







**DATE:** June 29, 2011

**TO:** Stephanie Brown, Seattle Department of Transportation

**FROM:** David Graves, AICP, Senior Planner

**SUBJECT:** SR 520 Final Environmental Impact Statement

Attached are comments of Seattle Parks and Recreation on the SR 520, I-5 to Medina Bridge Replacement and HOV Project Final Environmental Impact Statement. The purpose of this memo is to highlight issues of substantial significance which should be addressed as the project moves forward.

### **Background**

If implemented, proposed upgrades to State Route 520 will have significant impacts to a number of Seattle parks over a span of years, and a base set of impacts for the life of the freeway corridor. There will be impacts to park resources protected under Section 4(f) of the Federal Highway Administration legislation associated with the SR 520 project. There will be impacts to park resources protected under Section 6(f) of the Land and Water Conservation Fund legislation associated with the SR 520 project. There will be a loss of park property, both temporarily during construction and permanently as the right-of-way is expanded to accommodate the expanded highway. Finally, there will be a loss of to park resources protected under the City's Initiative 42, Ordinance No. 118477.

City of Seattle park resources under the jurisdiction of the Superintendent of Seattle Parks and Recreation that will be directly impacted by the SR 520 project include Bagley Viewpoint, Montlake Playfield and the associated submerged lands, Lake Washington Boulevard, East Montlake and McCurdy Parks and the Washington Park Arboretum (Arboretum). City of Seattle park resources under the jurisdiction of the Superintendent of Seattle Parks & Recreation that will be indirectly impacted by the SR 520 project include Roanoke Park, West Montlake Park and Lake Washington Boulevard. As such, appropriate mitigation of the project impacts is warranted and necessary.

## Comments

Seattle Parks and Recreation (Parks) respectfully submits the following comments in response to the Final Environmental Impact Statement (FEIS) for the I-5 to Medina: Bridge Replacement and HOV Project issued on June 17, 2011:

- **WSDOT Peninsula** – With the removal of the Lake Washington Boulevard access ramps, the opportunity is presented to return this area to City ownership and restore the north entrance to the Arboretum in the area commonly referred to as the “WSDOT Peninsula”. WSDOT has identified in the FEIS that this area could be returned to the City. Prior to the original construction of SR 520, it was part of the Arboretum. This land must remain in public ownership and should be transferred to the City to be reincorporated into the Arboretum.
- **Construction Impacts** – Construction of the segment from Montlake Boulevard to the west highrise will take many years. During this time access to the north part of the Arboretum, Foster and Marsh Islands and East Montlake Park will be limited and through travel will be constrained by temporary work bridges. All efforts to safe ensure public access to and between the Arboretum and East Montlake park during construction must made.

Visitors to parks within the Westside corridor will be subject to construction traffic, noise and dust. Every effort must be made to ensure that visitors to Roanoke Park, Interlaken Park, Montlake Playfield, West Montlake Park, East Montlake Park and the Washington Park Arboretum are protected to the maximum extent possible from having the proposed highway project intrude on their recreational experience.

- **Loss of park lands** – The FEIS indicates a permanent loss of 5.0 acres of upland and 1.0 acre of submerged land of City-owned park property and temporary use of an additional 3.3 acres of upland and 2.9 acres of submerged land of City-owned park property. Permanent acquisition will require payment for the fair market value of the property; temporary use will require compensation equal to the value of the construction easement. Note also that a revocable use permit will be required for all work on Parks’ property not covered under a temporary construction easement.
- **General Mitigation** – Sections 4f and 6f each have specific mitigation requirements which must be met. Additional Federal, State and local regulations also have specific mitigation requirements. Discussions are ongoing between the City and WSDOT on a variety of mitigation opportunities and proposals. Full and complete mitigation for all project impacts must be provided.

Thank you for the opportunity to review and comment on the Final Environmental Impact Statement for the I-5 to Medina: Bridge Replacement and HOV Project.

## **Additional Information**

If you any questions regarding the SR520 project, please contact David Graves at 684-7048 or e-mail to [david.graves@seattle.gov](mailto:david.graves@seattle.gov).