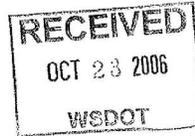




Paul Krueger, Environmental Manager
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101



Re: SR 520 DEIS RESPONSE FROM ARBORETUM FOUNDATION

Dear Mr. Krueger:

INTRODUCTION

Washington Park Arboretum is an internationally recognized treasure that all of us here in Western Washington have the benefit of enjoying and the responsibility to protect. It is a 230-acre classroom, park, and museum; it is home to a world-class plant collection, an Olmsted Legacy, Works Progress Administration-built artifacts, fragile habitat, and Seattle history. As a site eligible for standing on the National Register of Historic Places, impacts of the SR 520 project need to be carefully considered.

The Arboretum Foundation's mission is to protect the Arboretum – to preserve, steward and expand the botanical, educational, and recreational opportunities afforded by this unique and irreplaceable resource. This letter summarizes our position with regard to protecting the Arboretum from the impacts of the proposed SR 520 expansion. In short, we are concerned with the proposals contained in the DEIS and even more troubled by the lack of study done in certain key areas.

Our primary concerns and needs center around finding a *feasible and prudent option* that ensures there will be:

- 1) no net loss of publicly held parkland or currently accessible open space in the Arboretum
- 2) no net loss or impairment to the plant collection and wildlife or their future health
- 3) no increase of traffic traveling north/south through the Arboretum
- 4) a limited increase of traffic traveling east/west through the Arboretum's wetlands
- 5) no net loss of physical meeting and office facilities for the Arboretum Foundation and the other Arboretum partners' management and maintenance functions
- 6) no net increase to negative intangible conditions (e.g. visual, audio, air quality, light, green space, educational opportunities, or international reputation or significance).

DISCUSSION

Following are a series of comments connected with each of the foregoing primary concerns:

- 1) no net loss of publicly held parkland or currently accessible open space in the Arboretum

All options presented in the DEIS involve taking of parkland and open space, and the Pacific Interchange option is particularly onerous with the permanent filling and shading of high-quality lake fringe wetlands. Further, there has been inadequate (if any) study offered to assess the impacts imposed by the size and magnitude of proposed projects, especially the Pacific Interchange option, which has a magnitude and footprint well beyond any reasonably prudent option.

Preserving a Northwest Treasure

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C-011-001 Comment Summary: Arboretum (Concerns)

Response:

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

C-011-001

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- 2) no net loss or impairment to the plant collection and wildlife or their future health

As discussed above, the options proposed, (particularly the Pacific Interchange) result in the taking of land and open space as it relates to irreplaceable wetland and its contribution to the collection and wildlife. We believe the collection and wildlife habitat would be permanently impaired due to the taking.

Also, plant collections and habitat in the areas to be impacted by the construction and final alignment of the proposed SR 520 expansion include riparian understory and overstory (Betula, Populus, Nyssa, Salix, etc.). These are among the most striking and outstanding specimens in the Arboretum for the purposes of demonstrating vegetative accommodation to varying hydrologic conditions, geologic conditions and aesthetic and practical uses in the region. Many of these plants are rare, documentation difficult, and growth to specimen size lengthy, difficult and expensive. Moving a plant collection is equally difficult and expensive. It is also unlikely to succeed, given the lengthy construction period, pollution, dust and changing hydrologic conditions of the construction zone, and lengthy disruption to a static natural condition on which most of these non-natives depend.

Finally, the zone of impact of the DEIS needs to be redrawn at Madison Ave, and the impacts to the Arboretum evaluated in that light. The proposed traffic increase (50% or more) to Lake Washington Boulevard (LWB) exacerbates already high levels of air and water pollution to which the Arboretum is uniquely susceptible. The Arboretum's canopy traps air pollution and heat, and runoff from LWB flows directly into Arboretum Creek. The result would be immitigable in our preliminary assessments, and the DEIS appears generally not to have considered the impacts.

- 3) no increase of traffic traveling north/south through the Arboretum

All options presented effectively create an expressway through the Arboretum on LWB. LWB was originally designed for 4,000 trips each day, and currently accommodates 19,000. The four and six lane options presented would increase daily trips to 33,000, and the Pacific Interchange to as many as 53,000. The DEIS failed to study the impact of traffic along LWB. We believe the impact would be substantial, both the direct physical deterioration of the collection and environment, as well as the ongoing impacts of noise, sight and safety.

- 4) a limited increase of traffic traveling east/west through the Arboretum's wetlands

The options presented in the DEIS seem to directly encourage increased single-occupancy-vehicle travel east/west through the Arboretum's wetlands (particularly the Pacific Interchange option). We are not in favor of any option that causes greater air and water pollution impacting the Arboretum's wetlands. We are also not in favor of any option that causes an increase in other negative intangibles as discussed in issue #6, below. Finally, we urge that all partially built ramps which currently exist be removed.

C-011-001

- 5) no net loss of physical meeting and office facilities for the Arboretum Foundation and other direct partners to the Arboretum

The Arboretum Foundation was set to occupy the Museum of History and Industry (MOHAI) building, per the Seattle City Council-approved Master Plan of 2001. Fundraising activities, education program development and expansion, exhibits and lectures were to occur in the offices and auditorium there. The DEIS does not discuss or evaluate the loss of this opportunity for the Arboretum or the Foundation. We consider the loss of the use of this facility significant to the management of education, outreach and other programs. It also negatively impacts the Foundation's ability to raise funds for future capital improvements envisioned in the Master Plan.

- 6) no net increase to other negative intangible conditions (e.g. visual, audio, air quality, light, green space, educational opportunities, or international reputation or significance).

We believe that all options presented (especially the Pacific Interchange) will generate substantially more noise, heat, odor, visual impairment, safety hazards, and general chaos than currently exists in the Arboretum. Any distraction from the reasonable enjoyment, learning opportunity, and appreciation of this treasure is out of sync with the best interests of the Arboretum and its audience. We also believe the DEIS has not adequately studied these impacts.

CONCLUSION

As stewards of the Arboretum and all of its treasures, we:

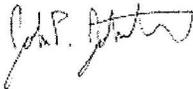
- 1) believe the best *feasible and prudent option* has not been identified and studied
- 2) believe the Pacific Interchange option is the most egregious offender
- 3) believe all options presented would result in net loss of land, collections, and usability
- 4) believe impacts to the Arboretum have been inadequately studied and reported on in the DEIS, and the zone of impact of the DEIS needs to be redrawn at Madison Ave with impacts to the Arboretum evaluated in that light.

Therefore, we call for:

- 1) elimination of the Pacific Interchange option in its current form from further consideration
- 2) identification and study of a more *feasible and prudent option*
- 3) greater study of the overall potential impacts to the Arboretum.

Thank you for the opportunity to comment on the DEIS for SR 520. We ask that you consider the Arboretum as precious as we do. We strongly believe that further analysis of impacts is required, and that the best option will involve substantially less impact to the Arboretum.

Sincerely,



John P Johnston, President
Arboretum Foundation