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C-002-001

October 31, 2006

Mr. Paul Krueger, Environmental Manager
SR520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101

RE: SR 520 Draft Environmental Impact Statement

Dear Mr. Krueger:

As longtime advocates for preserving the Olmsted Brothers' farsighted planning and design work for Seattle and a healthy park and open space system, we are deeply concerned about the inadequacies and harmful effects of the proposals for replacing the SR 520 Bridge. Analysis in the Draft Environmental Impact Statement (DEIS) for the project is incomplete and misleading. The so-called Pacific Interchange alternative will be particularly damaging to the Washington Park Arboretum, Lake Washington Boulevard, and other nearby Olmsted-designed and planned elements of Seattle's park and boulevard system. As it stands the DEIS does not provide the basis for making an informed decision about the alternative proposals.

C-002-002

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Lake Washington Boulevard (Boulevard) and the Washington Park Arboretum (Arboretum) are each significant for their direct associations with the Olmsted Brothers' early and late planning and design of the Seattle park and boulevard system. The Boulevard in Washington Park was among the first design projects undertaken after the 1903 Comprehensive Plan was accepted by the city; it was built according to the Olmsteds' design. The Arboretum was designed in the mid-1930s as last of the firm's projects in Seattle. Although both the Boulevard and Park have evolved in the intervening years, when considered in their entirety they retain their essential characteristics and reflect their historic design and nature. Each should be considered eligible for National Register listing. In addition the University of Washington Campus, the design of which was in significant part planned by the Olmsteds, also appears to be eligible for National Register listing.

C-002-003

Clearly the Park and Boulevard would be most severely harmed by the "Pacific Interchange six-lane alternative. Several other elements of the Olmsted legacy in Seattle would be adversely affected as well, including the Roanoke Overlook, Interlaken Park and Boulevard, and the University's Rainier Vista.

C-002-001

Comment Summary:

Format and Content

Response:

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

C-002-002

Comment Summary:

Olmstead Resources

Response:

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

C-002-003

Comment Summary:

Pacific Street Interchange Option

Response:

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

Mr. Paul Krueger
October 31, 2006
Page 2

C-002-004 The DEIS is deficient and misleading in several respects – the defined area of potential effect is much too narrow, several affected historic properties are either literally or effectively ignored, the analysis of adverse effect is limited and incomplete, and the 4(f) analysis does not address substantive adverse effects to historic resources.

C-002-005 **Definition and Use of APE**

The DEIS has identified a very narrowly drawn Area of Potential Effect (APE) and has seriously assessed an even smaller area, thereby avoiding consideration of significant adverse effects to historic resources. The APE nominally includes the Arboretum and portions of the Boulevard, but in practice is limited to what is called the “project area.” Page 69 of Appendix D even states that the Arboretum Aqueduct “is not within the project APE” even though the Aqueduct spans the Boulevard within the Arboretum. While this may be an inadvertent error, it indicates the extent of consideration that the Arboretum and Boulevard are given in the DEIS. Although the University of Washington Campus (UW Campus) will also be adversely affected by traffic and visual intrusion, it is excluded from the APE. The APE and analysis of adverse effects should be expanded to encompass the UW campus and should seriously consider effects to the entire Arboretum and Boulevard.

C-002-006 **Identification of Historic Properties**

The DEIS frequently states that the Arboretum has not been formally evaluated for listing in the National Register of Historic Places. The Boulevard, Seattle’s signature park boulevard, is neither identified nor discussed as an historic resource. As parts of the Olmsted-planned park and boulevard system, both were found eligible for listing in late 1998, in response to an inquiry from Sound Transit (see enclosed November 2, 1998 letter to Sound Transit from the Office of Archaeology and Historic Preservation).

As the DEIS notes, Lake Washington Park, and later the Arboretum, included all of Foster Island and the lagoon areas to the south. Subsequent historic WPA-era plantings were also made in the northern section of the Arboretum. As a result, all of these areas constitute a larger historic cultural landscape that must be considered in the Section 106 process, regardless of current ownership. The DEIS does not do this, nor does it properly consider the integrity of the entire resource, focusing instead only on the portion within the narrowly drawn “project area.”

The UW Campus, a designed historic landscape dating from the late 1890s and including elements of the Alaska-Yukon Pacific Exposition of 1909, will be adversely affected by traffic and visual intrusion. The UW Campus has not been considered as an historic property.

Assessment of Adverse Effects

As noted above, the DEIS does not seriously consider adverse effects to several historic properties – the entire Arboretum, the Boulevard, and the UW campus. These potential effects are numerous and significant.

C-002-004

Comment Summary:

Section 106 Process

Response:

See Section 11.1 of the 2006 Draft EIS Comment Response Report.

C-002-005

Comment Summary:

Olmstead Resources

Response:

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

C-002-006

Comment Summary:

Olmstead Resources

Response:

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

C-002-007

Traffic analysis in the DEIS underestimates volumes on Lake Washington Boulevard, particularly the “Pacific Interchange” alternative, which would create a new north-south route from the University to Madison Street via the Boulevard, carrying traffic which now uses 23rd Avenue. It is difficult to imagine that traffic loads would not be significantly affected by the proposed alternatives, since all SR 520 traffic and traffic to and from the south would be carried by the Boulevard rather than being shared with 23rd Avenue. In addition to bridge traffic, north-south traffic unrelated to SR520 would also be carried over the interchange bridge. Idle time due to bottlenecks at Madison Street would increase the adverse effects of traffic to the Arboretum.

C-002-008

Heavy traffic, noise, glare and water and air pollution along the Boulevard are already significant impediments to the ongoing functions and health of the Arboretum’s collections and its educational and recreational activities. Recreational and student users have difficulty crossing the Boulevard at many times of day and the Arboretum’s plant collections are being damaged by air pollution, and, occasionally, collisions. Increasingly degraded runoff would continue to drain directly into the Duck Bay wetlands from Arboretum Creek. Increased traffic would increase all of these adverse effects. The Boulevard is a designated park boulevard. It is completely inappropriate for use as a traffic arterial or collector. Even its current traffic volume conflicts with the Boulevard’s scenic and historic character, adjacent historic and park resources, and its small scale and capacity.

C-002-009

Visual simulations in the DEIS misrepresent the scale, appearance and intrusive visual impacts of the project, particularly the “Pacific Interchange” alternative. The viewshed defined for analysis (Visual Quality and Aesthetics, p. 13 and Exhibit 5) seriously underestimates what will be viewed from the southern UW campus and from the northern end of the Arboretum and the Boulevard, especially during the many years that are required for removed vegetation to return to mature sizes. The viewpoints chosen for simulations are either at a great distance or very close to the roadway, leaving out views in which intrusion will be most apparent – from the UW Boathouse and the northern portion of the Boulevard, among others. The Visual Quality Addendum contains no simulations, even though the “Pacific Interchange” alternative requires the broadest and highest bridges and is thus the most intrusive. Furthermore, the Addendum states that the Second Montlake Bridge alternative would have greater adverse visual effects than the “Pacific Interchange” alternative. This comparison grossly overemphasizes proximity to the Montlake Bridge while underemphasizing the much wider intrusive effects of the “Pacific Interchange” alternative. The Addendum’s analysis provides neither illustrations nor substantive justification. (Appendix S, pages 1 and 16)

C-002-010

Cumulative effects are not properly considered. As noted earlier, heavy traffic and air pollution already pose major threats to the ongoing functions and health of the Arboretum’s collections and its educational and recreational functions. Even small increases would have disproportionate cumulative impacts to these aspects of the historic properties affected.

C-002-011

In sum, the DEIS should be revised to accurately consider the full range of affected historic resources and the extent and nature of all significant adverse effects.

C-002-007

Comment Summary:

Arboretum Area (Local Streets)

Response:

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

C-002-008

Comment Summary:

Arboretum (Concerns)

Response:

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

C-002-009

Comment Summary:

Visual Quality Effects

Response:

See Section 10.1 of the 2006 Draft EIS Comment Response Report.

C-002-010

Comment Summary:

Indirect and Cumulative Effects Methods of Analysis

Response:

See Section 20.1 of the 2006 Draft EIS Comment Response Report.

C-002-011

Comment Summary:

Olmstead Resources

C-002-012 Section 4(f) Analysis

The 4(f) analysis in the DEIS neglects to analyze adverse effects to ignored and minimally considered historic resources.

Some of the proposed alternatives significantly underestimate their effective land 'take' because they require relocation to the Arboretum of uses that would otherwise occupy the Museum of History and Industry facilities, as proposed on page 51 of the Addendum to Appendix P. In addition, the Boulevard, which is owned by Seattle Parks and Recreation, is a park boulevard and thus must be considered as park land. Increased traffic loads which affect its ability to function as a park boulevard constitute constructive use for road purposes. Neither of these constructive uses of historic properties is considered in the 4(f) analysis. The Addendum to Appendix P repeatedly states that the adverse effects of the 6 lane alternatives, including the "Pacific Interchange" alternative, are the same, despite the addition of north-south traffic over the interchange bridge.

C-002-013 Although the DEIS and 4(f) analysis claim that there is no net loss of park land if the current ramps are removed, restored and returned to park use, it neglects to note that the environmental functions of the restored areas will not offer comparable natural functions or habitat for many years, nor will the increase in covered water area be mitigated by such restoration. Although natural functions are not "historic" in the usual sense, Washington Park and the Arboretum were designed to provide a rich range of opportunities for enjoyment and study of the natural world. The loss of such richness is thus detrimental to the historic character, design, feeling and intended use of the historic properties.

Given the incompleteness of the 4(f) analysis, a de minimis finding, as suggested on page 45 of the Addendum, seems entirely inappropriate.

C-002-014 FSOP and other groups have requested that alternatives without ramps from the Arboretum be analyzed, but the DEIS dismisses this possibility without substantive discussion. Closure of the Arboretum ramps would remedy the majority of adverse effects to the Arboretum and Boulevard but has been rejected out of hand in the DEIS for political rather than substantive reasons – because it would not be accepted by some in the Montlake neighborhood. Elimination of the Arboretum ramps, a simple and feasible measure that would reduce costs and eliminate the most damaging impacts to the city's park and boulevard system, should be included in all alternatives. A broader set of alternatives would also be welcome, since those addressed in the DEIS all have serious shortcomings.

C-002-015 The Friends of Seattle's Olmsted Parks (FSOP) requests that a thorough Section 106 review be conducted to assess the effects of the SR 520 Project on Washington Park and Arboretum, Lake Washington Boulevard and the University of Washington Campus, each of which is adversely affected by all proposed SR 520 alternatives. We also request that FSOP be included as a

Response:

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

C-002-012

Comment Summary:

Section 4(f)

Response:

See Section 21 of the 2006 Draft EIS Comment Response Report.

C-002-013

Comment Summary:

Section 4(f)

Response:

See Section 21 of the 2006 Draft EIS Comment Response Report.

C-002-014

Comment Summary:

6-Lane Alternative

Response:

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

C-002-015

Comment Summary:

Olmstead Resources

Response:

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

Mr. Paul Krueger
October 31, 2006
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C-002-015

consulting party in the Section 106 process and any related Memorandum of Agreement or Programmatic Agreement, in accordance with the provisions of 36CFR Part 800.2(c)(5), which call for the participation of organizations with a demonstrated interest in an undertaking's effects on historic properties.

Thank you for your attention to the significant omissions, factual errors and misjudgments in the draft DEIS as noted above. We look forward to a corrected and comprehensive revision of the draft.

On behalf of the Board of Directors,

A handwritten signature in black ink, appearing to read "D. E. Jackson", with a long horizontal line extending to the right.

Douglas E. Jackson
President

Enclosure: November 2, 1998 letter from Greg Griffith, Washington State Office of Archaeology and Historic Preservation, to James Irish, Sound Transit

cc: Governor Christine Gregoire, State of Washington
Mayor Greg Nickels, City of Seattle
James Leonard, Federal Highway Administration
Allyson Brooks, Washington State Historic Preservation Officer
Karen Gordon, Seattle Historic Preservation Officer
Seattle Landmarks Preservation Board



STATE OF WASHINGTON

DEPARTMENT OF COMMUNITY, TRADE AND ECONOMIC DEVELOPMENT
Office of Archaeology and Historic Preservation

420 Golf Club Road SE, Suite 201, Lacey • PO Box 48343 • Olympia, Washington 98504-8343 • (360) 407-0752
Fax Number (360) 407-6217

November 2, 1998

Mr. James Irish
Sound Transit
1100 Second Avenue, Suite 500
Seattle, Washington 98101-3423

In future correspondence please refer to:
Log: 050598-09-FTA
Re: Central Link Light Rail Transit
Project Determinations of Eligibility

Dear Mr. Irish:

On behalf of the Washington State Office of Archaeology and Historic Preservation (OAHP) I have completed my review of the historic properties identified as within the area potentially affected by the Central Link Light Rail Transit Project. By my count, this review includes 78 Historic Property Inventory Forms which in turn has included several historic districts and one multiple property resource, the Olmsted Park system. These properties represent a diverse range of property types and a substantial collection of some of the region's most historically significant and architecturally distinguished structures.

As a result of this review, I concur that all the properties submitted to OAHP to date are eligible for listing in the National Register of Historic Places. This concurrence includes the Olmsted Park System; the Roanoke Park, Federal Avenue, and Fraternity/Sorority Row historic district; and the Columbia City Historic District expansion. I note that the Seattle-First National Bank Building at 566 Denny Way (B85) is less than 50 years of age. At this point, it does not meet the test for exceptional significance for properties which have yet to reach the 50 year age threshold for National Register consideration. However, it is my opinion that the building will be eligible by the year 2000 when it will reach the 50 year age threshold. Therefore, it would be prudent for Sound Transit to incorporate this property into its project planning process.

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