



September 28, 2006

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

Dear Mr. Krueger:

O-018-001

The Battery Park City Parks Conservancy has learned with alarm of proposals being put forward by the Washington State Department of Transportation with regard to the replacement of the SR 520 floating bridge and its effects on adjacent roads and lands on the western shores of Lake Washington in Seattle. I refer particularly to the impact on Washington Park Arboretum which stewards a number of valuable tree collections of international significance. Current bridge construction that would take Arboretum land, sacrifice indispensable collections, and threaten wetland habitat needs to be re-assessed in light of what is at risk. We therefore wish to comment on the Draft Environmental Impact Statement made available on [www.SR520DEIScomments.com](http://www.SR520DEIScomments.com).

The layout of this Arboretum represents a significant cultural landscape, having been designed by the renowned Frederick Law Olmsted landscape architecture firm at the beginning of the last century as a crucial component of their vision for the boulevard and park network for Seattle. The Arboretum now forms the southern limb of UW Botanic Gardens [[www.uwbotanicgardens.org](http://www.uwbotanicgardens.org)] which also include sensitive shoreline wetlands and a nature reserve (Union Bay Natural Area), and the Union Bay Gardens surrounding Merrill Hall (Center for Urban Horticulture) to the north of SR520. The Arboretum alone is the largest open green space in the central metropolitan area of Seattle and provides an invaluable park experience for local people as well as visitors to the city, attracting 250,000 visitors a year.

The Arboretum is the *only* botanical institution in Washington to be officially designated a State Arboretum. The tree collections are in the very top tier of North American botanic gardens and arboreta, and have international significance to the preservation of biodiversity and our horticultural heritage. Among these well-documented holdings, the Arboretum's collections of oaks, maples, hollies have been recognized by the North American Plant Collections Consortium, a major new conservation and stewardship initiative of the American Public Gardens Association. It is our firm contention, therefore, that any development that impinges on this national treasure must be assessed with the greatest care and consideration for future generations.

This is not a new struggle for the Arboretum. In the 1960s, the northern part of the Arboretum and the Montlake neighborhood was sliced through east-west by SR 520. Only after huge public process were plans for a further highway running north-south through the Arboretum

2 SOUTH END AVENUE NEW YORK, NEW YORK 10280 TELEPHONE 212 267 9700 FAX 212 267 9707 E-MAIL [info@bpcparks.org](mailto:info@bpcparks.org)

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**Comment Summary:**

Arboretum (Concerns)

**Response:**

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

abandoned. Proposals on the table today present an equally dismaying series of options, which, if implemented, will adversely impact the most ecologically sensitive parts of the Arboretum, notably the wetlands lying at their heart. Furthermore, currently the elevation of SR 520 lies largely at a low level near the Arboretum. Proposals include raising it to 50-70 feet above the waterline [DEIS p. 5-7], which will cause a significantly increased visual intrusion into more of the Botanic Gardens.

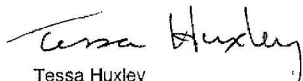
One alternative now proposed [DEIS p. 5-27] includes a 400-foot wide "footprint" over the western approaches to the Arboretum. Another option [DEIS p. 5-32] calls for a large intersection over the wetlands and, from that, a 200-foot high bridge leading northwards to the main campus of the University. This major intersection in the heart of the Botanic Gardens would funnel increased [DEIS 5-32] traffic down into the present-day northern part of the Arboretum then onto Lake Washington Boulevard, one of the Olmsted's most important thoroughfares in Seattle. The impact on the Arboretum and its users as a whole would be devastating.

BPCPC is concerned that construction will take 4.5 years [DEIS p. 8-10] and involve the building of a temporary bridge on Arboretum land, but that no meaningful traffic plan through the Arboretum for the construction period has been presented [p. 8-8]. Despite requests by most neighborhood communities to have an independent assessment of alternative construction modes commissioned, notably a tube-tunnel option, those requests have not been entertained.

We believe strongly that an independent study should be commissioned to assess the effects of such a system and thoroughly examine alternative construction modes, such as a tube-tunnel, be developed. Viable alternatives should not involve an out-of-proportion scale of the proposed developments and their detrimental visual impact, the shading of the Arboretum, traffic noise, and the effects on salmon passing through waters surrounded by the Botanic Gardens. Implementation of such a scheme would also allow not only the Arboretum to be returned to the original Olmsted vision, but also restore tranquility to the Botanic Gardens as a whole - as well as to the adjoining neighborhoods.

The integrity of the Washington Park Arboretum and its valuable collections, green space, and wildlife habitat in a major metropolitan city should be preserved. In the national interest, we urge you to consider these issues.

Sincerely,



Tessa Huxley  
Executive Director