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Burke-Gilman Trail Missing Link Environmental Impact Statement Public Scoping Meeting Comments Summary

Introduction

This memorandum summarizes public comments received by the Seattle Department of Transportation (SDOT) during the scoping period for the proposed Burke-Gilman Trail Extension (Missing Link) project. The public comments were received by SDOT between July 17 and August 16, 2013 and provided to Environmental Science Associates (ESA) in 2014 and 2015. Information from public comments will be used to help inform SDOT in choosing the elements of the environment and the alternatives to be evaluated in a State Environmental Policy Act (SEPA) Environmental Impact Statement (EIS).

The Missing Link would connect two existing portions of the Burke-Gilman Trail (BGT) through the Ballard neighborhood to complete the regional facility. Currently, the regional trail ends at the intersection of 11th Avenue NW and NW 45th Street (on the east), and begins again at 30th Avenue NW at the Hiram M. Chittenden Locks (on the west). SDOT proposes to connect these two segments of the BGT with a marked, dedicated route for pedestrians and cyclists.

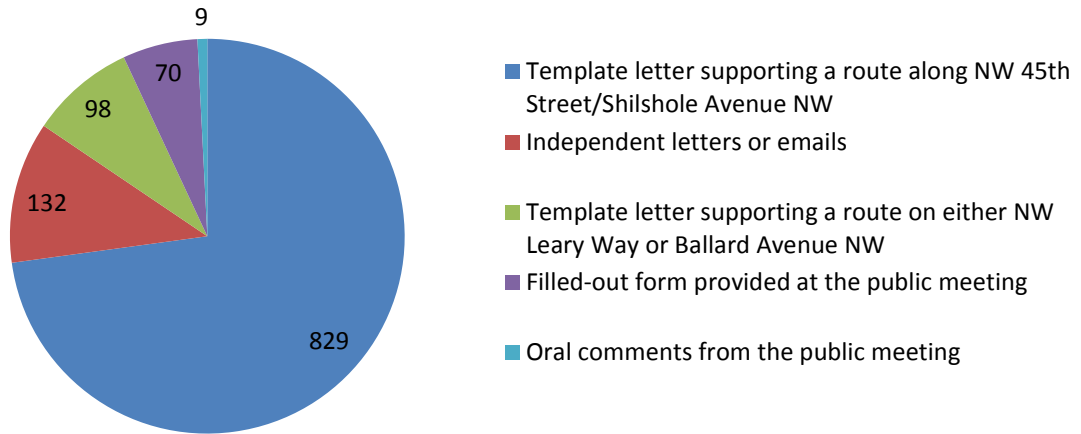
This project is one of the City of Seattle's (the City) top-rated trail priorities as identified by the Bicycle Master Plan (City of Seattle, 2014).

Scoping Comment Summary

Comment letters include oral testimonies received at the scoping open house held on August 8, 2013 at Ballard High School, as well as emails and mailed comment letters. Approximately 90 people attended the open house. The focus of the meeting was to obtain suggestions for build alternatives for the project and elements of the environment to be included in the EIS.

A total of 1,138 comment letters (including oral comments) were received during the scoping period, excluding duplicates. In addition to unique letters or emails, a letter template was used in support of a route along NW 45th Street and Shilshole Avenue NW. These comments were identical or substantively similar, as some commenters customized the template with personal experiences or unique concerns. Another letter template was used that expresses the concerns of some of the businesses along Shilshole Avenue NW. These letters largely supported the trail in a location away from the industrial area of Shilshole Avenue NW; either on Leary Way or Ballard Avenue NW. Figure 1 lists the types of comment letters received.

Figure 1. Number and Type of Comment Letters Received

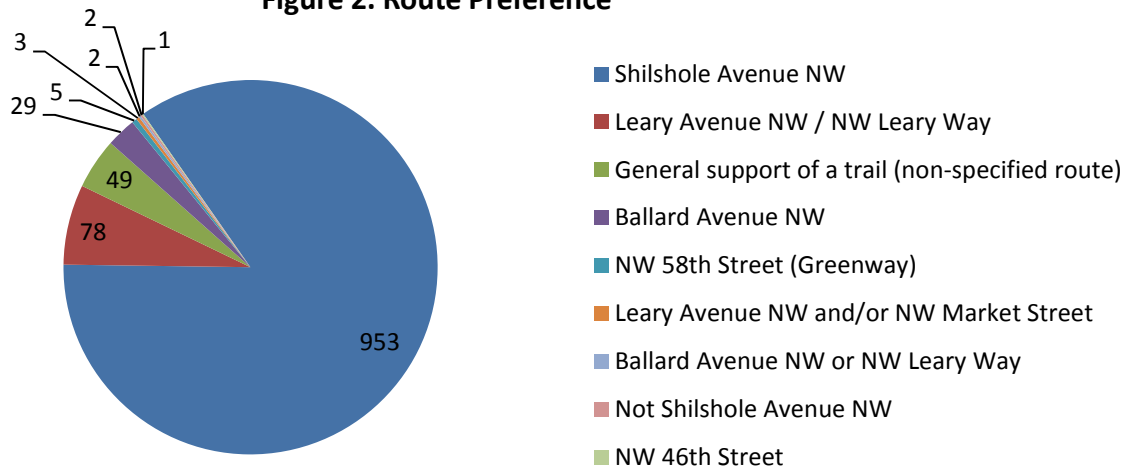


Preferred Location

All but 16 comment letters (98.6%) expressed support for completing the Missing Link of the BGT. Seven letters were opposed to the project altogether and nine letters had general comments but did not specify support or opposition to the project (see Project Concerns section below).

In this early phase of the project, SDOT has not yet chosen the alternatives to be evaluated in the EIS. Of the 1,122 comment letters that supported the project, most indicated a preferred route or partial route. Figure 2 summarizes the routes supported in the comment letters. The road segment that received the greatest preference was Shilshole Avenue NW, with Leary Avenue NW / NW Leary Way the second most popular. However, it is important to note that the 120 commenters who chose a street other than Shilshole Avenue NW, primarily did so because of their concerns about a trail along this roadway. Attachment 1 shows all the routes that were mentioned in scoping comments.

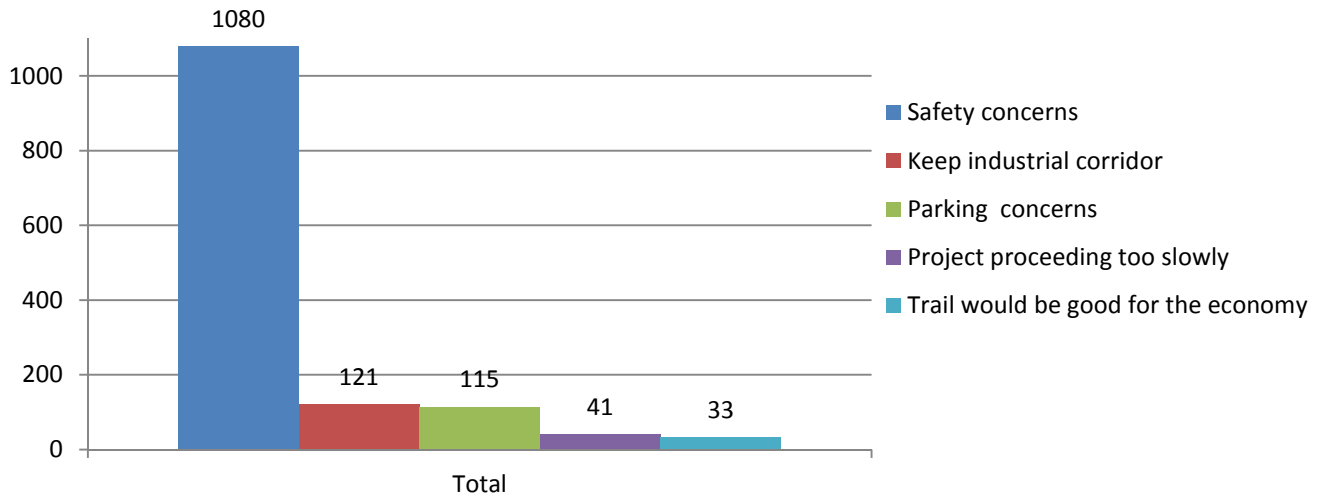
Figure 2. Route Preference



Project Concerns

Regardless of support or opposition to the project, safety was by far the most common concern expressed (1,080 comments). Figure 3 shows the most common comment topics made in the comment letters. (Note: Many comment letters discussed multiple topics.)

Figure 3. Counts of Leading Concerns or Comments Raised in the Comment Letters



Letters that did not support a trail along Shilshole Avenue NW stated it was unsafe to have the route along Shilshole Avenue NW because it is an industrial area. Supporters of the route along Shilshole Avenue NW stated that people are already bicycling along Shilshole Avenue NW, and thus it should be made safe. Numerous comments (121 comments) were made regarding the importance of the industrial area and/or freight corridor along Shilshole Avenue NW. There were 115 comments regarding parking. The loss of parking, like safety, was a concern of the public regardless of support or opposition for the project. Forty-one comments expressed planning fatigue, stating that the planning process was taking too long, and the trail should be built soon. There were 33 comments that the trail would be good for the economy; stating that a better cycling corridor would improve connectivity and bring people to the area. These were the most common comments; however, many other topics were raised in the comment letters. All of the following topics were raised at least once in the comment letters:

Concerns over Industry

- Need to maintain designated truck route
- The trail would result in economic loss to industry
- The trail would result in loss of industry and water-dependent businesses in Ballard / Seattle

Design Suggestions

- Need bicycle and pedestrian improvements on Ballard Bridge
- Access and connections for cyclists should be provided
- Need additional stop and yield signs
- Add tolls, charge cyclists
- A shared path would create conflicts between cyclists and pedestrians

- A cycle-track should be considered
- Construct overpasses and underpasses for the trail
- Keep the facility a separated trail
- Make Ballard Avenue NW one-way or closed to cars
- Use the rail-banked right-of-way

Environmental

- The Shoreline Management Act needs to be considered in planning
- Water quality, hazardous waste, dust, and contaminated soils would be a concern if the trail is built along Shilshole Avenue NW
- The trail would result in air quality benefits by reducing greenhouse gases and dust
- The trail would result in increased air pollution from idling cars and heavy trucks waiting for bicycles
- Shoreline restoration and drainage should be integrated into the project

Other Topics

- There would be increased traffic as the result of the trail
- There would be decreased traffic as the result of the trail
- Employment trends in Ballard should be studied
- The trail would violate the Growth Management Act
- There would be additional cars with the addition of residential development
- The trail would result in loss of historic resources
- There would be health benefits as a result of the trail
- The trail would bring local businesses and social opportunities (e.g., cafes)

Summary

Two themes were dominant in the comment letters: trail location and safety. Shilshole Avenue NW was the location most often indicated as preferred for the trail. When reasons were given for this preference, the most common reason was it is the most direct route between the two ends of the existing BGT. However, many comment letters were opposed to Shilshole Avenue NW as a route because it is an industrial corridor. These responses indicate the need to consider alternative routes to along Shilshole Avenue NW in order to examine the relative merits of routes that avoid or reduce impacts to the industrial area.

Both advocates and opponents of the trail expressed concern regarding the safety of cyclists, but had a difference of opinion about the likelihood that safety concerns could be addressed adequately. Safety is not itself an element of the environment to be reviewed under SEPA (Seattle Municipal Code 25.05). In addition, the analysis in an EIS is conducted at an early stage of design, such that it is not possible to examine all safety issues that would be resolved through detailed design. However, the high concern about safety expressed in the public comments indicated that sufficient detail regarding safety needs to be included in the EIS, such as industrial driveway crossings, and traffic hazards.

After safety, the next most cited concerns were over the effect the trail would have on industrial land uses, particularly along Shilshole Avenue NW, and the loss of parking. City and State land use policies strongly support maintaining industrial uses along the Ballard waterfront, thus the EIS should consider alternatives that are not immediately adjacent to industrial land uses, where feasible.

A wide variety of other comments were expressed in the comment letters regarding design suggestions, the environment, and other topics.

Scope of the EIS

The following summarizes the elements of the environment that should be evaluated in the EIS, based on comments received during scoping, and experience on similar projects.

Geology, Soils, and Hazardous Materials

No geological hazards are present in the project vicinity that would not be sufficiently addressed by compliance with City regulations. Contaminated soils are present in the project vicinity and would likely be disturbed to some extent during construction of some or all alternatives and some contamination would likely remain after construction. Such contamination is common in developed urban areas and best management practices are sufficient to address these concerns during construction. After construction, contamination risks along the constructed trail would be lower than at present. The EIS should focus on identifying known sources of contamination adjacent to the proposed trail alternatives, to provide a comparison of the known risks of having to clean up such contamination during construction.

Air Quality and Greenhouse Gas

Air quality issues and potential greenhouse gas emissions were identified as both positive and negative during the scoping process. Air quality issues such as toxic air emissions are a regional issue. The construction of the project would be small enough that it would not likely have significant impacts related to air quality. While the project could affect air toxics both positively and negatively due to a variety of factors, it is unlikely to make a measurable difference in the presence of air toxics in the long run; therefore, this issue need not be addressed in the EIS.

Greenhouse gas issues are a global issue. Effects from the project would likely be relatively minor given the small scale of the project relative to the global scale. However, the City has recognized that greenhouse gas impacts are cumulative; therefore, characterization of the relative scale of these impacts could help decision makers understand how a project of this type is likely to affect greenhouse gas emissions. The EIS should provide a qualitative assessment of potential impacts and benefits associated with the project both during and after construction, consistent with the City's guidelines for Greenhouse Gas Assessments for SEPA evaluations.

Fish and Wildlife

The project vicinity is adjacent to Salmon Bay, a freshwater area that supports several species on the federal Endangered Species Act list of threatened and endangered species, as well as species of concern identified by Washington state Department of Fish and Wildlife. Adverse impacts on water quality could affect these protected species. The project would result in soil disturbance and, depending on the design, could result in an increase in impervious surface, each of which has the potential to affect water resources. The City has regulations regarding control of sediment and stormwater runoff during and after construction; however, even with such regulations some impacts are possible. Therefore, the EIS should assess the potential for adverse impacts assuming compliance with grading and stormwater regulations.

Land and Shoreline Use

As discussed above, City and State land and shoreline use policies support maintaining water-related and water-dependent industries in the project area. Other policies generally support dense commercial and residential uses in Ballard and provision of alternative modes of transportation serving those uses. The EIS should focus on the land uses adjacent to trail routes whose vehicular access may be affected by the trail and assess what the likely effect of the trail would be on long-term land use patterns.

Economics

Although economic impacts are not a required element under SEPA, SDOT has determined that potential economic impacts should be evaluated. This analysis will focus on how different routes may adversely impact existing industrial, retail, residential, and other commercial uses. The economic analysis will be used when

assessing whether the project would be considered consistent with adopted land and shoreline use policies. As part of the SEPA EIS, SDOT does not intend to examine economic benefits of the trail, such as in a full cost-benefit analysis.

Recreation

The project is intended to serve as a regional recreational facility and is not expected to adversely affect recreation, but some alignments may serve recreational needs better than others. All alternatives evaluated should be considered viable routes for a regional trail. The EIS should focus on the differences in recreational benefits from each of the alternatives.

Public Services and Utilities

No major issues have been identified with regard to public services or utilities. It is possible that minor utility relocation could be required, such as drainage facilities if curbs are relocated or modified. Such relocations are common and can be accomplished without significant impacts on the utilities. Possible increases in impervious surfaces could require new infrastructure. Because of limited drainage infrastructure in the area, the EIS should focus on the effect of the project on drainage infrastructure.

Transportation and Parking

The project, while generally expected to benefit non-motorized transportation, could adversely affect vehicular transportation in several ways. The EIS should evaluate potential impacts on access to businesses and residences, on capacity of roadways and intersections, on traffic hazards, and on parking availability. Traffic hazards evaluated should include both those present now, and those potentially posed by the trail in each alternative location. The EIS should also examine any potential significant impacts on truck routes and areas where pedestrian circulation could be significantly affected by bicycle traffic on the trail. Particular attention should be paid to businesses that require access for large trucks and other vehicles in locations that would be affected by the proposed trail alternatives. This includes an assessment of what effects the trail could have on truck turning radii and sight distances, and what mitigation would be needed to ensure safe operation of both businesses and the trail.

Cultural Resources

Prior analysis of cultural resources (HRA, 2010) indicates that some areas have a high probability for prehistoric, ethnographic period, and historic Native American archaeological resources to exist in previously undisturbed areas, including beneath fill soils. However, no known resources are present, therefore there are no significant impacts expected on archaeological resources. Historic resources are present in the study area. The project could traverse the Ballard Avenue Landmark District (district), a district designated by the City as having historic significance. In addition, there are a number of historic age buildings along the corridors under consideration for the Missing Link. However, no buildings are expected to be affected by any of the alternatives, therefore no adverse effects on historic buildings are expected. Any changes proposed to street paving and configuration could affect the appearance of the streetscape, which in turn may affect the character of the district; such changes would be subject to approval by the Ballard Avenue Landmark District Board. The cultural resources analysis in the EIS should identify all designated landmarks and any historic age buildings inside and outside of the Landmark district, and any buildings listed on the National Register for Historic Places. The EIS analysis should focus on impacts from potential changes in streetscape character and whether such changes could adversely affect the district, any designated Landmark, or any buildings listed on the National Register for Historic Places.

Other Elements of the Environment

No other impacts on other elements of the environment are expected to be significant. This includes water resources, plants, energy and natural resources, noise, housing, aesthetics, and light and glare. While it is acknowledged that the project could have minor effects on these elements, the experience with similar projects leads to the conclusion that neither short- nor long-term impacts on these elements would be more than moderate. Therefore, these elements need not be evaluated in the EIS.

Issues from Scoping Comments Not Appropriate for SEPA Review

Several issues were raised during scoping that are not SEPA-related issues. These include comments about how the trail would be paid for (tolls, charging cyclists); employment trends in Ballard; and health benefits of the trail. While decision makers may wish to consider these issues, these issues will not be included in the EIS.

References

City of Seattle. 2014. *Seattle Bicycle Master Plan*. Accessed March 10, 2015. Available at <http://www.seattle.gov/transportation/bikemaster.htm>.

Historic Research Associates (HRA). 2010. *Cultural Resources Assessment of the Proposed Burke-Gilman Trail Extension Project, Segment 4, Seattle, King County, Washington*. September 2010.