



October 30, 2006

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



Dear Mr. Krueger:

General Comments

Thank you for the opportunity to comment on the DEIS for the SR 520 bridge replacement project. Seattle Audubon is one of the oldest Audubon chapters in the country started in 1916. We currently represent over 5,500 members and take extreme pride in our mission to cultivate and lead a community that values and protects birds and the natural environment. In fulfilling this mission we strongly believe in seeking balanced solutions to difficult problems, especially in our urban environments.

There is no better example for the need of a balanced and smart approach than when dealing with transportation projects. Most transportation projects bring unprecedented impacts to local neighborhoods, a fact that is undeniable. Most of these impacts are viewed as necessary evils and part of progress. These impacts also usually result in mitigation packages in the millions of dollars. Seattle Audubon strongly believes that we can avoid some of the most damaging impacts that would result through a planning process that deals honestly with all aspects of the transportation project. This honest approach must be holistic and take into account cumulative impacts and more importantly unintended consequences that may result.

We would like to start our letter with three key facts that we believe are undeniable and critical to the SR 520 replacement project.

1. The SR 520 Bridge needs to be replaced. The safety concerns over Earthquake damage and the potential for catastrophic failure is undeniable.
2. There are current areas near the SR 520 bridge infrastructure that provide unique opportunities for people, wildlife and cars to coexist. On any given weekend (rain or shine) there are numerous hikers, canoeists, arboretum visitors, dog walkers, birdwatchers, picnickers and families who visit the area near Foster / Marsh Island and the Arboretum. The Foster / Marsh Island wetland complex is a critical place in the region for wildlife and people. If we value this area we should seek a SR 520 alternative that **avoids** impacts as much as possible rather than **mitigate** impacts to this highly utilized asset.

C-030-001

Comment Summary:

Indirect and Cumulative Effects Methods of Analysis

Response:

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

C-030-002

Comment Summary:

Alternatives Development

Response:

See Section 1.1 of the 2006 Draft EIS Comment Response Report.

C-030-003

Comment Summary:

Wetland Mitigation

Response:

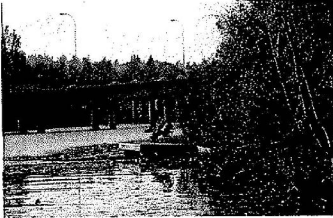
See Section 16.1 of the 2006 Draft EIS Comment Response Report.

C-030-001

C-030-002

C-030-003

C-030-003



Nature Viewing Near Marsh Island



Entry to Marsh Island Trail



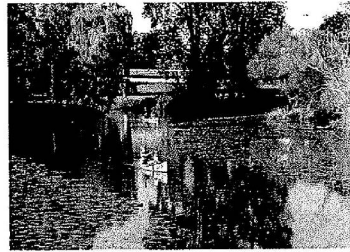
Canoeing and Walking through Marsh Island Wetland Complex



Wood Ducks in the wetlands



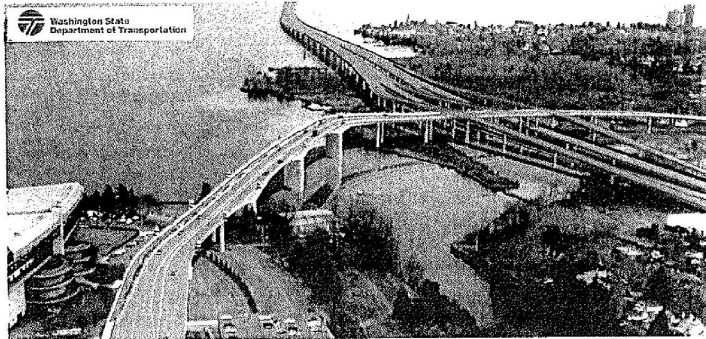
WSDOT Peninsula



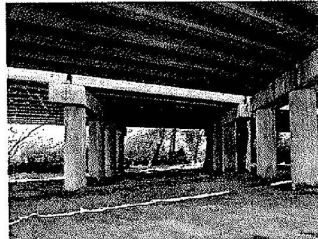
Foster Island Wetland Complex near the Peninsula

C-030-004

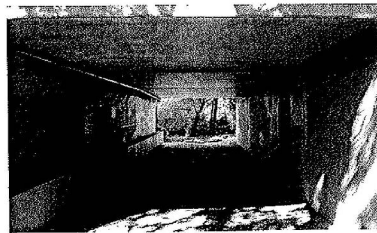
3. No matter what alternative is chosen there will be dramatic impacts to the Foster / Marsh Island wetland complex and the experience of visitors to this regional recreational destination. Nowhere in the DEIS is there a discussion of how this highly visited and important recreational destination will be impacted. This becomes a critical point given the emergence of the Pacific Street Interchange Alternative (PSI) and the dramatic impacts this alternative will have on this entire regional destination.



WSDOT Generated Image of Pacific Street Interchange (PSI)



Existing SR 520 Ramps in Arboretum



Existing SR 520 Tunnel: Main Line

C-030-004

Comment Summary:

Pacific Street Interchange Option

Response:

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

Given the three points above Seattle Audubon strongly suggest the following four action steps. We will elaborate on each issue throughout our letter.

- C-030-005
- C-030-006
- C-030-007
- C-030-008
1. Drop the Pacific Street Interchange Alternative from the list of potential preferred alternatives.
 2. Further research the performance and technical needs of the stormwater treatment basins, the likely impacts from shading, the impacts on Great Blue Heron critical habitat and the true amount of habitat lost as a result of overhead infrastructure. The DEIS does not adequately address these issues.
 3. Develop and discuss a draft mitigation package before a final preferred alternative is locked in. This mitigation must address monetary and maintenance needs for a long-term commitment and success of mitigation measures.
 4. Conduct a complete Section 106 on all historically significant areas and a more thorough investigation of potential impacts to visitors of the Arboretum, Marsh Island, University of Washington Aquatics Center, Foster Island and the pedestrian corridor at Pacific Street. We feel the DEIS does not do an adequate job of determining and discussing impacts to visitors of these critical places.

C-030-009

Our intention in asking for clarification and further investigation on these points is simply to acknowledge that while important the SR 520 bridge replacement project is not a stand alone entity. It is a massive piece of infrastructure that will dominate the scene and impact citizens. The proposed infrastructure will cross over, bisect and permanently remove areas of Foster Island, Marsh Island and currently used green space near the Arboretum. In a truly **context sensitive design** approach impacts to these public areas should be treated with care and sensitivity. According to the Federal Highway Administration context sensitive design is part of the *vital few goal on environmental stewardship and streamlining*.

“Environmental Streamlining drives us to improve project delivery without compromising environmental protection. Environmental Stewardship helps demonstrate that we are mindful of the natural and human environment while addressing mobility and safety needs of the public. FHWA promotes actions that show we are responsible stewards of the environment. We take advantage of opportunities to enhance environmental protection and encourage partnerships that promote eco-system conservation or encourage broader mitigation strategies that seek corridor or watershed based approaches. Environmental Streamlining solutions must go hand in hand with principles of stewardship.” FHWA website, 2006

Context sensitive design is about incorporating new and often massive infrastructure into the existing landscape with the least amount of impact. We are asking WSDOT to take another look at the alternatives with the **context** of the Foster / Marsh Island wetland complex in mind.

C-030-005

Comment Summary:

Pacific Street Interchange Option

Response:

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

C-030-006

Comment Summary:

Wildlife Effects

Response:

See Section 16.2 of the 2006 Draft EIS Comment Response Report.

C-030-007

Comment Summary:

Project Costs

Response:

See Section 3.1 of the 2006 Draft EIS Comment Response Report.

C-030-008

Comment Summary:

Section 106 Process

Response:

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

C-030-009

Comment Summary:

Context Sensitive Solutions

C-030-010

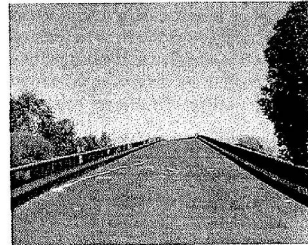
Alternatives

Seattle Audubon has not officially endorsed a single alternative for the SR 520 replacement. We have chosen not to select a single preferred alternative because we believe any alternative is going to have dramatic impacts on the environment in the area. As a result we strongly feel that a significant mitigation package will be needed to ameliorate the unavoidable impacts to the area. This mitigation package must account for not only the habitat lost but also the degradation of the quality of the experience of visitors to the Foster / Marsh Island wetland complex.

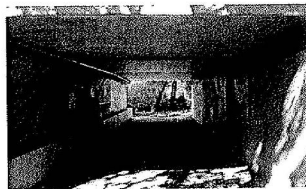
Any alternative will add significant width to the existing roadway at various points along the corridor. Land that was previously available for recreation will now be compromised. A replacement of this useable space and experience must be part of the mitigated package. For instance, the images below compare the quality of green space on the WSDOT peninsula before and after the creation of proposed ramps and the changes that will result under SR 520 (mainline) to maintain connection from the Arboretum and the Marsh Island.



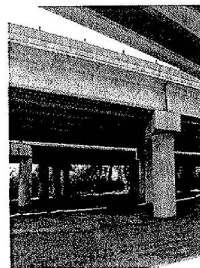
Current conditions WSDOT peninsula



Proposed conditions WSDOT peninsula (artist interpretation)



Current Tunnel ~72 feet



Proposed crossing (artist interpretation)

Response:

See Section 10.2 of the 2006 Draft EIS Comment Response Report.

C-030-010

Comment Summary:

Arboretum (Concerns)

Response:

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

C-030-011

While Seattle Audubon has not chosen a preferred alternative we are steadfast in our decision to **oppose** the Pacific Street Interchange Alternative. We feel the impacts created by the Pacific Street Interchange on the environmental quality of the Foster / Marsh Island wetland complex will be **significant** and more importantly **avoidable** by choosing another option. The Pacific Street Interchange Alternative on the surface may be beneficial to traffic impacts to the Montlake neighborhood, but Seattle Audubon does not believe these benefits outweigh the environmental and experiential impacts that will be forced upon citizens of Washington and specifically visitors to the Foster / Marsh Island wetland complex. In addition, we do not see enough evidence that the traffic impacts will actually be minimized. How unfortunate would it be if we chose an alternative that severely impacted the Foster / Marsh Island wetland complex **and** did not solve neighborhood impacts either?

Marsh Island, one of the last remaining forested wetlands in our region, would take the brunt of the impacts created by the Pacific Street Interchange. The Pacific Street Interchange would place at least four columns directly on Marsh Island. It would also require the removal of a large portion of the existing vegetation and prevent trees and other vegetation from reaching maturity, due to shading and direct conflicts. The walking trails on the island would have to be removed or be altered to ensure a safe passage under the roadway. The massive infrastructure over the island will dramatically alter the habitat, most likely completely displacing the current populations of birds and other wildlife. The DEIS does not adequately address impacts resulting from the Pacific Street Interchange.



What grows under an overpass and what will Marsh Island look like with one of these bisecting it?

C-030-011

Comment Summary:

Pacific Street Interchange Option

Response:

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

C-030-012

Environmental Impacts

The area around the Arboretum, Foster / Marsh Islands, and the Montlake Natural Area are rich in bird diversity. In the fall and winter you may see hundreds of American Coots floating in the wetlands or catch a glimpse of a solitary American Bittern. The area supports huge congregations of waterfowl as well as smaller groupings of birds and solitary residents. All of this adds up to an extremely diverse complex of habitats. There is no doubt these habitats will be impacted by the SR 520 bridge replacement. However, the DEIS needs to better address how each alternative will impact habitat in the area and what specific mitigation measures would be needed under each alternative. The impacts of the 6-lane, 4-lane and Pacific Street Interchange alternative would have dramatically different impacts on birds and wildlife, but the DEIS only looks at direct wetland filling or vegetation loss. How can an informed decision on a preferred alternative be made without a complete understanding of the environmental impacts of each?

- How will a bridge deck that bisects Marsh Island and shades part of the island impact habitat?
- Vegetation is much more than re-planting. What areas cannot be replanted because of bridge deck shading? How much habitat is lost because it will be under bridge decks?

Chapter two of the DEIS introduces the birds and other wildlife that frequent the area in and around the SR 520 bridge project. The text highlights Bald Eagles and salmon because of their endangered status. The text also identifies Kingfishers, Great Blue Heron and several other species of birds that are important to our region and use the area. However, the DEIS does not address what impacts might occur to these species, nor does it provide a direct comparison of any of the alternatives as to their potential impacts to birds or other wildlife. This presents a major problem in our view.

Over the last two years Seattle Audubon has conducted a study on the nesting and foraging habitat of the Great Blue Heron. We have conducted this study in partnership with the Cascade Land Conservancy and CommEn Space to identify the remaining critical habitat of this unique and charismatic bird. Attached is a map of the results of King County and a magnified view of Seattle. As identified on the map there are very few areas of critical habitat for the Great Blue Heron left in Seattle. Two of the most contiguous areas of critical habitat include Foster Island and the area near Discovery Park. SR 520 will potentially impact the Great Blue Heron in significant ways, yet the DEIS does not adequately address this issue. How much foraging area will be lost due to the new SR 520 configuration? What is the likely outcome if the Great Blue Heron is displaced from the Foster Island foraging area?

C-030-012

Comment Summary:

Wildlife Effects

Response:

See Section 16.2 of the 2006 Draft EIS Comment Response Report.

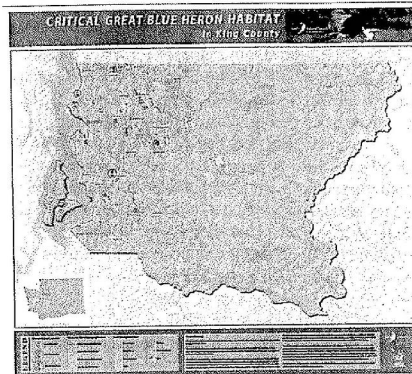
C-030-013

Comment Summary:

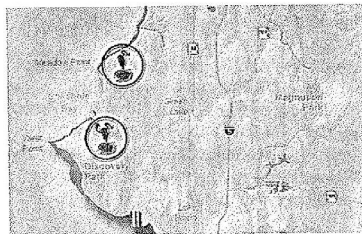
Wildlife Effects

Response:

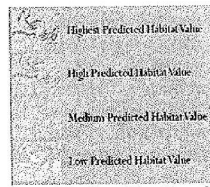
See Section 16.2 of the 2006 Draft EIS Comment Response Report.



Seattle Audubon's Critical Heron Habitat Map for King County



Enlargement of Seattle Area Critical GBH Habitat



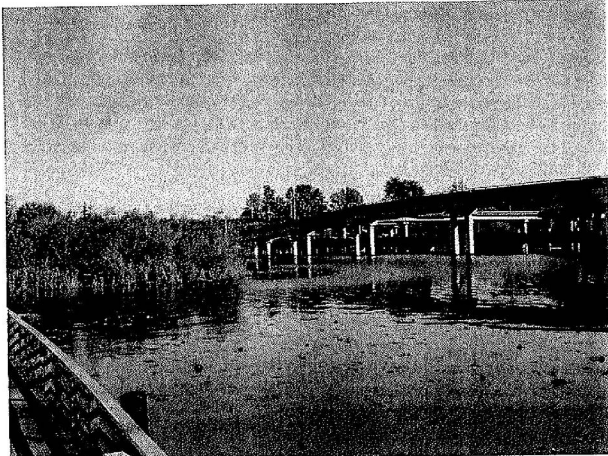
Legend for Great Blue Heron Maps

C-030-013

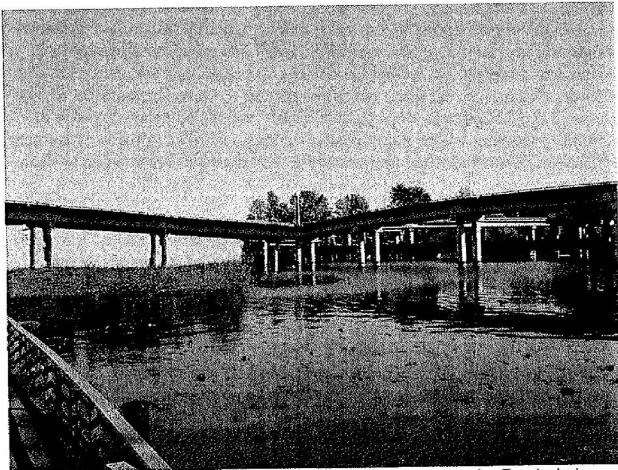
The DEIS focuses on a very narrow definition of environmental impacts. The main discussion admits that the project (any alternative) will fill wetlands and remove vegetation. It is however, quick to point out that filling of wetlands will be kept to a minimum and vegetation will be replanted. This simplistic discussion misses the importance of discussing and understanding habitat, habitat relationships, fragmentation, barriers and other factors that disrupt wildlife life-cycles and the ecological function of the Foster / Marsh Island wetland complex. The questions we need to ask regarding environmental impacts are:

- What wildlife will be displaced, permanently or temporary?
- What changes in habitat will result from vegetation removal?
- How will the increase in road width and infrastructure impact habitat?

We need to ask these questions because the Foster / Marsh Island wetland complex is rich in species diversity and provides unique niche habitat in our urban environment.



Current Conditions: Marsh Island Looking East



Proposed Conditions: Marsh Island with Pacific Street Interchange: Looking East (artist interpretation)

Other Environmental Impacts (Stormwater and Shading)

C-030-014

The functional details of the stormwater treatment are not sufficient enough to make an informed criticism of the alternatives. No scientific literature is referenced and there is no objective discussion of the performance or design details of the stormwater treatment basins. The unique stormwater treatment basins are small intricate systems at the base of columns. How will the plant material be kept alive, especially in the winter months when the most need for mitigation will occur?

C-030-015

WSDOT has also referred repeatedly that because the bridge deck will be higher there will be less impacts as a result of shading. Once again no scientific literature is referenced and no quantifiable evidence is provided. The bridge decks will be higher, but they will also be much wider. What are the shading impacts of a wider deck? How many acres of wetlands and land in general will be covered by new bridge decking? How much of this impact is in addition to the current conditions?

C-030-016

Another critical issue that will dramatically impact the success or failure of environmental mitigation is the commitment of WSDOT in seeing these mitigation elements through to completion. On page 5-6 of the DEIS WSDOT states that "the stormwater treatment wetland could be a positive feature to viewers." It illustrates a constructed wetland of high natural diversity. Indeed this type of wetland would be an asset, but there are numerous studies that point to the need for a long-term monetary and time commitment to ensure wetland creation is successful. It would be just as easy to end up with a stormwater treatment pond of low value that degrades the viewer's experience. Seattle Audubon has learned tough lessons over the years that promised mitigation and aesthetic additions to a project are also the first to receive budget cuts and general design cut-backs. Seattle Audubon is cautiously optimistic that the stormwater treatment will be a positive element, especially given word choice "could" and the monetary expense of this project. What guarantees will be put in place to ensure not only stormwater treatment ponds but all aspects of aesthetics and mitigation are designed and implemented to their fullest?

C-030-017

Cultural and Visual Impacts

The SR 520 bridge project at the very least will create a wider roadway and considerably more concrete and infrastructure. How will the alternatives impact the experience of canoeists and other recreationalist who utilize the Foster Marsh Island wetland complex? How much of their canoeing experience will be under bridge decks and other infrastructure? How many visitors rent canoes and kayaks each year from the University of Washington Aquatics Center and surrounding outfitters? What will be the experience of visitors to the University of Washington Aquatics Center if the Pacific Street Interchange is selected verses the other alternatives? The quality of the visitor's experience to the Arboretum and Foster / Marsh Island wetland complex has not been considered. This area is a highly used and important recreational area for students, families and the general population of Seattle and the region. This area is also part of the original Olmsted Plan, a historic feature of Seattle. An alternative that solves the needs of moving people must be balanced with preserving the quality of the environment and the

C-030-014

Comment Summary:

Pier Treatment Wetlands

Response:

See Section 15.0 of the 2006 Draft EIS Comment Response Report.

C-030-015

Comment Summary:

Wetland Shading Effects

Response:

See Section 16.1 of the 2006 Draft EIS Comment Response Report.

C-030-016

Comment Summary:

Wetland Mitigation

Response:

See Section 16.1 of the 2006 Draft EIS Comment Response Report.

C-030-017

Comment Summary:

Section 106 Process

Response:

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

C-030-017

quality of the experience of the Foster / Marsh Island wetland complex. Seattle Audubon does not feel the DEIS has achieved this purpose. We are therefore reiterating our request that a full Section 106 be conducted to review and document the effects of the SR 520 Project on Washington Park and Arboretum, Lake Washington Boulevard, University of Washington Campus and the Foster / Marsh Island recreation area, all significant Olmsted cultural landscapes, which are all eligible for National Register of Historic Places and are adversely impacted by all proposed 520 alternatives. Seattle Audubon also requests to be included as a consulting party to the Section 106 review and any related Memorandum or Programmatic Agreement.

Summary

The four main points of Seattle Audubon's comments are:

C-030-018

1. To ensure that an adequate mitigation package is formed as part of the SR 520 bridge project that addresses long-term monetary and maintenance commitments.
2. Further research and investigation is needed on the performance of the new stormwater basins, habitat impacts to the Great Blue Heron and habitat loss as a result of shading.
3. Seattle Audubon strongly opposes the Pacific Street Interchange. This alternative will dramatically and severely impact Marsh Island and the entire Foster / Marsh Island wetland complex.
4. A Section 106 should be conducted on all historically significant areas and a more detailed documentation of the visitor's **experience** of these areas should be studied. Mitigation for the SR 520 project has to go beyond the 3:1 wetland replacement and examine the quality of life impacts to the thousands of visitors to the Arboretum, University of Washington Aquatics Center and the general areas around Foster and Marsh Islands.

C-030-019

C-030-020

C-030-021

Thank you for the opportunity to comment.

Sincerely,



Matthew Mega, MICP
Urban Habitat Director

CC: Governor Chris Gregoire, Mayor Greg Nickels and Seattle City Councilmembers

C-030-018

Comment Summary:

Wetland Mitigation

Response:

See Section 16.1 of the 2006 Draft EIS Comment Response Report.

C-030-019

Comment Summary:

Wildlife Effects

Response:

See Section 16.2 of the 2006 Draft EIS Comment Response Report.

C-030-020

Comment Summary:

Pacific Street Interchange Option

Response:

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

C-030-021

Comment Summary:

Section 106 Process

Response:

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