = 5</b>	3
<input type="checkbox"/> The wetland is Lake-fringe on a lake with little disturbance and there are 3 other Lake-fringe wetlands within 1/2 mile.	<b>Points = 5</b>	
<input checked="" type="checkbox"/> There are at least 3 other wetlands within 1/2 mile, BUT the connections between them are disturbed.	<b>Points = 3</b>	
<input type="checkbox"/> The wetland is Lake-fringe on a lake <b>with</b> disturbance, and there are 3 other Lake-fringe wetlands within 1/2 mile.	<b>Points = 3</b>	
<input type="checkbox"/> There is at least 1 wetland within 1/2 mile.	<b>Points = 2</b>	
<input type="checkbox"/> There are no wetlands within 1/2 mile.	<b>Points = 0</b>	
<b>H 2. TOTAL Score - opportunity for providing habitat</b> <i>Add the scores in the column above</i>		12
<b>Total Score for Habitat Functions - add the points for H 1, H2, and record the result on p. 1</b>		25

## CATEGORIZATION BASED ON SPECIAL CHARACTERISTICS

*Please determine if the wetland meets the attributes described below and choose the appropriate answers and Category.*

Wetland Type		Category
Check off any criteria that apply to the wetland. Check the appropriate Category when the appropriate criteria are met.		
SC 1.	<p><u>Estuarine Wetlands</u> (see p. 86)</p> <p>Does the wetland meet the following criteria for Estuarine wetlands?</p> <p><input type="checkbox"/> The dominant water regime is tidal,</p> <p><input type="checkbox"/> Vegetated, and</p> <p><input type="checkbox"/> With a salinity greater than 0.5 ppt.</p> <p><input type="checkbox"/> YES = <i>Go to SC 1.1</i> <input checked="" type="checkbox"/> NO</p>	
SC 1.1	<p>Is the wetland within a National Wildlife Refuge, National Park, National Estuary Reserve, Natural Area Preserve, State Park, or Educational, Environmental, or Scientific Reserve designated under WAC 332-30-151?</p> <p><input type="checkbox"/> YES = <b>Category I</b> <input type="checkbox"/> NO = <i>Go to SC 1.2</i></p>	
SC 1.2	<p>Is the wetland at least 1 acre in size and meets at least two of the following three conditions?</p> <p><input type="checkbox"/> The wetland is relatively undisturbed (has no diking, ditching, filling, cultivation, grazing, and has &lt;10% cover of non-native plant species. If the non-native <i>Spartina</i> spp. are the only species that cover &gt;10% of the wetland, then the wetland should be given a dual rating (I/II). The area of <i>Spartina</i> would be rated a Category II while the relatively undisturbed upper marsh with native species would be a Category I. Do not, however, exclude the area of <i>Spartina</i> in determining the size threshold of 1 acre.</p> <p><input type="checkbox"/> At least 3/4 of the landward edge of the wetland has a 100 foot buffer of shrub, forest, or ungrazed or unmowed grassland.</p> <p><input type="checkbox"/> The wetland has at least two of the following features: tidal channels, depressions with open water, or contiguous freshwater wetlands.</p> <p><input type="checkbox"/> YES = <b>Category I</b> <input type="checkbox"/> NO = <b>Category II</b></p>	

<b>SC 2.</b>	<u>Natural Heritage Wetlands</u> ( <i>see p. 87</i> ) Natural Heritage wetlands have been identified by the Washington Natural Heritage Program/DNR as either high quality undisturbed wetlands or wetlands that support state Threatened, Endangered, or Sensitive plant species.	<b>Category</b>
SC 2.1	Is the wetland being rated in a Section/Township/Range that contains a Natural Heritage wetland? (This question is used to screen out most sites before you need to contact WNHP/DNR.)  S/T/R information from Appendix D <input checked="" type="checkbox"/> or accessed from WNHP/DNR web site <input checked="" type="checkbox"/> <input type="checkbox"/> YES - contact WNHP/DNR ( <i>see p. 79</i> ) and go to SC 3.2 <input checked="" type="checkbox"/> NO	
SC 2.2	Has DNR identified the wetland as a high quality undisturbed wetland or as a site with state Threatened or Endangered plant species?  <input type="checkbox"/> YES = <b>Category I</b> <input checked="" type="checkbox"/> NO	
<b>SC 3.</b>	<u>Bogs</u> ( <i>see p. 87</i> ) Does the wetland (or part of the wetland) meet both the criteria for soils and vegetations in bogs? <i>Use the key below to identify if the wetland is a bog. If you answer Yes, you will still need to rate the wetland based on its function.</i>  1. Does wetland have organic soil horizons (i.e., layers of organic soil), either peats or mucks, that compose 16 inches or more of the first 32 inches of the soil profile? (See Appendix B for a field key to identify organic soils.) <input type="checkbox"/> YES - go to Q. 3 <input checked="" type="checkbox"/> NO - go to Q. 2  2. Does the wetland have organic soils, either peats or mucks, that are <16 inches deep over bedrock, or an impermeable hardpan such as clay or volcanic ash, or that are floating on a lake or pond? <input type="checkbox"/> YES - go to Q. 3 <input type="checkbox"/> NO - is not a bog for purpose of rating  3. Does wetland have more than 70% cover of mosses at ground level, AND other plants, if present, consist of the "bog" species listed in Table 3 as a significant component of the vegetation (>30% of total shrub and herbaceous cover consists of species in Table 3)? <input type="checkbox"/> YES - is a bog for purpose of rating <input type="checkbox"/> NO - go to Q. 4 NOTE: If you are uncertain about the extent of mosses in the understory you may substitute that criterion by measuring the pH of the water that seeps into a hole dug at least 16" deep. If the pH is less than 5.0 and the "bog" plant species in Table 3 are present, the wetland is a bog.  4. Is wetland forested (>30% cover) with sitka spruce, subalpine fir, western redcedar, western hemlock, lodgepole pine, quaking aspen, Englemann's spruce, or western white pine, WITH any of the species (or combination of species) on bog species plant list in Table 3 as a significant component of the ground cover (>30% coverage of total shrub/herbaceous cover)?  <input type="checkbox"/> YES - <b>Category I</b> <input type="checkbox"/> NO - is not a bog for purpose of rating	

		Category
SC 4.	<p><u>Forested Wetlands (see p. 90)</u></p> <p>Does the wetland have at least 1 acre of forest that meets one of these criteria for the Department of Fish and Wildlife's forests as priority habitat? <i>If you answer Yes, you will still need to rate the wetland based on its functions.</i></p> <p><input type="checkbox"/> <b>Old-growth forests:</b> (west of Cascade Crest) Stands of at least 2 tree species, forming a multi-layered canopy with occasional small openings; with at least 8 trees/acre (20/hectare) that are at least 200 years of age OR have a diameter at breast height (dbh) of 32 inches (81 cm) or more.</p> <p style="padding-left: 40px;">NOTE: The criterion for dbh is based on measurements for upland forests. 200-year-old trees in wetlands will often have a smaller dbh because their growth rates are often smaller. The DFW criterion is an "OR" so old-growth forests do not necessarily have to have trees of this diameter.</p> <p><input type="checkbox"/> <b>Mature forests:</b> (west of the Cascade Crest) Stands where the largest trees are 80 - 200 years old OR have average diameters (dbh) exceeding 21 inches (53 cm); crown cover may be less than 100%; decay, decadence, numbers of snags, and quantity of large downed material is generally less than that found in old-growth.</p> <p><input type="checkbox"/> YES = <b>Category I</b> <span style="margin-left: 100px;"><input checked="" type="checkbox"/> NO</span></p>	
SC 5.	<p><u>Wetlands in Coastal Lagoons (see p. 91)</u></p> <p>Does the wetland meet all of the following criteria of a wetland in a coastal lagoon?</p> <p><input type="checkbox"/> The wetland lies in a depression adjacent to marine waters that is wholly or partially separated from marine waters by sandbanks, gravel banks, shingle, or, less frequently, rocks.</p> <p><input type="checkbox"/> The lagoon in which the wetland is located contains surface water that is saline or brackish (&gt;.5 ppt) during most of the year in at least a portion of the lagoon (<i>needs to be measured near the bottom</i>).</p> <p><input type="checkbox"/> YES = <i>go to SC 5.1</i> <span style="margin-left: 100px;"><input checked="" type="checkbox"/> NO - not a wetland in a coastal lagoon</span></p>	
SC 5.1	<p>Does the wetland meet all of the following 3 conditions?</p> <p><input type="checkbox"/> The wetland is relatively undisturbed (has no diking, ditching, filling, cultivation, grazing), and has less than 20% cover of invasive plant species (see list of invasive species on p. 74).</p> <p><input type="checkbox"/> At least 3/4 of the landward edge of the wetland has a 100 foot buffer of shrub, forest, or ungrazed or unmowed grassland.</p> <p><input type="checkbox"/> The wetland is larger than 1/10 acre (4,350 square feet).</p> <p><input type="checkbox"/> YES = <b>Category I</b> <span style="margin-left: 100px;"><input type="checkbox"/> NO = <b>Category II</b></span></p>	



<p><b>SC 6. Interdunal Wetlands (<i>see p. 93</i>)</b>          Is the wetland west of the 1889 line (also called the Western Boundary of Upland Ownership or WBUO)?</p> <p><input type="checkbox"/> YES - <i>go to SC 6.1</i>                      <input checked="" type="checkbox"/> NO - not an interdunal wetland for rating</p> <p><b><i>If you answer Yes, you will still need to rate the wetland based on its functions.</i></b></p> <p>In practical terms, that means the following geographic areas:</p> <ul style="list-style-type: none"> <li>• Long Beach Peninsula - lands west of SR 103</li> <li>• Grayland-Westport - lands west of SR 105</li> <li>• Ocean Shores-Copalis - lands west of SR 1115 and SR 109.</li> </ul> <p>SC 6.1 Is wetland 1 acre or larger, or is it in a mosaic of wetlands that is 1 acre or larger?  <input type="checkbox"/> YES = <b>Category II</b>                      <input type="checkbox"/> NO - <i>go to SC 6.2</i></p> <p>SC 6.2 Is the wetland between 0.1 and 1 acre, or is it in a mosaic of wetlands that is between 0.1 and 1 acre?  <input type="checkbox"/> YES = <b>Category III</b></p>	<p><b>Category</b></p>
<p><b>Category of wetland based on Special Characteristics</b>          Choose the "highest" rating if wetland falls into several categories, and record on p. 1.          If you answered NO for all types, enter "Not Applicable" on p. 1.</p>	

## WETLAND RATING FORM - WESTERN WASHINGTON

Name of wetland (if known): Hope Property

Location: SEC: 34 TOWNSHIP: 24N RANGE: 6E (attach map with outline of wetland rating form)

Person(s) Rating Wetland: GI, JW Affiliation: Herrera Date of site visit: 1/11/2005

### SUMMARY OF RATING

#### Category based on FUNCTIONS provided by wetland

I ☐

II ☒

III ☐

IV ☐

Category I = Score  $\geq 70$

Category II = Score 51-69

Category III = Score 30-50

Category IV = Score  $< 30$

Score for Water Quality Functions 20

Score for Hydrologic Functions 22

Score for Habitat Functions 20

**TOTAL score for functions** 62

#### Category based on SPECIAL CHARACTERISTICS of wetland

I ☐

II ☐

Does not Apply ☒

**Final Category** (choose the "highest" category from above)

**II**

Check the appropriate type and class of wetland being rated.

Wetland Type	
Estuarine	<input type="checkbox"/>
Natural Heritage Wetland	<input type="checkbox"/>
Bog	<input type="checkbox"/>
Mature Forest	<input type="checkbox"/>
Old Growth Forest	<input type="checkbox"/>
Coastal Lagoon	<input type="checkbox"/>
Interdunal	<input type="checkbox"/>
None of the above	<input checked="" type="checkbox"/>

Wetland Class	
Depressional	<input type="checkbox"/>
Riverine	<input checked="" type="checkbox"/>
Lake-fringe	<input type="checkbox"/>
Slope	<input type="checkbox"/>
Flats	<input type="checkbox"/>
Freshwater Tidal	<input type="checkbox"/>

**Does the wetland being rated meet any of the criteria below?**

If you answer YES to any of the questions below, you will need to protect the wetland according to the regulations regarding the special characteristics found in the wetland.

Check List for Wetlands That Need Special Protection, and That Are Not Included in the Rating		YES	NO
SP1.	<i>Has the wetland been documented as a habitat for any federally listed Threatened or Endangered (T/E) plant or animal species?</i> For the purposes of this rating system, "documented" means the wetland is on the appropriate state or federal database.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SP2.	<i>Has the wetland been documented as habitat for any state listed Threatened or Endangered plant or animal species?</i> For the purposes of this rating system, "documented" means the wetland is on the appropriate state database.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SP3.	<i>Does the wetland contain individuals of Priority species listed by the WDFW for the state?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SP4.	<i>Does the wetland have a local significance in addition to its functions?</i> For example, the wetland has been identified in the Shoreline Master Program, the Critical Areas Ordinance, or in a local management plan as having special significance.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

To complete the next part of the data sheet, you will need to determine the Hydrogeomorphic Class of the wetland being rated.

The hydrogeomorphic classification groups wetlands into those that function in similar ways. This simplifies the questions needed to answer how well the wetland functions. The Hydrogeomorphic Class of a wetland can be determined using the key below. See p. 24 for more detailed instructions on classifying wetlands.

## Classification of Vegetated Wetlands for Western Washington

Wetland Name: Hope Property

Date: 1/11/2005

1. Are the water levels in the wetland usually controlled by tides (i.e., except during floods)?

☒ NO - go to 2

☐ YES - the wetland class is **Tidal Fringe**

If YES, is the salinity of the water during periods of annual low flow below 0.5 ppt (parts per thousand)?

☐ YES - **Freshwater Tidal Fringe**

☐ NO - **Saltwater Tidal Fringe (Estuarine)**

If your wetland can be classified as a Freshwater Tidal Fringe, use the forms for Riverine wetlands. If it is Saltwater Tidal Fringe, it is rated as an Estuarine wetland. Wetlands that were called estuarine in the first and second editions of the rating system are called Saltwater Tidal Fringe in the Hydrogeomorphic Classification. Estuarine wetlands were categorized separately in the earlier editions, and this separation is being kept in this revision. To maintain consistency between editions, the term "Estuarine" wetland is being kept. Please note, however, that the characteristics that define Category I and II estuarine wetlands have changed (see p. xx).

2. Is the topography within the wetland flat and precipitation is only source (>90%) of water to it?

☒ NO - go to 3

☐ YES - the wetland class is **Flats**

If your wetland can be classified as a "Flats" wetland, use the form for **Depressional** wetlands.

3. Does the wetland **meet both** of the following criteria?

☐ The vegetated part of the wetland is on the shores of a body of open water (without any vegetation on the surface) where at least 20 acres (8 ha) are permanently inundated (ponded or flooded);

☐ At least 30% of the open water area is deeper than 6.6 feet (2 m)?

☒ NO - go to 4

☐ YES - the wetland class is **Lake-fringe (Lacustrine Fringe)**

4. Does the wetland **meet all** of the following criteria?

☐ The wetland is on a slope (*slope can be very gradual*);

☐ The water flows through the wetland in one direction (unidirectional) and usually comes from seeps. It may flow subsurface, as sheetflow, or in a swale without distinct banks.

☐ The water leaves the wetland **without being impounded**?

NOTE: *Surface water does not pond in these type of wetlands except occasionally in very small and shallow depressions or behind hummocks (depressions are usually <3 feet in diameter and less than 1 foot deep).*

☒ NO - go to 5

☐ YES - the wetland class is **Slope**

5. Is the wetland in a valley, or stream channel, where it gets inundated by overbank flooding from that stream or river? The flooding should occur at least once every two years, on the average, to answer "yes." *The wetland can contain depressions that are filled with water when the river is not flooding.*

☐ NO - go to 6

☒ YES - the wetland class is **Riverine**

6. Is the wetland in a topographic depression in which water ponds, or is saturated to the surface, at some time of the year? *This means that any outlet, if present, is higher than the interior of the wetland.*

☐ NO - go to 7

☐ YES - the wetland class is **Depressional**

7. Is the wetland located in a very flat area with no obvious depression and no stream or river running through it and providing water? The wetland seems to be maintained by higher ground water in the area. The wetland may be ditched, but has no obvious natural outlet.

☐ NO - go to 8

☐ YES - the wetland class is **Depressional**

8. Your wetland seems to be difficult to classify. For example, seeps at the base of a slope may grade into a riverine floodplain, or a small stream within a depressional wetland has a zone of flooding along its sides. Sometimes we find characteristics of several different hydrogeomorphic classes within one wetland boundary. Use the following table to identify the appropriate class to use for the rating system if you have several HGM classes present within your wetland. NOTE: Use this table only if the class that is recommended in the second column represents 10% or more of the total area of the wetland being rated. If the area of the second class is less than 10%, classify the wetland using the first class.

<b><i>HGM Classes Within a Delineated Wetland Boundary</i></b>	<b><i>Class to Use in Rating</i></b>	
Slope + Riverine	Riverine	<input type="checkbox"/>
Slope + Depressional	Depressional	<input type="checkbox"/>
Slope + Lake-fringe	Lake-fringe	<input type="checkbox"/>
Depressional + Riverine along stream within boundary	Depressional	<input type="checkbox"/>
Depressional + Lake-fringe	Depressional	<input type="checkbox"/>
Saltwater Tidal Fringe and any other class of freshwater wetland	Treat as ESTUARINE under wetlands with special characteristics	<input type="checkbox"/>

If you are unable still to determine which of the above criteria apply to your wetland, or you have more than 2 HGM classes within a wetland boundary, classify the wetland as **Depressional** for the rating.

R Riverine and Freshwater Tidal Fringe Wetlands		
WATER QUALITY FUNCTIONS - Indicators that wetland functions to improve water quality.		
<b>R 1.</b>	<b>Does the wetland have the <u>potential</u> to improve water quality? (see p. 52)</b>	<b>Points</b>
R 1.1	Area of surface depressions within the riverine wetland that can trap sediments during a flooding event: <input type="checkbox"/> Depressions cover >3/4 area of wetland. <b>Points = 8</b> <input checked="" type="checkbox"/> Depressions cover >1/2 area of wetland. <b>Points = 4</b> <input type="checkbox"/> Depressions present, but cover <1/2 area of wetland. <b>Points = 2</b> <input type="checkbox"/> No depressions present. <b>Points = 0</b>	4
R 1.2	Characteristics of the vegetation in the wetland: <input type="checkbox"/> Forest or shrub >2/3 the area of the wetland. <b>Points = 8</b> <input checked="" type="checkbox"/> Forest or shrub >1/3 the area of the wetland. <b>Points = 6</b> <input type="checkbox"/> Ungrazed, emergent plants >2/3 the area of the wetland. <b>Points = 6</b> <input type="checkbox"/> Ungrazed, emergent plants >1/3 the area of the wetland. <b>Points = 3</b> <input type="checkbox"/> Forest, shrub, and ungrazed emergent <1/3 area of wetland. <b>Points = 0</b>	6
<b>Total for R 1</b>		<i>Add the points in the boxes above</i> 10
<b>R 2.</b>	<b>Does the wetland have the <u>opportunity</u> to improve water quality? (see p. 53)</b> Answer YES if you know or believe there are pollutants in ground water or surface water coming into the wetland that would otherwise reduce water quality in streams, lakes, or ground water downgradient from the wetland. <i>Note which of the following conditions provide the sources of pollutants:</i> <input type="checkbox"/> Grazing in the wetland or within 150 feet. <input checked="" type="checkbox"/> Untreated stormwater discharges to wetland. <input type="checkbox"/> Tilled fields or orchards within 150 feet of wetland. <input checked="" type="checkbox"/> A stream or culvert discharges into wetland that drains developed areas, residential areas, farmed fields, roads, or clear-cut logging. <input checked="" type="checkbox"/> Residential, urban areas, golf courses are within 150 feet of wetland. <input checked="" type="checkbox"/> The river or stream linked to the wetland has a contributing basin where human activities have raised levels of sediment, toxic compounds, or nutrients in the river water above standards for water quality. <input type="checkbox"/> Other: _____ YES - multiplier is <b>2</b> NO - multiplier is <b>1</b>	<b>Multiplier</b> 2
<b>TOTAL - Water Quality Functions</b>		Multiply the score from R 1. by R 2. <i>Add score to table on p. 1</i> 20
Comments:		

**HYDROLOGIC FUNCTIONS** - Indicators that wetland functions to reduce flooding and stream erosion.

## Points

<input type="checkbox"/>	If the ratio is more than 20:	<b>Points = 9</b>
<input type="checkbox"/>	If the ratio is between 10 - 20:	<b>Points = 6</b>
<input checked="" type="checkbox"/>	If the ratio is 5 - <10:	<b>Points = 4</b>
<input type="checkbox"/>	If the ratio is 1 - <5:	<b>Points = 2</b>
<input type="checkbox"/>	If the ratio is <1:	<b>Points = 1</b>

4

<input checked="" type="checkbox"/>	Forest or shrub for >1/3 area OR emergent plants >2/3 area.	<b>Points = 7</b>
<input type="checkbox"/>	Forest or shrub for >1/10 area OR emergent plants >1/3 area.	<b>Points = 4</b>
<input type="checkbox"/>	Vegetation does not meet above criteria.	<b>Points = 0</b>

7

*Add the points in the boxes above*

11

☒ There are human structures and activities downstream (roads, buildings, bridges, farms) that can be damaged by flooding.

☒ There are natural resources downstream (e.g., salmon redds) that can be damaged by flooding.

☐ Other:

Multiplier

2

NO - multiplier is 1

*Add score to table on p. 1*

22

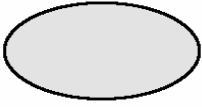
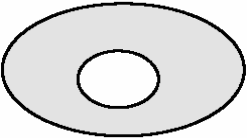
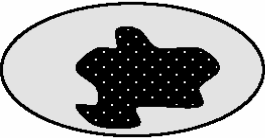
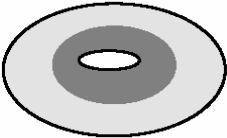


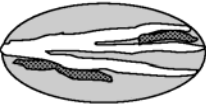
Comments:

*These questions apply to wetlands of all HGM classes*

**HABITAT FUNCTIONS** - Indicators that wetland functions to provide important habitat.

		Points
<b>H 1.</b>	<b>Does the wetland have the <u>potential</u> to provide habitat for many species?</b>	
H 1.1	<p><u>Vegetation structure</u> (<i>see p. 72</i>)</p> <p><i>Check the types of vegetation classes present (as defined by Cowardin) if the class covers more than 10% of the area of the wetland or 1/4 acre.</i></p> <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Aquatic bed  <input checked="" type="checkbox"/> Emergent plants  <input type="checkbox"/> Scrub/shrub (areas where shrubs have &gt;30% cover)  <input checked="" type="checkbox"/> Forested (areas where trees have &gt;30% cover)  <input type="checkbox"/> Forested areas have 3 out of 5 strata (canopy, sub-canopy, shrubs, herbaceous, moss/ground-cover) </div> <div> <p><i>Add the number of vegetation types that qualify. If you have:</i></p> <div style="display: flex; justify-content: space-between;"> <div>4 types or more</div> <div><b>Points = 4</b></div> </div> <div style="display: flex; justify-content: space-between;"> <div>3 types</div> <div><b>Points = 2</b></div> </div> <div style="display: flex; justify-content: space-between;"> <div>2 types</div> <div><b>Points = 1</b></div> </div> <div style="display: flex; justify-content: space-between;"> <div>1 type</div> <div><b>Points = 0</b></div> </div> </div> </div>	1
H 1.2	<p><u>Hydroperiods</u> (<i>see p. 73</i>)</p> <p><i>Check the types of water regimes (hydroperiods) present within the wetland. The water regime has to cover more than 10% of the wetland or 1/4 acre to count (see text for descriptions of hydroperiods).</i></p> <div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> Permanently flooded or inundated  <input checked="" type="checkbox"/> Seasonally flooded or inundated  <input checked="" type="checkbox"/> Occasionally flooded or inundated  <input type="checkbox"/> Saturated only  <input type="checkbox"/> Permanently flowing stream or river in, or adjacent to, the wetland  <input type="checkbox"/> Seasonally flowing stream in, or adjacent to, the wetland  <input type="checkbox"/> <b>Lake-fringe wetland = 2 points</b>  <input type="checkbox"/> <b>Freshwater tidal wetland = 2 points</b> </div> <div> <div style="display: flex; justify-content: space-between;"> <div>4 or more types present</div> <div><b>Points = 3</b></div> </div> <div style="display: flex; justify-content: space-between;"> <div>3 types present</div> <div><b>Points = 2</b></div> </div> <div style="display: flex; justify-content: space-between;"> <div>2 types present</div> <div><b>Points = 1</b></div> </div> </div> </div>	2
H 1.3	<p><u>Richness of Plant Species</u> (<i>see p. 75</i>)</p> <p><i>Count the number of plant species in the wetland that cover at least 10 sq. ft. (different patches of the same species can be combined to meet the size threshold). You do not have to name the species. Do not include Eurasian Milfoil, reed canarygrass, purple loosestrife, Canadian Thistle.</i></p> <div style="display: flex; justify-content: space-between;"> <div> <p><i>If you counted:</i></p> <div style="display: flex; justify-content: space-between;"> <div>&gt;19 species</div> <div><b>Points = 2</b></div> </div> <div style="display: flex; justify-content: space-between;"> <div>5-19 species</div> <div><b>Points = 1</b></div> </div> <div style="display: flex; justify-content: space-between;"> <div>&lt;5 species</div> <div><b>Points = 0</b></div> </div> </div> <p><i>List species below if you want to:</i></p> </div>	1



H 1.4		Points
<p><b>Interspersion of Habitats</b> (<i>see p. 76</i>)</p> <p>Decide from the diagrams below whether interspersions between types of vegetation (described in H 1.1) or vegetation types and unvegetated areas (can include open water or mudflats) is high, medium, low, or none.</p> <div style="display: flex; justify-content: space-around; align-items: center;">     </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <p>None = 0 points</p> <p>Low = 1 point</p> <p>Moderate = 2 points</p> </div> <div style="display: flex; justify-content: space-around; align-items: center; margin-top: 20px;">    <div style="text-align: right;"> <p>[riparian braided channels]</p> </div> </div> <p style="text-align: center; margin-top: 10px;">High = 3 points</p> <p>NOTE: If you have four or more vegetation types or three vegetation types and open water, the rating is always "high".</p>		3
<p><b>H 1.5</b></p> <p><b>Special Habitat Features</b> (<i>see p. 77</i>)</p> <p>Check the habitat features that are present in the wetland. The number of checks is the number of points you put into the next column.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Large, downed, woody debris within the wetland (&gt;4 inch in diameter and 6 feet long).</li> <li><input checked="" type="checkbox"/> Standing snags (diameter at the bottom &gt;4 inches) in the wetland.</li> <li><input type="checkbox"/> Undercut banks are present for at least 6.6 feet (2 m) and/or overhanging vegetation extends at least 3.3 feet (1 m) over a stream for at least 33 feet (10 m).</li> <li><input type="checkbox"/> Stable steep banks of fine material that might be used by beaver/muskrat for denning (&gt;30° slope) OR signs of recent beaver activity are present.</li> <li><input checked="" type="checkbox"/> At least 1/4 acre of thin-stemmed persistent vegetation or woody branches are present in areas that are permanently or seasonally inundated (<i>structures for egg-laying by amphibians</i>).</li> <li><input type="checkbox"/> Invasive plants cover less than 25% of the wetland area in each stratum of plants.</li> </ul>		2
<p><b>H 1. TOTAL</b> Score - potential for providing habitat</p> <p><i>Add the scores in the column above</i></p>		9
<p>Comments:</p>		

H 2. Does the wetland have the opportunity to provide habitat for many species?		Points
H 2.1	<p><u>Buffers</u> (see p. 80)</p> <p>Choose the description that best represents condition of buffer of wetland. The highest scoring criterion that applies to the wetland is to be used in the rating. See text for definition of "undisturbed."</p> <p><input type="checkbox"/> 100 m (330 feet) of relatively undisturbed vegetated areas, rocky areas, or open water &gt;95% of circumference. No developed areas within undisturbed part of buffer (<b>relatively undisturbed also means no grazing</b>). <b>Points = 5</b></p> <p><input type="checkbox"/> 100 m (330 feet) of relatively undisturbed vegetated areas, rocky areas, or open water &gt;50% of circumference. <b>Points = 4</b></p> <p><input type="checkbox"/> 50 m (170 feet) of relatively undisturbed vegetated areas, rocky areas, or open water &gt;95% circumference. <b>Points = 4</b></p> <p><input checked="" type="checkbox"/> 100 m (330 feet) of relatively undisturbed vegetated areas, rocky areas, or open water for &gt;25% circumference. <b>Points = 3</b></p> <p><input type="checkbox"/> 50 m (170 feet) of relatively undisturbed vegetated areas, rocky areas, or open water for &gt;50% circumference. <b>Points = 3</b></p> <p><b>If buffer does not meet any of the criteria above:</b></p> <p><input type="checkbox"/> No paved areas (except paved trails) or buildings within 25 m (80 feet) of wetland &gt;95% circumference. Light to moderate grazing, or lawns are OK. <b>Points = 2</b></p> <p><input type="checkbox"/> No paved areas or buildings within 50 m of wetland for &gt;50% circumference. Light to moderate grazing, or lawns are OK. <b>Points = 2</b></p> <p><input type="checkbox"/> Heavy grazing in buffer. <b>Points = 1</b></p> <p><input type="checkbox"/> Vegetated buffers are &lt;2 m wide (6.6 feet) for more than 95% of the circumference (e.g., tilled fields, paving, basalt bedrock extend to edge of wetland). <b>Points = 0</b></p> <p><input type="checkbox"/> Buffer does not meet any of the criteria above. <b>Points = 1</b></p>	3
H 2.2	<u>Corridors and Connections</u> (see p. 81)	
H 2.2.1	<p>Is the wetland part of a relatively undisturbed/unbroken vegetated corridor (riparian or upland) at least 150 feet wide, has at least 30% cover of shrubs, forest, or native undisturbed prairie, that connects to estuaries, other wetlands, or undisturbed uplands that are at least 250 acres in size? (Dams in riparian corridors, heavily used gravel roads, and paved roads are considered breaks in the corridor. )</p> <p>YES = <b>4 points</b> (go to H 2.3) NO = go to H 2.2.2</p>	
H 2.2.2	<p>Is the wetland part of a relatively undisturbed/unbroken vegetated corridor (either riparian or upland) at least 50 feet wide, has at least 30% cover of shrubs or forest, and connects to estuaries, other wetlands, or undisturbed uplands that are at least 25 acres in size <b>OR</b> a <b>Lake-fringe</b> wetland, if it does not have an undisturbed corridor as in the question above?</p> <p>YES = <b>2 points</b> (go to H 2.3) NO = go to H 2.2.3</p>	
H 2.2.3	<p>Is the wetland:</p> <p>– within 5 miles (8 km) of a brackish or salt water estuary <b>OR</b> within 3 miles of a large field or pasture (&gt;40 acres) <b>OR</b> within 1 mile of a lake greater than 20 acres?</p> <p>YES = <b>1 point</b> NO = <b>0 points</b></p>	2

H 2.3	Near or Adjacent to Other Priority Habitats Listed by WDFW ( <i>see p. 82</i> )	Points
	<p>Which of the following priority habitats are within 330 feet (100 m) of the wetland? (<i>See text for a more detailed description of these priority habitats.</i> )</p> <p><input checked="" type="checkbox"/> <b>Riparian:</b> Area adjacent to aquatic systems with flowing water that contains elements of both aquatic and terrestrial ecosystems which mutually influence each other.</p> <p><input type="checkbox"/> <b>Aspen stands:</b> Pure or mixed stands of aspen &gt;0.8 ha (2 acres).</p> <p><input type="checkbox"/> <b>Cliffs:</b> Greater than 7.6 m (25 feet) high and occurring below 5,000 feet.</p> <p><input type="checkbox"/> <b>Old-growth forests:</b> (old growth west of Cascade crest) Stands of at least 2 tree species, forming a multi-layered canopy with occasional small openings; with at least 20 trees/ha (8/acre) &gt;81 cm (32 inches) in diameter or &gt;200 years of age.</p> <p><input checked="" type="checkbox"/> <b>Mature forests:</b> Stands with average diameters exceeding 53 cm (21 inches) dbh; crown cover may be &lt;100%; decay, decadence, numbers of snags, and quantity of large downed material is generally less than found in old-growth; 80-200 years old west of Cascade crest.</p> <p><input type="checkbox"/> <b>Prairies:</b> Relatively undisturbed areas (indicated by dominance of native plants) where grasses/forbs form the natural climax plant community.</p> <p><input type="checkbox"/> <b>Talus:</b> Homogenous areas of rock rubble (average size 0.15 - 2.0 m [0.5 - 65 feet]), composed of basalt, andesite, and/or sedimentary rock, including riprap slides and mine tailings. May be associated with cliffs.</p> <p><input type="checkbox"/> <b>Caves:</b> Naturally occurring cavity, recess, void, or system of interconnected passages.</p> <p><input type="checkbox"/> <b>Oregon white oak:</b> Woodland stands of pure oak or oak/conifer associations where canopy coverage of the oak component is 25%.</p> <p><input type="checkbox"/> <b>Urban Natural Open Space:</b> A priority species resides within or is adjacent to the open space and uses it for breeding and/or regular feeding; and/or the open space functions as a corridor connecting other <i>priority habitats</i> , especially those otherwise isolated; and/or the open space is an isolated remnant of natural habitat &gt;4 ha (10 acres) and is surrounded by urban development.</p> <p><input type="checkbox"/> <b>Estuary/estuary-like:</b> Deepwater tidal habitats &amp; adjacent tidal wetlands, usually semi-enclosed by land but with open, partly obstructed, or sporadic access to open ocean; ocean water at least occasionally diluted by freshwater runoff from land. Salinity may be periodically increased above that of open ocean by evaporation. Along some low-energy coastlines, there is appreciable dilution of sea water. Estuarine habitat extends upstream and landward to where ocean-derived salts measure &lt;0.5 ppt. during period of avg. annual low flow. Includes both estuaries and lagoons.</p> <p><input type="checkbox"/> <b>Marine/estuarine shorelines:</b> Include intertidal and subtidal zones of beaches; may also include backshore and adjacent components of the terrestrial landscape (e.g., cliffs, snags, mature trees, dunes, meadows) important to shoreline associated fish and wildlife and that contribute to shoreline function (e.g., sand/rock/log recruitment, nutrient contribution, erosion control).</p>	
	<p>If wetland has:      <b>3+ priority habitats = 4 points</b>                      <b>1 priority habitat = 1 point</b>                                   <b>2 priority habitats = 3 points</b>                      <b>No habitats = 0 points</b></p>	3

H 2.4	<b>Wetland Landscape (<i>see p. 84</i>)</b> Choose the <b>one</b> description of the landscape around the wetland that best fits.	<b>Points</b>
<input type="checkbox"/>	There are at least 3 other wetlands within 1/2 mile, and the connections between them are relatively undisturbed (light grazing between wetlands OK, as is lake shore with some boating, but connections should NOT be bisected by paved roads, fill, fields, or other development).	<b>Points = 5</b>
<input type="checkbox"/>	The wetland is Lake-fringe on a lake with little disturbance and there are 3 other Lake-fringe wetlands within 1/2 mile.	<b>Points = 5</b>
<input checked="" type="checkbox"/>	There are at least 3 other wetlands within 1/2 mile, BUT the connections between them are disturbed.	<b>Points = 3</b>
<input type="checkbox"/>	The wetland is Lake-fringe on a lake <b>with</b> disturbance, and there are 3 other Lake-fringe wetlands within 1/2 mile.	<b>Points = 3</b>
<input type="checkbox"/>	There is at least 1 wetland within 1/2 mile.	<b>Points = 2</b>
<input type="checkbox"/>	There are no wetlands within 1/2 mile.	<b>Points = 0</b>
		3
<b>H 2. TOTAL Score</b> - opportunity for providing habitat <i>Add the scores in the column above</i>		11
<b>Total Score for Habitat Functions</b> - add the points for H 1, H2, and record the result on p. 1		20

## CATEGORIZATION BASED ON SPECIAL CHARACTERISTICS

*Please determine if the wetland meets the attributes described below and choose the appropriate answers and Category.*

<b>Wetland Type</b> <i>Check off any criteria that apply to the wetland. Check the appropriate Category when the appropriate criteria are met.</i>	<b>Category</b>
<b>SC 1.</b> <u>Estuarine Wetlands</u> (see p. 86) Does the wetland meet the following criteria for Estuarine wetlands? <div style="margin-left: 20px;"> <input type="checkbox"/> The dominant water regime is tidal,  <input type="checkbox"/> Vegetated, and  <input type="checkbox"/> With a salinity greater than 0.5 ppt.  <input type="checkbox"/> YES = <i>Go to SC 1.1</i>                      <input checked="" type="checkbox"/> NO         </div>	
<b>SC 1.1</b> Is the wetland within a National Wildlife Refuge, National Park, National Estuary Reserve, Natural Area Preserve, State Park, or Educational, Environmental, or Scientific Reserve designated under WAC 332-30-151? <div style="margin-left: 20px;"> <input type="checkbox"/> YES = <b>Category I</b>                      <input type="checkbox"/> NO = <i>Go to SC 1.2</i> </div>	
<b>SC 1.2</b> Is the wetland at least 1 acre in size and meets at least two of the following three conditions? <div style="margin-left: 20px;"> <input type="checkbox"/> The wetland is relatively undisturbed (has no diking, ditching, filling, cultivation, grazing, and has &lt;10% cover of non-native plant species. If the non-native <i>Spartina</i> spp. are the only species that cover &gt;10% of the wetland, then the wetland should be given a dual rating (I/II). The area of <i>Spartina</i> would be rated a Category II while the relatively undisturbed upper marsh with native species would be a Category I. Do not, however, exclude the area of <i>Spartina</i> in determining the size threshold of 1 acre.   <input type="checkbox"/> At least 3/4 of the landward edge of the wetland has a 100 foot buffer of shrub, forest, or ungrazed or unmowed grassland.   <input type="checkbox"/> The wetland has at least two of the following features: tidal channels, depressions with open water, or contiguous freshwater wetlands.   <input type="checkbox"/> YES = <b>Category I</b>                      <input type="checkbox"/> NO = <b>Category II</b> </div>	

<b>SC 2.</b>	<u>Natural Heritage Wetlands</u> ( <i>see p. 87</i> ) Natural Heritage wetlands have been identified by the Washington Natural Heritage Program/DNR as either high quality undisturbed wetlands or wetlands that support state Threatened, Endangered, or Sensitive plant species.	<b>Category</b>
SC 2.1	Is the wetland being rated in a Section/Township/Range that contains a Natural Heritage wetland? (This question is used to screen out most sites before you need to contact WNHP/DNR.)  S/T/R information from Appendix D <input type="checkbox"/> or accessed from WNHP/DNR web site <input checked="" type="checkbox"/> <input type="checkbox"/> YES - contact WNHP/DNR ( <i>see p. 79</i> ) and go to SC 3.2 <input checked="" type="checkbox"/> NO	
SC 2.2	Has DNR identified the wetland as a high quality undisturbed wetland or as a site with state Threatened or Endangered plant species?  <input type="checkbox"/> YES = <b>Category I</b> <input checked="" type="checkbox"/> NO	
<b>SC 3.</b>	<u>Bogs</u> ( <i>see p. 87</i> ) Does the wetland (or part of the wetland) meet both the criteria for soils and vegetations in bogs? <i>Use the key below to identify if the wetland is a bog. If you answer Yes, you will still need to rate the wetland based on its function.</i> <ol style="list-style-type: none"> <li>Does wetland have organic soil horizons (i.e., layers of organic soil), either peats or mucks, that compose 16 inches or more of the first 32 inches of the soil profile? (See Appendix B for a field key to identify organic soils.)  <input type="checkbox"/> YES - go to Q. 3 <input type="checkbox"/> NO - go to Q. 2         </li> <li>Does the wetland have organic soils, either peats or mucks, that are &lt;16 inches deep over bedrock, or an impermeable hardpan such as clay or volcanic ash, or that are floating on a lake or pond?  <input type="checkbox"/> YES - go to Q. 3 <input type="checkbox"/> NO - is not a bog for purpose of rating         </li> <li>Does wetland have more than 70% cover of mosses at ground level, AND other plants, if present, consist of the "bog" species listed in Table 3 as a significant component of the vegetation (&gt;30% of total shrub and herbaceous cover consists of species in Table 3)?  <input type="checkbox"/> YES - is a bog for purpose of rating <input type="checkbox"/> NO - go to Q. 4          NOTE: If you are uncertain about the extent of mosses in the understory you may substitute that criterion by measuring the pH of the water that seeps into a hole dug at least 16" deep. If the pH is less than 5.0 and the "bog" plant species in Table 3 are present, the wetland is a bog.         </li> <li>Is wetland forested (&gt;30% cover) with sitka spruce, subalpine fir, western redcedar, western hemlock, lodgepole pine, quaking aspen, Englemann's spruce, or western white pine, WITH any of the species (or combination of species) on bog species plant list in Table 3 as a significant component of the ground cover (&gt;30% coverage of total shrub/herbaceous cover)?  <input type="checkbox"/> YES - <b>Category I</b> <input checked="" type="checkbox"/> NO - is not a bog for purpose of rating         </li> </ol>	

		Category
SC 4.	<p><u>Forested Wetlands (see p. 90)</u></p> <p>Does the wetland have at least 1 acre of forest that meets one of these criteria for the Department of Fish and Wildlife's forests as priority habitat? <i>If you answer Yes, you will still need to rate the wetland based on its functions.</i></p> <p><input type="checkbox"/> <b>Old-growth forests:</b> (west of Cascade Crest) Stands of at least 2 tree species, forming a multi-layered canopy with occasional small openings; with at least 8 trees/acre (20/hectare) that are at least 200 years of age OR have a diameter at breast height (dbh) of 32 inches (81 cm) or more.</p> <p style="padding-left: 40px;">NOTE: The criterion for dbh is based on measurements for upland forests. 200-year-old trees in wetlands will often have a smaller dbh because their growth rates are often smaller. The DFW criterion is an "OR" so old-growth forests do not necessarily have to have trees of this diameter.</p> <p><input type="checkbox"/> <b>Mature forests:</b> (west of the Cascade Crest) Stands where the largest trees are 80 - 200 years old OR have average diameters (dbh) exceeding 21 inches (53 cm); crown cover may be less than 100%; decay, decadence, numbers of snags, and quantity of large downed material is generally less than that found in old-growth.</p> <p><input type="checkbox"/> YES = <b>Category I</b> <span style="margin-left: 100px;"><input checked="" type="checkbox"/> NO</span></p>	
SC 5.	<p><u>Wetlands in Coastal Lagoons (see p. 91)</u></p> <p>Does the wetland meet all of the following criteria of a wetland in a coastal lagoon?</p> <p><input type="checkbox"/> The wetland lies in a depression adjacent to marine waters that is wholly or partially separated from marine waters by sandbanks, gravel banks, shingle, or, less frequently, rocks.</p> <p><input type="checkbox"/> The lagoon in which the wetland is located contains surface water that is saline or brackish (&gt;.5 ppt) during most of the year in at least a portion of the lagoon (<i>needs to be measured near the bottom</i>).</p> <p><input type="checkbox"/> YES = go to SC 5.1 <span style="margin-left: 100px;"><input checked="" type="checkbox"/> NO - not a wetland in a coastal lagoon</span></p>	
SC 5.1	<p>Does the wetland meet all of the following 3 conditions?</p> <p><input type="checkbox"/> The wetland is relatively undisturbed (has no diking, ditching, filling, cultivation, grazing), and has less than 20% cover of invasive plant species (see list of invasive species on p. 74).</p> <p><input type="checkbox"/> At least 3/4 of the landward edge of the wetland has a 100 foot buffer of shrub, forest, or ungrazed or unmowed grassland.</p> <p><input type="checkbox"/> The wetland is larger than 1/10 acre (4,350 square feet).</p> <p><input type="checkbox"/> YES = <b>Category I</b> <span style="margin-left: 100px;"><input type="checkbox"/> NO = <b>Category II</b></span></p>	

<p><b>SC 6. Interdunal Wetlands (<i>see p. 93</i>)</b>          Is the wetland west of the 1889 line (also called the Western Boundary of Upland Ownership or WBUO)?</p> <p><input type="checkbox"/> YES - <i>go to SC 6.1</i>                      <input checked="" type="checkbox"/> NO - not an interdunal wetland for rating  <i>If you answer Yes, you will still need to rate the wetland based on its functions.</i></p> <p>In practical terms, that means the following geographic areas:</p> <ul style="list-style-type: none"> <li>• Long Beach Peninsula - lands west of SR 103</li> <li>• Grayland-Westport - lands west of SR 105</li> <li>• Ocean Shores-Copalis - lands west of SR 1115 and SR 109.</li> </ul> <p>SC 6.1 Is wetland 1 acre or larger, or is it in a mosaic of wetlands that is 1 acre or larger?  <input type="checkbox"/> YES = <b>Category II</b>                      <input type="checkbox"/> NO - <i>go to SC 6.2</i></p> <p>SC 6.2 Is the wetland between 0.1 and 1 acre, or is it in a mosaic of wetlands that is between 0.1 and 1 acre?  <input type="checkbox"/> YES = <b>Category III</b></p>	<p><b>Category</b></p>
<p><b>Category of wetland based on Special Characteristics</b>          Choose the "highest" rating if wetland falls into several categories, and record on p. 1.          If you answered NO for all types, enter "Not Applicable" on p. 1.</p>	



## **ATTACHMENT 2**

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Department of Ecology Functional  
Assessment Forms (Hruby 1999)

Wetland Name:

GW and VL (inc. former HS + RD)

AU ID#:

Location:

Issaquah, WA

T/S/R:

24 N / 34 / 6 E

Data Collector:

G. I. Fisher, J. Wozniak

Date:

1/26/05

Use this data sheet for:

**DEPRESSIONAL OUTFLOW or RIVERINE IMPOUNDING wetlands**  
in the Lowlands of Western Washington

- Use in conjunction with the written guidance provided in Parts 1 and 2
- Record only numbers, yes/no answers are recorded as a [1] or [0]

Estimate,

Score/ or Rating

**LANDSCAPE DATA**

- 0 1/0 D0 Do dikes surround the AU, and does it drain through a control structure that can be manipulated?
- 10.9 ha D1 Area of AU
- 50 ha D2 Area of contributing basin (upgradient watershed)
- 25 % D3 Land use (as % of total area) within 1 km of AU (include contiguous AUs of different class)
- 0 % D3.1 Undeveloped forest (if previously clear-cut, cut at least 5 years ago)
- 0 % D3.2 Agriculture (tilled fields and pastures; includes golf courses)
- 0 % D3.3 Clear-cut logging (<5 years since clearing)
- 15 % D3.4 Urban/commercial (any developed areas not identified as residential)
- 0 % D3.5 High density residential (>1 residence/acre)
- 50 % D3.6 Low density residential (<= 1 residence/acre)
- 10 % D3.7 Undeveloped areas, shrubland, other wetlands, and open water

**WATER REGIME**

- 1 0/1 D4 Channels, ditches, or streams in AU
- 1 0/1 D4.1 Channels, ditches, or streams in AU have permanently flowing water (*you see water flowing*)
- 0 0/1 D4.2
- 0 0/1 D4.3 The only surface outflow from the AU is through a culvert (<60 cm) or vertical siphon
- D5
- D6
- D7
- D8 Inundation
- 65 % D8.1 Percent of AU that is ponded or inundated for >1 month
- 20 % D8.2 Percent of AU with permanent standing or moving water
- 10 % D8.3 Percent of AU with permanent open water (*without aquatic bed vegetation*)
- 0 % D8.4 Percent of AU with unvegetated bars or mudflats
- 0 0/1 D8.5 Unvegetated bars or mudflats at least 100 square meters in size
- D9 Inundation regimes
- 1 0/1 D9.1 Permanently flooded (include vegetated areas)
- 1 0/1 D9.2 Seasonally flooded (>1 month)
- 1 0/1 D9.3 Occasionally flooded (<= 1 month)
- 1 0/1 D9.4 Saturated but seldom inundated
- 1 0/1 D9.5 Permanently flowing stream
- 0 0/1 D9.6 Intermittently flowing stream
- 0.3 m D10 Average height of annual flooding above lowest point of outlet or surface of permanent stream at outlet (round to 0.3 m)

By definition:

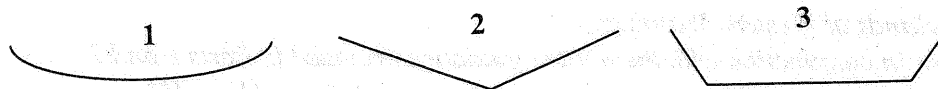
D8.1 &gt;= D8.2 &gt;= D8.3

Chose all that apply that meet size  
criteria: area >0.1 ha (1/4 acre) or  
> 10% of AU if AU smaller than 1 ha  
(2.5 acres)

# DEPRESSIONAL OUTFLOW or RIVERINE IMPOUNDING

<b>Wetland Name:</b>	<b>AU ID#:</b>
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	<b>D11</b>	<u>Cross section of AU</u> in areas of seasonal inundation (record a 1 next to cross section that best fits)
<div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">1</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">0</div> <div style="border: 1px solid black; padding: 2px;">0</div>	0/1 D11.1 Cross section 1 0/1 D11.2 Cross section 2 0/1 D11.3 Cross section 3	



	<b>D12</b>	<u>Categories of water depths</u> in AU, areas permanently or seasonally inundated/flooded
<div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">1</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">1</div> <div style="border: 1px solid black; padding: 2px;">0</div>	0/1 D12.1 1-20 cm (<8 in) 0/1 D12.2 20-100 cm (8-40 in) 0/1 D12.3 >100 cm (>40 in)	Record a 1 for each category present if >0.1 ha (1/4 acre) or 10% of area

	<b>D13</b>	<u>Constriction of outlet</u>
<div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">0</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">1</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">0</div> <div style="border: 1px solid black; padding: 2px;">1</div>	0/1 D13.1 Unconstricted or only slightly constricted 0/1 D13.2 Moderately constricted 0/1 D13.3 Severely constricted 0/1 D13.4 Riverine Impounding only – Completely constricted (no surface outlet)	If the AU has multiple outlets, judge the constriction as if all the outlets were combined into one large one.

	<b>D14</b>	<u>VEGETATION</u> <u>Cowardin Classes</u> (as % area of AU)
<div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">10</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">45</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">0</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">35</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">10</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">0</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">1</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">15</div> <div style="border: 1px solid black; padding: 2px;">90</div>	% D14.1 Forest - evergreen % D14.2 Forest -deciduous % D14.3 Scrub-shrub - evergreen % D14.4 Scrub-shrub - deciduous % D14.5 Emergent % D14.6 Aquatic bed 0/1 D15 Does D8.3 + D8.4 + sum (D14.1 to D14.6) = 100? If not, give reason. % D16 % area of herbaceous understory in forest and shrub areas (not % area in entire AU) % D17 % area of AU with >75% closure of canopy (SS, FO classes > 1 m high)	<ul style="list-style-type: none"> <li>Include forest only if trees are rooted in AU.</li> <li>If forest is a mix of deciduous and evergreen estimate the relative % cover of each and divide percentage between the two categories.</li> <li>If vegetation classes are patchy, add the patches together for each class to get a total.</li> <li>To count, a class must cover at least 0.1 ha or be more than 10% of the total area of the AU</li> </ul>

	<b>D18</b>	
	<b>D19</b>	<u>Plant Richness</u>
<div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">15</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">3</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">3</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">3</div> <div style="border: 1px solid black; padding: 2px;">1</div>	# D19.1 Record number of native plant species found in AU # D19.2 Record number of non- native plant species found in AU # D20 The # of plant assemblages in the AU with area >0.1 ha (1/4 acre) or >10% if AU <1 ha (if more than 12 record a 12) [1-6] D21 <u>Strata</u> : The maximum # of strata present in any plant assemblage 0/1 D21.1 Is vine stratum dominated by non-native blackberries?	A stratum must have 20% cover in assemblage

# DEPRESSIONAL OUTFLOW or RIVERINE IMPOUNDING

Wetland Name:

AU ID#:

0/1 D22

Mature trees in AU

Average DBH of 3 out of 5  
largest trees of a species has  
to exceed size threshold

*Tsuga heterophylla* (western hemlock) >45 cm (18")

*Thuja plicata* (western red cedar) >45 cm (18")

*Pseudotsuga menziesii* (Douglas fir) >45 cm (18")

*Picea sitchensis* (Sitka spruce) >45 cm (18")

*Populus balsamifera* (black cottonwood) >45 cm (18")

*Acer macrophyllum* (big-leaf maple) >45 cm (18")

*Alnus rubra* (red alder) >30 cm (12")

*Fraxinus latifolia* (Oregon ash) >30 cm (12")

*Pinus contorta* (lodgepole pine) >30 cm (12")

*Salix lucida* (Pacific willow) >30 cm (12")

## D23 Sphagnum bogs

0/1 D23.1 % area of Sphagnum bogs >75%

0/1 D23.2 % area of Sphagnum bogs = 50-75%

0/1 D23.3 % area of Sphagnum bogs = 25-49%

0/1 D23.4 % area of Sphagnum bogs = 1-24%

0/1 D23.5 % area of Sphagnum bogs = 0%

## D24 Dominance by non-native plant species

0/1 D24.1 % area of non-native species >75%

0/1 D24.2 % area of non-native species = 50-75%

0/1 D24.3 % area of non-native species = 25-49%

0/1 D24.4 % area of non-native species = 1-24%

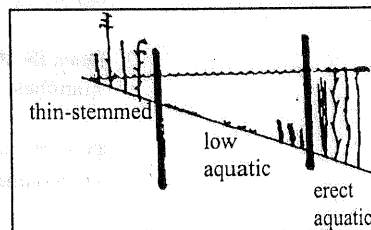
0/1 D24.5 % area of non-natives = 0%

## HABITAT CHARACTERISTICS

[0-3] D25 Number of structure categories in aquatic bed vegetation

*Applies only to aquatic bed species*

*DO NOT count persistent emergents*



## D26 pH

[4-9] D26.1 pH of interstitial water (*measure immediately after digging hole in non-inundated areas*)

[4-9] D26.2 pH of open or standing water (*record the lowest pH, if you cannot measure record a [7]*)

0/1 D27 Estuary: AU is within 8 km (5 mi) of a brackish or salt water estuary

0/1 D28 Large lake: AU is within 1.6km (1 mi) of a lake >8 ha (20 acres)

0/1 D29 Open field: AU is within 5 km (3 mi) of an open field (agriculture or pasture) >16 ha (40 acres)

0/1 D30 Preferred woody vegetation: AU has >1 ha (2.5 acres) of preferred woody vegetation for beaver in and within 100 m of AU

# DEPRESSIONAL OUTFLOW or RIVERINE IMPOUNDING

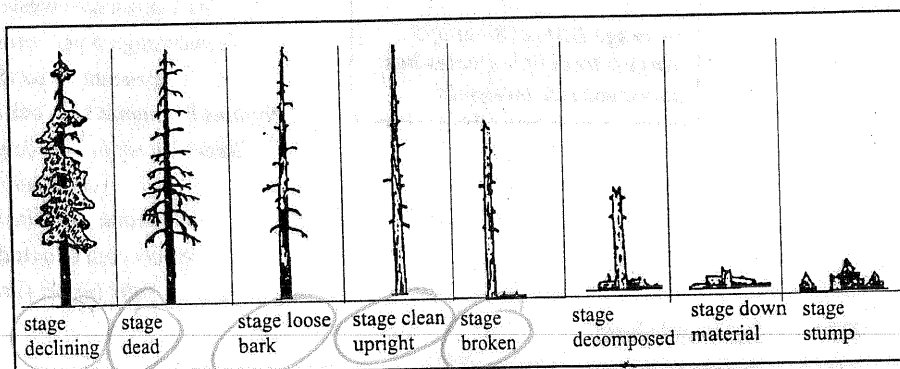
Wetland Name:

AU ID#:

[0-8] D31

Snags (record # of stages)

Circle the categories present; minimum DBH of snag = 10 cm (4")



1  
1  
0  
1  
3

0/1 D31.1

At least one of the snags above has a DBH greater than 30 cm (12").

0/1 D32

Overhanging vegetation, extending out for 1 m, for at least 10 m (33 ft) over stream or open water.

0/1 D33

Upland islands of at least 10 square meters (100 square ft.) within AU boundary

*Islands need to be surrounded by at least 30 m (100 ft) of open water deeper than 1 m (3 ft)*

0/1 D34

Undercut banks present for at least 2 m (6.6 ft.)

[0-4] D35

Key for rating egg-laying structures for amphibians

1. Does the AU have thin-stemmed vegetation or thin branches (<8 mm) in at least 1/4 acre (or 10% of AU) of permanent or seasonally inundated areas? *Thin-stemmed vegetation can include herbaceous species such as water parsley.*

NO - Score = 0

YES go to 2

2. Does the AU have at least 0.2 ha (1/2 acre) of thin-stemmed emergent vegetation or woody branches, 1-4 mm in diameter?

NO go to 5

YES go to 3

3. Does the area with thin stems contain open water interspersed in a patchwork of a ratio that is approximately 1:1 [no more than a 40- 60% of the total area is open water)?

NO go to 4

YES - Score = 4

4. Is the area of open water between 25% and 75% of the total area in the zone of thin stemmed vegetation?

NO - Score = 2

YES - Score = 3 STOP

5. Does the AU have >0.1 ha (1/4 acre) of thin-stemmed emergent vegetation or woody branches, 1-4 mm?

NO - Score = 1

YES go to 6

6. Does the area with thin stems contain open water interspersed in a patchwork of a ratio that is approximately 1:1 [no more than a 40- 60% of the total area is open water)?

NO go to 7

YES - Score = 3

7. Is the area of open water between 25% and 75% of the total area in the zone of thin stemmed vegetation?

NO - Score = 1

YES - Score = 2

# DEPRESSIONAL OUTFLOW or RIVERINE IMPOUNDING

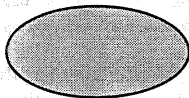
Wetland Name:

AU ID#:

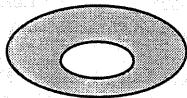
0 0/1 D36 Tannins in surface waters >10% of water surface

1 0/1 D37 Steep banks for denning (>30 degree slope, fine material, >10 m long, >0.6 m high) (may be a dike)

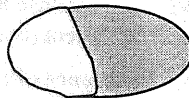
1 [0-3] D38 Interspersion between erect vegetation and permanent open water (POW + AB) areas of AU



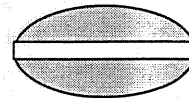
None [0]



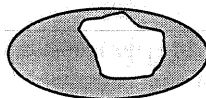
Low [1]



Low [1]



Low [1]



Moderate [2]



Moderate [2]



High [3]



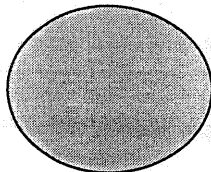
High [3]

2 [0-3] D39 Interspersion between Cowardin vegetation classes

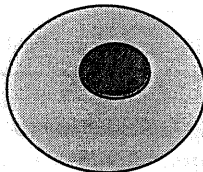
\*AUs with only 2 classes can only score a moderate[2] or lower

\*AUs with 4 vegetation classes score a high [3]

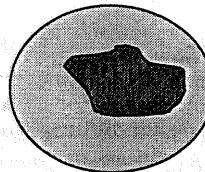
\*AUs with 3 classes can score a moderate (2) or a high (3)



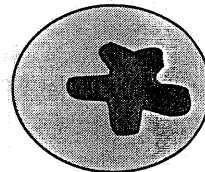
None [0]



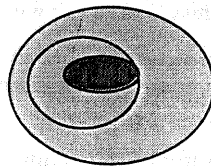
Low [1]



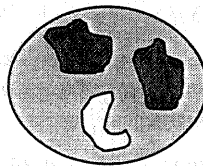
Low [1]



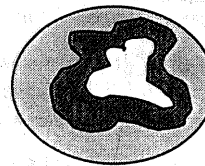
Moderate [2]



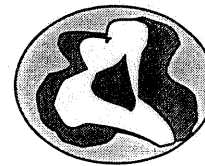
Moderate [2]



High [3]



High [3]



High [3]

# DEPRESSIONAL OUTFLOW or RIVERINE IMPOUNDING

Wetland Name:

AU ID#:

D40

[0-3] D41

Edge of AU: The characteristics of the edge between AU and uplands or adjacent wetlands.

*Choose the description that best fits the characteristics of the AU edge:*

- 0 There are **no differences in level** of vegetation height as reflected by vegetation classes on each side of the AU for more than 50% of the circumference: record a [0] **regardless of the sinuosity**.  
Examples: emergent (or herbaceous) to emergent (or herbaceous), shrub to shrub, forest to forest.
- 1 There is a **difference of one level** in vegetation height as reflected by vegetation classes on each side of the AU and the **edge is straight** for more than 50% of the circumference: record a [1]. Example: emergent (or herbaceous) to shrub, shrub to forest
- 2 There is a **difference of one level** in vegetation height as reflected by vegetation classes on each side of the AU and the **edge is sinuous** for more than 50% of the circumference: record a [2]. Examples: emergent (or herbaceous) to shrub, shrub to forest.
- 2 There is a **difference of more than one level** of vegetation height as reflected by vegetation classes on each side of the AU and the **edge is straight**: record a [2]. Examples: emergent (or herbaceous) to forest, bryophytes to scrub/shrub or forest.
- 3 There is a **difference of more than one level** of vegetation height as reflected by vegetation classes on each side of the AU and the **edge is sinuous**: record a [3]. Example: emergent (or herbaceous) to forest, bryophytes to scrub/shrub or forest.
- 2 If **no single category** above extends for more than 50% of the circumference, and the **edge is straight**: record a [2]
- 3 If **no single category** above extends for more than 50% of the circumference, and the **edge is sinuous**: record a [3]

[0-5] D42

Buffer of AU: Choose the description that best represents condition of AU buffer

\* *Open water or adjacent wetlands are considered part of the buffer*  
 \* *Infrequently used gravel or paved roads or vegetated dikes in a relatively undisturbed buffer can be ignored as a "disturbance"*

- 5 100 m (330 ft) of forest, scrub, relatively undisturbed grassland or open water >95% of circumference. Clear-cut >5 years old is OK. No developed areas within undisturbed part of buffer.
- 4 100 m (330 ft) of forest, scrub, relatively undisturbed grassland or open water >50% circumference OR 50 m (170 ft) of forest scrub, grassland or open water >95% circumference. No developed areas within undisturbed part of buffer.
- 3 100 m (330 ft) of forest, scrub, grassland or open water >25% circumference, OR 50 m (170 ft) of forest, scrub, grassland or open water >50% circumference.
- 2 No paved areas or buildings within 25m (80 ft) of wetland >95% circumference. Pasture or lawns are OK. OR no paved areas or buildings within 50m of wetland >50% circumference
- 0 Vegetated buffers are <2 m wide (6.6 ft) for more than 95% of the circumference
- 1 Does not meet any of the criteria above

# DEPRESSIONAL OUTFLOW or RIVERINE IMPOUNDING

Wetland Name:

AU ID#:

[0-3] D43

Corridors of AU: Rate corridors using following key (record rating of 0, 1, 2, or 3)

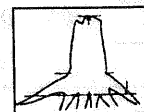
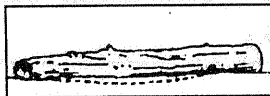
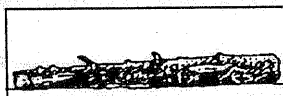
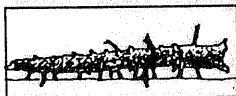
1. Is the AU part of a riparian corridor (see text for definitions)  
 NO go to 5 YES go to 2
2. Is the wetland part of riparian corridor > 50 m wide connecting 2 or more wetlands within 1 km with at least 30% shrub or forest cover in the corridor?  
 NO go to 3 YES = [3]
3. Is the AU part of a riparian corridor 25-50 m wide connecting to other wetlands with at least 30% shrub or forest cover in the corridor?  
 NO go to 4 YES = [2]
4. Is the AU part of a riparian corridor >5 m wide with relatively undisturbed veg. (grasslands, abandoned pasture are OK) that extends for more than 1 km?  
 NO go to 5 YES = [1]
5. Is there a corridor >50 m wide with good (>30%) cover of forest or shrub (>2 m high) to natural upland area or open water that is >100 ha in size?  
 NO go to 6 YES = [3]
6. Is there a 10-50 m wide forest or shrub corridor to a relatively undisturbed upland or open water that is >10 ha?  
 NO go to 7 YES = [2]
7. Is there a corridor of relatively undisturbed vegetation (grassland, abandoned pasture) >50 m wide to an undisturbed upland or open water that is >10 ha?  
 NO go to 8 YES = [2]
8. Is there any vegetated corridor 5-50 m wide between the AU and any relatively undisturbed area or open water that is >2.5 ha?  
 NO = [0] YES = [1]

4

[0-12] D44

# of categories of large woody debris in AU outside of perm. water

Freshly cut stumps are not included



Diameter

10-20cm (4-8")  
 21-50cm (8-20")  
 >50 cm (>20")

Log Class 1


Log Class 2

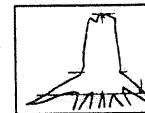
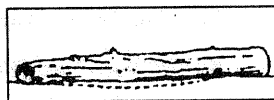
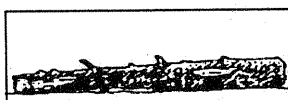
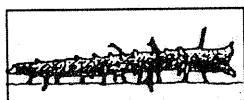

Log Class 3


Stump


5

[0-12] D45

# of categories of large woody debris in permanent water of AU (may include aquatic bed areas)



Diameter

10-20cm (4-8")  
 21-50cm (8-20")  
 >50 cm (>20")

Log Class 1


Log Class 2


Log Class 3


Stump




# DEPRESSIONAL OUTFLOW or RIVERINE IMPOUNDING

Wetland Name:		AU ID#:	
<b>SOILS and SUBSTRATES</b>			
<b>D46 Composition of AU surface</b>			
<u>1</u>	0/1	D46.1	Deciduous, broad-leaved, leaf litter
<u>1</u>	0/1	D46.2	Other plant litter
<u>1</u>	0/1	D46.3	Decomposed organic
<u>0</u>	0/1	D46.4	Exposed cobbles
<u>0</u>	0/1	D46.5	Exposed gravel
<u>1</u>	0/1	D46.6	Exposed sand
<u>0</u>	0/1	D46.7	Exposed silt
<u>0</u>	0/1	D46.8	Exposed clay
<b>D47 Soils present in top (15 cm) of A horizon (record [1] if 1-49% area of AU, [2] if 50-95%, [3] if &gt;95%)</b>			
<u>0</u>	[0-3]	D47.1	Peat
<u>0</u>	[0-3]	D47.2	Organic Muck
<u>2</u>	[0-3]	D47.3	Mineral with clay fraction <30%
<u>0</u>	[0-3]	D47.4	Clay (clay fraction >30%)
<b>D48 Infiltration rate of top 60 cm of soil in seasonally inundated areas</b>			
<u>0</u>	0/1	D48.1	Fast >50% gravel and cobble and the rest a sand, loamy sand, or sandy loam
<u>1</u>	0/1	D48.2	Moderate >50% sand and rest cobble, gravel, loamy sand, or sandy loam
<u>0</u>	0/1	D48.3	Slow - muck, peat, or loams (except sandy loam), silts, and clays
<b>D49 Substrate of streams</b>			
<u>0</u>	0/1	D49.1	Substrate of permanent stream or river in AU has at least 1 square meter of gravel
<u>0</u>	0/1	D49.2	Substrate of permanent stream or river in AU has at least 1 square meter of cobbles
D49.3			

Record a 1 for each category present if its area is > 10 square meters. Note: bare earth from animal tunnels does NOT count.

Record the least permeable layer if there are several down to 60 cm.

## Judgements of Opportunity (Ratings of High, Medium, Low)

Rating	Functions
<u>6</u>	Removing Sediments
<u>5</u>	Removing Nutrients
<u>5</u>	Removing Toxic Metals and Organics
<u>6</u>	Reducing Peak Flows
<u>8</u>	Reducing Downstream Erosion
<u>7</u>	Recharging Groundwater
<u>6</u>	General Habitat
<u>7</u>	Anadromous Fish Habitat

Wetland Name: Hope Property  
 Location: Front Street - Issaquah, WA  
 Data Collector: JW, GE

AU ID#: \_\_\_\_\_  
 T/S/R: 24N/34/6E  
 Date: 1/25/05

Use this data sheet for:

**RIVERINE FLOW-THROUGH wetlands**  
 in the Lowlands of Western Washington

- Use in conjunction with the written guidance provided in Parts 1 and 2
- Record only numbers, yes/no answers are recorded as a [1] or [0]

Estimate,  
 Score/ or Rating

**LANDSCAPE DATA**

<u>0</u>	1/0	D0	
<u>24</u>	ha	D1	<u>Area of AU</u>
<u>100</u>	ha	D2	<u>Area of contributing basin</u> (upgradient watershed)
		D3	<u>Land use (as % of total area) within 1 km of AU</u> (include contiguous AUs of different class)
<u>20</u>	%	D3.1	Undeveloped forest (if previously clear-cut, cut at least 5 years ago)
<u>0</u>	%	D3.2	Agriculture (tilled fields and pastures; includes golf courses)
<u>0</u>	%	D3.3	Clear-cut logging (<5 years since clearing)
<u>15</u>	%	D3.4	Urban/commercial (any developed areas not identified as residential)
<u>0</u>	%	D3.5	High density residential (>1 residence/acre)
<u>30</u>	%	D3.6	Low density residential (<= 1 residence/acre)
<u>35</u>	%	D3.7	Undeveloped areas, shrubland, other wetlands, and open water

**WATER REGIME**

<u>1</u>	0/1	D4	<u>Channels, ditches, or streams in AU</u>
<u>1</u>	0/1	D4.1	Channels, ditches, or streams in AU have permanently flowing water ( <i>you see water flowing</i> )
<u>0</u>	0/1	D4.2	Channel or stream is contained by dikes
		D4.3	
<u>20</u>		D5	Average width of stream in, or adjacent to, AU (bank to bank)
<u>200</u>		D6	Average width of AU perpendicular to stream or river
<u>1</u>		D7	Ratio of length of channel to length of AU <u>1:1</u>
		D8	<u>Inundation</u>
	%	D8.1	
<u>50</u>	%	D8.2	Percent of AU with permanent standing or moving water (has to be stream within AU)
<u>20</u>	%	D8.3	Percent of AU with permanent open water in stream ( <i>without aquatic bed vegetation</i> )
<u>0</u>	%	D8.4	Percent of AU with unvegetated bars or mudflats
<u>0</u>	0/1	D8.5	Unvegetated bars or mudflats at least 100 square meters in size
		D9	<u>Inundation regimes</u>
		D9.1	
		D9.2	
<u>1</u>	0/1	D9.3	Occasionally flooded (<= 1 month)
<u>1</u>	0/1	D9.4	Saturated but seldom inundated
<u>1</u>	0/1	D9.5	Permanently flowing stream
<u>0</u>	0/1	D9.6	Intermittently flowing stream
		D10	

Use channel with greatest volume  
 or largest cross section

Chose all that apply that meet size  
 criteria: area >0.1 ha (1/4 acre) or  
 > 10% of AU if AU smaller than 1 ha  
 (2.5 acres)

# RIVERINE FLOW-THROUGH

Wetland Name:

AU ID#:

D11

D11.1

D11.2

D11.3

D12 Categories of water depths in stream of AU (record only if D4 = 1)

0/1 D12.1 1-20 cm (<8 in)

0/1 D12.2 20-100 cm (8-40 in)

0/1 D12.3 >100 cm (>40 in)

Record a 1 for each category present if  
>0.1 ha (1/4 acre) or 10% of area

D13 Constriction of outlet

D13.1

D13.2

D13.3

D13.4

## VEGETATION

D14 Cowardin Classes (as % area of AU)

% D14.1 Forest - evergreen

% D14.2 Forest - deciduous

% D14.3 Scrub-shrub - evergreen

% D14.4 Scrub-shrub - deciduous

% D14.5 Emergent

% D14.6 Aquatic bed

0/1 D15 Does D8.3 + D8.4 + sum (D14.1 to D14.6) = 100? If not, give reason.

% D16 % area of herbaceous understory in forest and shrub areas (not % area in entire AU)

% D17 % area of AU with >75% closure of canopy (SS, FO classes > 1 m high)

D18 % length of stream with a 75% canopy closure

D19 Plant Richness

# D19.1 Record number of native plant species found in AU

# D19.2 Record number of non- native plant species found in AU

# D20 The # of plant assemblages in the AU with area >0.1 ha (1/4 acre) or >10% if AU <1 ha (if more than 12 record a 12)

[1-6] D21 Strata: The maximum # of strata present in any plant assemblage

0/1 D21.1 Is vine stratum dominated by non-native blackberries?

A stratum must have 20%  
cover in assemblage

Alnus rubra  
Rumex crispus repens  
✓ Rubus americanus  
✓ Platanus occidentalis  
cut leaf blackberry  
orchard grass  
Canadian thistle  
spruce

Juncus effusus  
Rubus spectabilis  
Salix lucida  
Equisetum telmateia  
Tall fescue  
Agrostis sp.  
✓ Holly

Wetland Name: _____	AU ID#: _____
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0/1 D22 Mature trees in AU

Average DBH of 3 out of 5 largest trees of a species has to exceed size

*Tsuga heterophylla* (western hemlock) >45 cm (18")  
*Thuja plicata* (western red cedar) >45 cm (18")  
*Pseudotsuga menziesii* (Douglas fir) >45 cm (18")  
*Picea sitchensis* (Sitka spruce) >45 cm (18")  
*Populus balsamifera* (black cottonwood) >45 cm (18")  
*Acer macrophyllum* (big-leaf maple) >45 cm (18")  
*Alnus rubra* (red alder) >30 cm (12")  
*Fraxinus latifolia* (Oregon ash) >30 cm (12")  
*Pinus contorta* (lodgepole pine) >30 cm (12")  
*Salix lucida* (Pacific willow) >30 cm (12")

**D23**

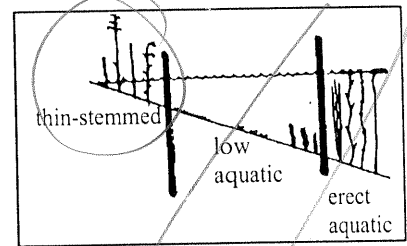
D23.1  
 D23.2  
 D23.3  
 D23.4  
 D23.5

**D24** Dominance by non-native plant species

0	0/1	D24.1	% area of non-native species >75%
0	0/1	D24.2	% area of non-native species = 50-75%
0	0/1	D24.3	% area of non-native species = 25-49%
1	0/1	D24.4	% area of non-native species = 1-24%
0	0/1	D24.5	% area of non-natives = 0%

**HABITAT CHARACTERISTICS**

1 [0-3] **D25** Number of structure categories in aquatic bed vegetation  
*Applies only to aquatic bed species*  
*DO NOT count persistent emergents*



**D26** pH

7	[4-9]	D26.1	pH of interstitial water (measure immediately after digging hole in non-inundated areas)
7	[4-9]	D26.2	pH of open or standing water (record the lowest pH, if you cannot measure record a [7])

1	0/1	D27	<u>Estuary</u> : AU is within 8 km (5 mi) of a brackish or salt water estuary
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0	0/1	D28	<u>Large lake</u> : AU is within 1.6km (1 mi) of a lake >8 ha (20 acres)
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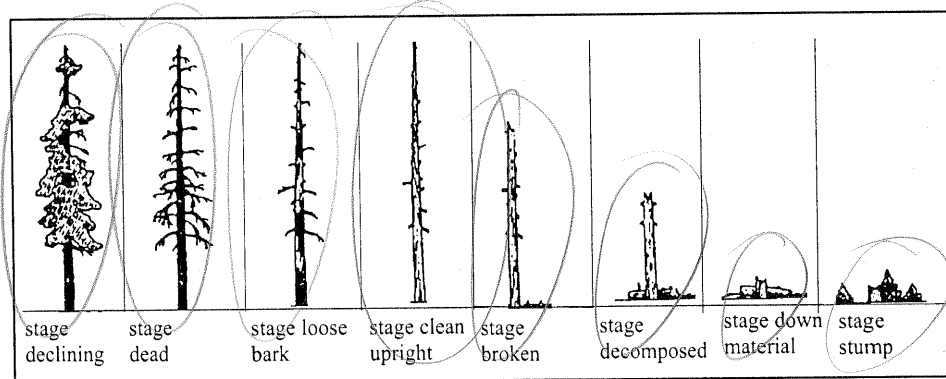
0	0/1	D29	<u>Open field</u> : AU is within 5 km (3 mi) of an open field (agriculture or pasture) >16 ha (40 acres)
---	-----	-----	--

1	0/1	D30	<u>Preferred woody vegetation</u> : AU has >1 ha (2.5 acres) of preferred woody vegetation for beaver in and within 100 m of AU
---	-----	-----	---

8

[0-8] D31

Circle the categories present; minimum DBH of snag = 10 cm (4")

0/1 *D31.1*

0/1 D32

0/1 D33

*Islands need to be surrounded by at least 30 m (100 ft) of open water deeper than 1 m (3 ft)*

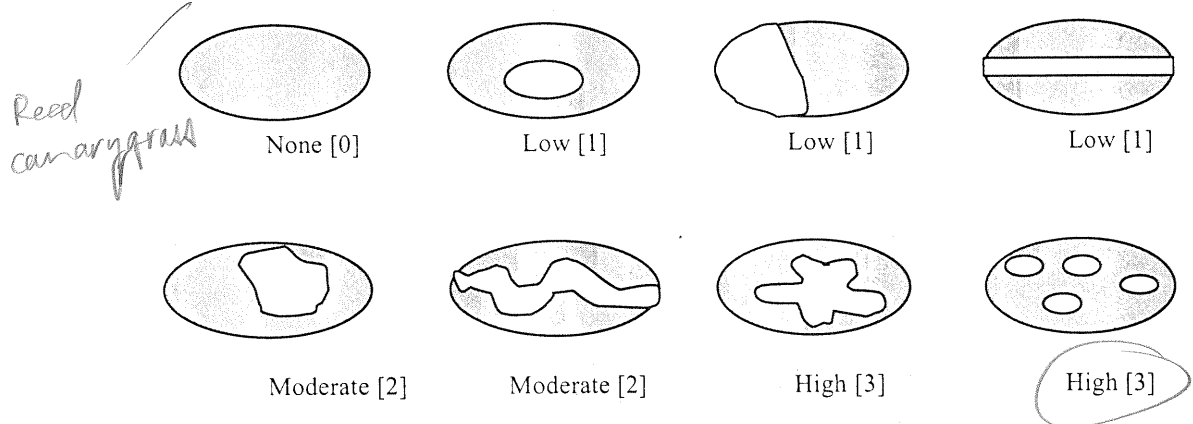
0/1 D34

D35

# RIVERINE FLOW-THROUGH

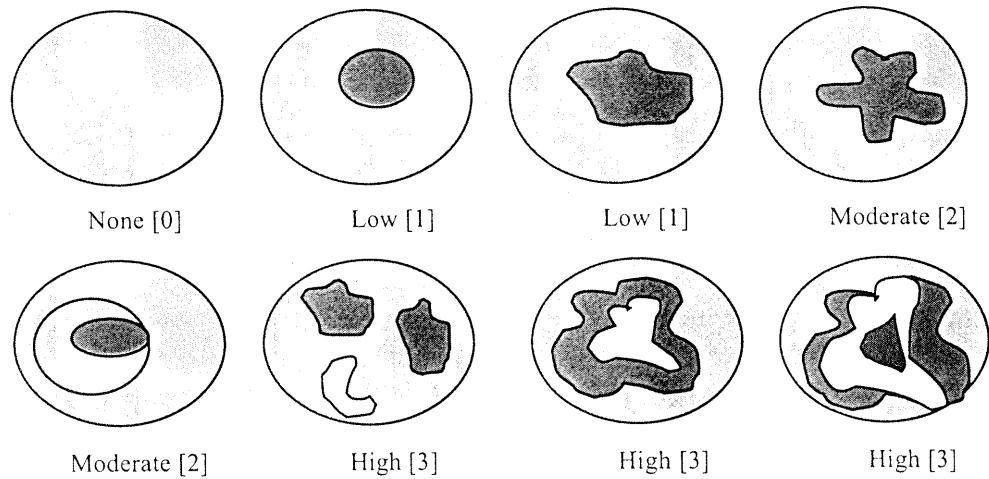
Wetland Name:	AU ID#:
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- 0 0/1 D36 Tannins in surface waters >10% of water surface
- 0 0/1 D37 Steep banks for denning (>30 degree slope, fine material, >10 m long, >0.6 m high) (may be a dike)
- 3 [0-3] D38 Interspersion between erect vegetation and permanent open water (POW + AB) areas of AU



- 2 [0-3] D39 Interspersion between Cowardin vegetation classes

\*AUs with only 2 classes can only score a moderate [2] or lower  
 \*AUs with 4 vegetation classes score a high [3]  
 \*AUs with 3 classes can score a moderate (2) or a high (3)



<b>Wetland Name:</b>	<b>AU ID#:</b>
----------------------	----------------

- |   |       |     |  |
|---|-------|-----|--|
| 1 | 0/1   | D40 | Structures in AU that create flow eddies (bars, large logs, large rocks)   |
| 2 | [0-3] | D41 | <p><u>Edge of AU:</u> The characteristics of the edge between AU and uplands or adjacent wetlands.</p> <p><i>Choose the description that best fits the characteristics of the AU edge:</i></p> <p>0 There are <b>no differences in level</b> of vegetation height as reflected by vegetation classes on each side of the AU for more than 50% of the circumference: record a [0] <b>regardless of the sinuosity</b>.<br/>Examples: emergent (or herbaceous) to emergent (or herbaceous), shrub to shrub, forest to forest.</p> <p>1 There is a <b>difference of one level</b> in vegetation height as reflected by vegetation classes on each side of the AU and the <b>edge is straight</b> for more than 50% of the circumference: record a [1]. Example: emergent (or herbaceous) to shrub, shrub to forest</p> <p>2 There is a <b>difference of one level</b> in vegetation height as reflected by vegetation classes on each side of the AU and the <b>edge is sinuous</b> for more than 50% of the circumference: record a [2]. Examples: emergent (or herbaceous) to shrub, shrub to forest.</p> <p>2 There is a <b>difference of more than one level</b> of vegetation height as reflected by vegetation classes on each side of the AU and the <b>edge is straight: record a [2]</b>. Examples: emergent (or herbaceous) to forest, bryophytes to scrub/shrub or forest.</p> <p>3 There is a <b>difference of more than one level</b> of vegetation height as reflected by vegetation classes on each side of the AU and the <b>edge is sinuous: record a [3]</b>. Example: emergent (or herbaceous) to forest, bryophytes to scrub/shrub or forest.</p> <p>2 If <b>no single category</b> above extends for more than 50% of the circumference, and the <b>edge is straight: record a [2]</b></p> <p>3 If <b>no single category</b> above extends for more than 50% of the circumference, and the <b>edge is sinuous: record a [3]</b></p> |
| 2 | [0-5] | D42 | <p><u>Buffer of AU:</u> Choose the description that best represents condition of AU buffer</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>* Open water or adjacent wetlands are considered part of the buffer</p> <p>* Infrequently used gravel or paved roads or vegetated dikes in a relatively undisturbed buffer can be ignored as a "disturbance"</p> </div> <p>5 <u>100 m (330 ft)</u> of forest, scrub, relatively undisturbed grassland or open water &gt;95% of circumference. Clear-cut &gt;5 years old is OK. No developed areas within undisturbed part of buffer.</p> <p>4 <u>100 m (330 ft)</u> of forest, scrub, relatively undisturbed grassland or open water &gt;50% circumference OR 50 m (170 ft) of forest scrub, grassland or open water &gt;95% circumference. No developed areas within undisturbed part of buffer.</p> <p>3 <u>100 m (330 ft)</u> of forest, scrub, grassland or open water &gt;25% circumference, OR 50 m (170 ft) of forest, scrub, grassland or open water &gt;50% circumference.</p> <p>2 <u>No paved areas or buildings</u> within 25m (80 ft) of wetland &gt;95% circumference. Pasture or lawns are OK. OR no paved areas or buildings within 50m of wetland &gt;50% circumference</p> <p>0 <u>Vegetated buffers</u> are &lt;2 m wide (6.6 ft) for more than 95% of the circumference</p> <p>1 <u>Does not meet any of the criteria above</u></p>  |

Wetland Name:

AU ID#:

[0-3] D43

Corridors of AU: Rate corridors using following key (record rating of 0, 1, 2, or 3)

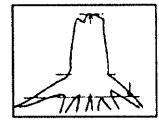
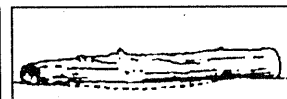
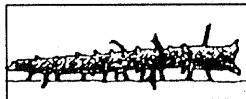
1. Is the AU part of a riparian corridor (see text for definitions)  
NO go to 5 YES go to 2
2. Is the wetland part of riparian corridor >50 m wide connecting 2 or more wetlands within 1 km with at least 30% shrub or forest cover in the corridor?  
NO go to 3 YES = [3]
3. Is the AU part of a riparian corridor 25-50 m wide connecting to other wetlands with at least 30% shrub or forest cover in the corridor?  
NO go to 4 YES = [2]
4. Is the AU part of a riparian corridor >5 m wide with relatively undisturbed veg. (grasslands, abandoned pasture are OK) that extends for more than 1 km?  
NO go to 5 YES = [1]
5. Is there a corridor >50 m wide with good (> 30%) cover of forest or shrub (> 2 m high) to natural upland area or open water that is > 100 ha in size?  
NO go to 6 YES = [3]
6. Is there a 10-50 m wide forest or shrub corridor to a relatively undisturbed upland or open water that is >10 ha?  
NO go to 7 YES = [2]
7. Is there a corridor of relatively undisturbed vegetation (grassland, abandoned pasture) >50 m wide to an undisturbed upland or open water that is >10 ha?  
NO go to 8 YES = [2]
8. Is there any vegetated corridor 5-50 m wide between the AU and any relatively undisturbed area or open water that is >2.5 ha?  
NO = [0] YES = [1]

3

[0-12] D44

# of categories of large woody debris in AU outside of perm. water

Freshly cut stumps are not included



Diameter  
10-20cm (4-8")  
21-50cm (8-20")  
>50 cm (>20")

Log Class 1

X

Log Class 2

X

Log Class 3

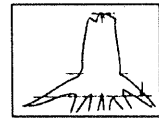
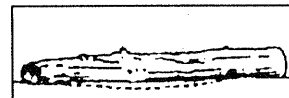
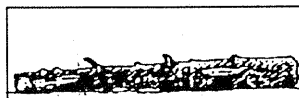
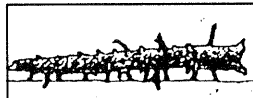
X

Stump


6

[0-12] D45

# of categories of large woody debris in permanent water of AU (may include aquatic bed areas)



Diameter  
10-20cm (4-8")  
21-50cm (8-20")  
>50 cm (>20")

Log Class 1

X
X

Log Class 2

X
X

Log Class 3

X
X

Stump




**Wetland Name:**

**AU ID#:**

**SOILS and SUBSTRATES**

**D46** Composition of AU surface

<u>1</u>	0/1	D46.1	Deciduous, broad-leaved, leaf litter
<u>1</u>	0/1	D46.2	Other plant litter
<u>1</u>	0/1	D46.3	Decomposed organic
<u>0</u>	0/1	D46.4	Exposed cobbles
<u>0</u>	0/1	D46.5	Exposed gravel
<u>0</u>	0/1	D46.6	Exposed sand
<u>0</u>	0/1	D46.7	Exposed silt
<u>0</u>	0/1	D46.8	Exposed clay

Record a 1 for each category present if its area is > 10 square meters. Note: bare earth from animal tunnels does NOT count.

**D47** Soils present in top (15 cm) of A horizon (record [1] if 1-49% area of AU, [2] if 50-95%, [3] if >95%)

<u>0</u>	[0-3]	D47.1	Peat
<u>0</u>	[0-3]	D47.2	Organic Muck
<u>3</u>	[0-3]	D47.3	Mineral with clay fraction <30%
<u>0</u>	[0-3]	D47.4	Clay (clay fraction >30%)

Record the least permeable layer if there are several down to 60 cm.

**D48** Infiltration rate of top 60 cm of soil in seasonally inundated areas

<u>0</u>	0/1	D48.1	Fast >50% gravel and cobble and the rest a sand, loamy sand, or sandy loam
<u>0</u>	0/1	D48.2	Moderate >50% sand and rest cobble, gravel, loamy sand, or sandy loam
<u>1</u>	0/1	D48.3	Slow - muck, peat, or loams (except sandy loam), <u>silts</u> , and clays

**D49** Substrate of streams

<u>0</u>	0/1	D49.1	Substrate of <b>permanent stream</b> or river in AU has at least 1 square meter of gravel
<u>0</u>	0/1	D49.2	Substrate of <b>permanent stream</b> or river in AU has at least 1 square meter of cobbles
	0/1	D49.3	Microdepressions in stream channel

**Judgements of Opportunity (Ratings of High, Medium, Low)**

<b>Rating</b>	<b>Functions</b>
<u>8</u>	Removing Sediments
<u>8</u>	Removing Nutrients
<u>7</u>	Removing Toxic Metals and Organics
<u>8</u>	Reducing Peak Flows
<u>8</u>	Reducing Downstream Erosion
<u>4</u>	Recharging Groundwater
<u>9</u>	General Habitat
<u>7</u>	Anadromous Fish Habitat