

From: [Susan Black](#)
To: [SR 520 DEIS Comments](#);
CC:
Subject: Comments - Arboretum
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Attachments: [AF 520 final 9-26-06.doc](#)



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I-1186-001
Comment Summary:
Format and Content

Response:
See Section 23.1 of the 2006 Draft EIS Comment Response Report.

FINAL DRAFT: SR 520 DEIS RESPONSE FROM ARBORETUM FOUNDATION

10/30/2006

Paul Krueger, Environmental Manager
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101

Dear Mr. Krueger:

The Washington Park Arboretum is a treasure to the world, the nation and the City of Seattle. It is 230 acres of unique ecosystems, utilized daily by hundreds of people for experiencing, learning, and enjoying nature and its resources. The Arboretum is both a museum of living plants and a world-class park. The topography, wildlife, phenomenal collection of plants from around the world, trails, bridges, and Works Projects Administration (WPA)-built artifacts are an irreplaceable part of life in Seattle. Frederick Law Olmsted was the founder of American landscape architecture and portions of the Arboretum, including Lake Washington Boulevard, are premiere examples of his firm's work. The Arboretum is a part of the greater Olmsted Legacy in Seattle and a treasure we strive to protect for current and future generations. The Arboretum Foundation's mission is to protect, steward and expand the educational, social and cultural opportunities afforded by this unique and magical resource. Because of our responsibilities, we believe we hold an important role in decisions on replacing or expanding State Route 520. This letter represents the position of the Arboretum Foundation.

I-1186-001

We are very concerned with the inadequacies, omissions and biased analysis contained in the DEIS. The Arboretum Foundation understands the need for improving safety and longevity of the SR 520 corridor that traverses and bisects the Arboretum. Given the delays to finalize this document, we expected a balanced presentation of base options, alternatives and mitigations consistent with the mission of WSDOT. We are extremely disappointed by the inadequacy of the scientific, historic and engineering analysis, and the apparent preference for the alternatives with the most impact on the Arboretum.

We find that:

The EIS is flawed and inadequate.

There are so many unaddressed existing conditions and impacts of the project that we find we cannot assess impacts to the Arboretum. For example, the project base proposals are confused with mitigations. Mitigations are unevenly applied. Visual analysis cuts off Pacific Interchange visual assessment in every scenario, making analysis impossible and falsely suggesting a low visual impact. Traffic counts don't add correctly and are highly speculative, even though mechanisms are available to develop more accurate counts. Arboretum impacts

I-1186-001 | (wetlands, collections, MOHAI, visual, noise, odor, pollution, etc.) are uncouncted and potentially devastating.

I-1186-002 | **All options presented are unacceptable to the Arboretum Foundation.** All options present unacceptable negative impacts to the Arboretum, as they all include making permanent on/off ramps to Lake Washington Boulevard rather than utilizing and expanding existing capacity infrastructure to accommodate traffic. This is a two-lane park road, not a thoroughfare. The Pacific Interchange alternative that is the most negatively impacting option, proposes to remove existing capacity infrastructure and direct all southbound traffic through the Arboretum. Every option permanently and irreversibly alters the character of the original design concept underpinning the alignment, scale, and design of Lake Washington Boulevard. Proposed alternatives add as much as 50% more traffic to Lake Washington Boulevard, jeopardizing the safety of pedestrians, bicyclists and wildlife. With this traffic will come increased pollution damaging or destroying the plant collections and the enjoyment of park visitors in the Arboretum. All options threaten the very existence of the historic Wilcox Bridge (with its 9 foot clearance) and create extensive traffic and pollution conditions at the intersection of Lake Washington Boulevard and Madison Avenue. These impacts are not evaluated.

We have spent 8 years developing a Master Plan for the Arboretum and are just beginning its implementation. The Arboretum Foundation's ability to fully implement this Master Plan, our ability to carry out our education programs, and our ability to raise funds for perpetuation of the gardens and stewardship of the collections will be seriously impacted by the alternatives proposed for the expansion of SR 520.

I-1186-003 | We propose the following solutions and/or suggestions for further evaluation:

GENERAL COMMENTS

1. Recognize the historic qualities of the Arboretum and factor this into the evaluation. The Arboretum is eligible for standing on the National Register of Historic Places as a Cultural Landscape with historic elements. Actions against a potential nominee, whether or not it has been accepted, ought to consider the nominee as having been accepted to the register. In the DEIS, the Arboretum should have been identified as a potential Historic resource and analyzed accordingly.

I-1186-004 | **2. The Pacific Interchange Option has the most impact to the Arboretum.** The Arboretum is a living museum that has local, regional, national and international significance. The Olmsted Brothers Landscape Architecture firm from Brookline Massachusetts prepared the design for this section of Lake Washington Boulevard in the 1920s as a winding two-lane road for viewing the park. Its design capacity was 4,000 cars.

The Pacific Interchange Option completely removes nearby existing city streets and associated infrastructure from a developed urban area (Montlake), and directs all southbound traffic from the bridge onto this undersized, bucolic corridor through the Arboretum. The result will be a traffic nightmare, effectively creating an elongated on/off ramp that bisects the gardens and devastates the quiet and contemplative character of

I-1186-002

Comment Summary:

Arboretum (Concerns)

Response:

See Section 9.3 of the 2006 Draft EIS Comment Response Report.

I-1186-003

Comment Summary:

Olmstead Resources

Response:

See Section 11.2 of the 2006 Draft EIS Comment Response Report.

I-1186-004

Comment Summary:

Pacific Street Interchange Option

Response:

See Section 1.2 of the 2006 Draft EIS Comment Response Report.

I-1186-004	the Arboretum. Concentrated levels of carbon monoxide can also negatively impact population health.
	In addition, this option requires the permanent filling and shading of high-quality lake fringe wetlands, further threatening Arboretum collections (further discussed below). This option is not acceptable to the Arboretum Foundation as currently presented.
I-1186-005	TRAFFIC
	<p>3. Omit all proposed ramps to SR 520 from Lake Washington Boulevard. Study the modification of 23rd Avenue to accommodate city traffic. Ramps will be closed for 3-5 years during construction. People will find and establish new routes during this period. Lake Washington Boulevard is a low capacity corridor with a low bridge that does not allow busses or trucks to pass. It has inadequate drainage, no formal crossings, no sidewalk, and no expansion capacity. Runoff goes into the creek and directly pollutes the wetlands. We recommend that WSDOT evaluate the modification of 23rd Avenue south of the Montlake Bridge just as modifications to Montlake Boulevard north of the Bridge are recommended to accommodate traffic. This street (23rd Avenue) is a typical Seattle city street section with adequate curb, gutter, drainage and crossings already in place.</p>
I-1186-006	<p>4. Analyze 4-lane options with prioritized transit. Given the potentially devastating impacts to the Arboretum, WSDOT must do a better job of evaluating options that minimize the footprint of the corridor. WSDOT has not sufficiently analyzed a transit-focused scenario that could leave the footprint of the corridor substantially as it currently exists. None of the options presented promote modes of transportation other than single-occupancy vehicles. This is a serious oversight, with huge consequences to the Arboretum. Additionally, these options do not support our state and city policies towards sustainability.</p>
I-1186-007	<p>5. Analyze traffic congestion at the intersection of Lake Washington Boulevard and Madison Avenue. We believe the increased congestion will impact the Arboretum's collections and threaten the safety of people traveling to or through the Arboretum. Analysis of impacts to Lake Washington Boulevard through the Arboretum and at the Madison Avenue Intersection was never included, yet speeding or stalled traffic in the Arboretum is the single greatest threat to the health of the plant collections, to educational group and visitor safety and to overuse that may ultimately point to the need for expansion of this corridor. Enjoyment of the Japanese Garden is diminished by noise pollution. None of these impacts are shown or analyzed.</p>
	<p>6. Analyze traffic impacts at the intersection of Lake Washington Boulevard and the On/Off-ramp. We believe that the proposed stop light at the south end of the on/off ramps into the Arboretum will increase the threat to the plant collections and safety through the entire length of the park. Removing the stop signs may ease traffic backed up on the SR 520 bridge, but it also removes a significant disincentive to utilize these on/off ramps. With eased traffic more people will choose to use Lake Washington Boulevard, and perhaps even come to this corridor from others. This event would cause further traffic loading on Lake Washington Boulevard with further pollution and safety implications.</p>
I-1186-008	<p>7. Better evaluate the true need for expansion of the SR 520 corridor. Due specifically to the impacts to Foster Island and Marsh Island, the Arboretum Foundation</p>

I-1186-005

Comment Summary:

Arboretum Area (Local Streets)

Response:

See Section 5.3 of the 2006 Draft EIS Comment Response Report.

I-1186-006

Comment Summary:

4-Lane Alternative

Response:

See Section 1.2 of the 2006 Draft EIS Comment Response Report.

I-1186-007

Comment Summary:

Arboretum Area (Local Streets)

Response:

See Section 5.3 of the 2006 Draft EIS Comment Response Report.

I-1186-008

Comment Summary:

4-Lane Alternative

Response:

See Section 2.0 of the 2006 Draft EIS Comment Response Report.

I-1186-008	supports minimization of the footprint of the reconstructed SR 520 corridor. As an example, if the four-lane option were optimized for transit and the toll implemented as planned, would traffic be sufficiently reduced that a four lane bridge would accommodate the demand?
I-1186-009	<p>8. Better evaluate the impact to bicycle and pedestrian safety. Pedestrian safety and bicycle safety in the Arboretum on Lake Washington Boulevard was directly addressed in the Arboretum's Master Plan. Traffic on this corridor is increasing steadily, the speed limit does not seem to be a priority for enforcement through the park, and more and more people are entering from side streets to shortcut traffic congestion elsewhere. The overuse of this corridor should be addressed by the DEIS. The 2001 Arboretum Master Plan envisions pedestrian overpasses of Lake Washington Boulevard within the Arboretum in the spirit of Central Park, which was designed by the same designer of the Arboretum. These recommendations were to protect groups of children and adults enjoying the cultural and historic resource from existing levels of traffic on Lake Washington Boulevard, not the greater levels envisioned by this expansion. Current suggestions that this route remain permanent, that traffic be encouraged to more easily traverse the park and that access to the north end of the Boulevard be made easier, all argue against the adopted safety measures of the Arboretum's Master Plan. This DEIS should evaluate using other routes, instead of Lake Washington Boulevard, to accommodate the southbound traffic from the SR 520 bridge.</p>
I-1186-010	<p>9. Better evaluate the impact from air pollution. Air pollution is a well-documented threat to collections of plants in areas near and adjacent to freeways. While this has been studied repeatedly over time, it is a real and persistent threat to the collections at the Washington Park Arboretum. Air pollution is trapped in the Arboretum by the canopy of trees. This has a deleterious effect on those trees and the mycorrhizae within the soil profile. It also impacts water quality in the Arboretum and the pollinator species such as bees and humming birds. Air pollution is also a well-documented threat to population health. Recent studies shows increased cardiovascular disease and cancer in areas in close proximity to vehicle emissions. Another impact from the traffic on Lake Washington Boulevard is the generation of heat, odor and noise generated by vehicles. The heat contributes to the decline of vegetation surrounding the road. Noise and odor present not only distractions but health impacts to the visitor experience, particularly with children. It is well documented that noise can impact mental and physical health. Noise also impacts habitat for birds, fish and other species that occupy the lowlands, uplands, canopies and wetlands of the Arboretum. Pairs of eagles regularly nest in the Arboretum. As air pollution and particulate matter increase, wildlife will move from the Arboretum to other less noisy or polluted areas. This needs to be fully evaluated in the DEIS.</p>
I-1186-011	<p>ARBORETUM FOUNDATION MISSION</p> <hr/> <p>10. Evaluate the impacts of this proposal to the management of the Arboretum. The Arboretum Foundation was set to occupy the Museum of History and Industry (MOHI), per the Master Plan of 2001. Fund raising activities, education program development, exhibit space and lectures were to occur there. The DEIS does not discuss or evaluate the loss of this opportunity for the Arboretum or the Foundation. This facility contains amphitheater seating for lectures and shows, display and exhibit space and office space that the Arboretum Foundation looked forward to utilizing so that it could expand the range of educational services and programs as promised in the 2001 Master Plan adopted by the Seattle City Council. Needed office space in this facility was</p>

I-1186-009

Comment Summary:

Arboretum Area (Local Streets)

Response:

See Section 5.3 of the 2006 Draft EIS Comment Response Report.

I-1186-010

Comment Summary:

Health Impact Assessment

Response:

See Section 7.2 of the 2006 Draft EIS Comment Response Report.

I-1186-011

Comment Summary:

Property Acquisitions

Response:

See Section 6.1 of the 2006 Draft EIS Comment Response Report.

I-1186-011

to house additional staff and education programs. The auditorium in the MOHAI facility was planned to host events with people from around the world, celebrating the botanic collections, new eco-geographic gardens, display gardens staff and faculty that have made this an outstanding world-class facility and resource. We consider the loss of the use of this facility significant to the management of the education, outreach and programs of the Arboretum Foundation. It negatively impacts the Foundation's ability to raise funds for future capital improvements envisioned in the Arboretum's Master Plan.

Additionally, the DEIS does not evaluate other impacts to Arboretum Foundation education programs, including the loss of land, disruption of plant collections, loop trail interruption, and boardwalk removal.

I-1186-012

11. Better evaluate the impacts to the Arboretum collections. Plant collections in the areas to be impacted by the physical construction and final alignment of the proposed expansion of SR 520 include riparian under story and riparian over story (Betula, Populus, Nyssa, Salix, etc.) These are among the most striking and outstanding collections in the Arboretum for the purposes of demonstrating vegetative accommodation to varying hydrologic conditions, geologic conditions and aesthetic and practical uses in the region. While some of these species are native to the region and relatively easily replanted and grown in new conditions, others are rare, documentation is difficult and growth to specimen size is lengthy, difficult and expensive. Moving a collection is equally difficult and expensive. It is also unlikely to succeed in the circumstances, given the lengthy construction period, the pollution, dust and changing hydrologic conditions of the construction zone, and lengthy disruption to establishing a static natural condition on which most of these non-natives depend.

12. Better evaluate the impact to the Arboretum's role in education. The mission of the Arboretum Foundation is to support horticultural education. The expansion of SR 520, and the associated loss of wetlands, impacts to the plant collections in the area of Foster and Marsh Islands, and proposed increase in traffic through the length of the Arboretum, will severely hamper education programs, safety, circulation and passive appreciation of the resources. Speeding vehicles, traffic accidents and pollution are not consistent with study of the botanic collection, with Japanese Garden meditation, or giving lectures to classes in the field. In addition, a key part of the Arboretum pedestrian loop (the Marsh Island trail) is threatened. This trail provides a critical pedestrian linkage to the MOHAI portion of the Arboretum

I-1186-013

VISUAL IMPACTS FROM PROPOSALS

13. Show the Pacific Interchange alternative clearly and completely. The description of the Pacific Interchange Option is inadequate for reviewers to visualize the impacts. This bridge/interchange is cut off in the DEIS images, or is shown at the very edge of every graphic, thereby minimizing its height, support, volume and alignment. The full height of the interchange is not described anywhere in the DEIS, except that the underside will need to be 110 feet above the lake level where it crosses the navigable channel. The bridge/interchange suspension and support are never shown, nor are its slopes.

The Pacific Interchange option has the potential to mar any pleasing vista of Union Bay, including vistas from the Bay's southern edge in the Arboretum. The graphics and lack

I-1186-012

Comment Summary:

Arboretum (Concerns)

Response:

See Section 9.3 of the 2006 Draft EIS Comment Response Report.

I-1186-013

Comment Summary:

Pacific Street Interchange Option

Response:

See Section 1.2 of the 2006 Draft EIS Comment Response Report.

I-1186-013

of images in the DEIS create the illusion that the bridge/interchange will not be as visually impacting as it will be.

Thank you for the opportunity to comment on the DEIS for SR 520. We ask that, in your analysis of SR-520's impacts you acknowledge the very significant values and contributions for which the Washington Park Arboretum is locally, nationally and internationally renowned.

Sincerely,

Susan Black, Vice President
Arboretum Foundation Board of Directors