



Friends of Seattle's Olmsted Parks
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Washington State Dept of Transportation
SR 520 Project Team
Jenifer Young
SDEIS Environmental Manager
600 Stewart St., Suite 520
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April 15, 2010

Re: Comments to SR 520 SDEIS

C-024-001

- Jim Gail
- Joan Hockaday
- Karen Janosky
- Ray Larson
- Kathy Mendelson
- Jennifer Ott
- Larry Sinnott
- Kathleen Conner
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Dear WSDOT Planners,
The Friends of Seattle's Olmsted Parks (FSOP) are guardians of the historic Olmsted Brothers designed Park and Boulevard System here in Seattle. We are a citizen advisory board to the Seattle Parks and Recreation Dept on issues related to the Olmsted Brothers designed Park and Boulevard System. FSOP is one of the largest local affiliates of the National Association of Olmsted Parks. Our Board is very concerned about your under-recognition, mis-representation and misleading portrayal of Lake Washington Boulevard in this SDEIS.¹

Lake Washington Boulevard (LWB) is Seattle Parks property, not a City street, and should not be an extended freeway on-ramp. It was laid out in 1903 by John Charles Olmsted on his very first trip to Seattle, design by the Olmsted Brothers firm and construction began in 1904 well before the Montlake Neighborhood was platted (1909), and long before the Washington Park Arboretum was designed (1934). You have chosen not to include it as a potential individual historic property, even after much insistence and documentation from this Board and our representatives. We have been told that the Section 106 reviewers at first "lumped" it in with the WP Arboretum, but in the end they "lumped" it in with the potential Montlake Historic District, neither of which is appropriate. We request that Lake Washington Boulevard from Montlake to Madison be acknowledged as its own separate historic park resource apart from either the Arboretum or Montlake. It is part of a larger city-wide boulevard system that has historic significance all on its own. (See our October 31, 2006 letter to Paul Krueger in response to the DEIS at that time.)

C-024-001

The Final EIS acknowledges Lake Washington Boulevard as a designated park boulevard, and all discipline report amendments properly refer to Lake Washington Boulevard as a park boulevard. Since the SDEIS was published, WSDOT has performed additional analysis of Lake Washington Boulevard and has prepared a determination of eligibility for the boulevard, based on an in-depth analysis and review, recommending Lake Washington Boulevard from Madison Street to Northeast Pacific Street as individually eligible for listing in the National Register of Historic Places. The boulevard is also recommended as a contributing element to both the Washington Park Arboretum and the Montlake Historic District. The Washington State Department of Archaeology and Historic Preservation (DAHP) concurred with this eligibility determination in August 2010.

Lake Washington Boulevard will not be used as an extended freeway ramp. Westbound SR 520 traffic will access the boulevard via a new intersection located on the Montlake lid at 24th Avenue East. The Preferred Alternative reduces impacts on the park boulevard through a number of design elements, which are described in Chapter 2 of the Final EIS.

The Preferred Alternative reduces trip volumes on Lake Washington Boulevard in the Arboretum compared to the No Build Alternative. Under the Preferred Alternative in 2030, a.m. peak hour volumes on Lake Washington Boulevard through the Arboretum would be 1,330 vehicles per hour, compared to 1,950 vehicles per hour with the No Build Alternative. P.m. peak hour volumes would be 1,410 vehicles per hour compared to 1,730 with the No Build Alternative. More specific traffic volume forecasts for Lake Washington Boulevard under the Preferred Alternative are in the Final Transportation Discipline Report (Attachment 7 to the Final EIS).

C-024-001 This lack of acknowledgement of Lake Washington Boulevard as a significant Park resource is all the more disturbing because traffic volumes on LWB vary widely between these options and sub-options, as your numbers from Attachment 7 Transportation Exhibit 6-1 and 6-2 show:

	<u>AM</u>	<u>%</u>	<u>PM</u>	<u>%</u>
Option A	900	100	1200	100
Subopt A	1900	211	1800	150
Option K	2000	222	2100	175
Option L	2000	222	2100	175

Increasing traffic by half or more than double is a very significant impact and should be identified! ² That increased traffic does in fact diminish the character of the entire boulevard, and consequently the entire Park and Boulevard System of this city for residents and visitors, when it is over-run by freeway traffic. LWB is the essential connecting spine of the Park and Boulevard design. Your catalog of affected properties does not recognize this diminished character when LWB is aggregated with either Montlake or the Arboretum. Even your maps mis-label the boulevard section from the curve near E Calhoun St to the curve near E Roanoke St as 26th Av E, which is not correct! ³ We hope you will undertake better research before deliberations and presentations for the Preferred Alignment choice and the Final EIS.

C-024-002 FSOP is also concerned about your minimal evaluation of the eastbound bus/HOV on-ramp in Suboption A (A+). ⁴ The southbound Montlake Blvd queuing lane for this on-ramp will encroach on, if not actually carve up, the Montlake Blvd medians, which are also Park Dept property and date from the 1909 AYP Exhibition. This SDEIS has no diagram or plan of sufficient scale to show how this bus/HOV queuing lane, combined with the existing southbound Montlake Blvd 520 queuing lanes, combined with some provision for through traffic, could actually work without over-running the historic Park Dept medians. Your sketchy evaluation also under-represents the additional width in wetland and over water area for tapering-in this bus/HOV lane into the mainline of 520 all the way out to Foster Island. ⁵

C-024-003 FSOP is also very concerned about your evaluations of the Montlake/McCurdy lid in Option A and Suboption A (A+). You laud the benefits of reconnecting neighborhoods with pedestrian and bicycle paths and you cite the Health Impact Study that supports those ideas, but the lid design in Suboption A has a full-time freeway off-ramp running diagonally across it and an on-ramp dominating one corner. Both of these ramps attract significant volumes of traffic to the boulevard bordering the south edge of this lid. How is such a traffic-dominated landscape the least bit pedestrian friendly or any kind of reconnection for a neighborhood divided by the original highway construction? These LWB ramps of Suboption A also add width to the mainline of 520 for ramp tapering, which means more wetland and over water area taken. You do say that Option A has the better trails and bike paths, but you don't say that Suboption A entirely eliminates those same connecting trails and bike paths. ⁶ We believe you are too quick to say there are no additional effects due to the suboptions.

C-024-004 You have incorporated some of the changes from the recent 520 Legislative Workgroup sessions, but the major and significant differences between the SDEIS Option A and SDEIS Suboption A (A+) should have been in here already and should have had a better airing. Traffic volume differences on LWB in the Arboretum, the negative physical impacts of the eastbound

SDEIS exhibits that labeled various portions of Lake Washington Boulevard were accurate. According to the King County Assessor, Lake Washington Boulevard from where it exits the Arboretum to its intersection with East Roanoke Street is formally designated 26th Avenue East.

C-024-002

After the SDEIS was published, the Engrossed Substitute Senate Bill (ESSB) 6392 Workgroup was commissioned to provide regional entities with an opportunity to refine components of the project, including design refinements, transit connections, and the plan for the Montlake Interchange. The participants, including technical staff from the Seattle Office of the Mayor, the Seattle City Council, WSDOT, King County Metro, Sound Transit, and the University of Washington, have further evaluated and refined the design for the Montlake Interchange and for the on-ramps at Montlake Boulevard.

The Preferred Alternative would remove one Montlake Boulevard median between East Hamlin Street and SR 520 and replace it with a context-sensitive median. WSDOT would mitigate the removal of the Parks Department median with the measures specified in the Programmatic Agreement (Attachment 9 to the Final EIS).

The Preferred Alternative also modifies the Option A footprint through the Arboretum and over Foster Island to reduce potential effects while continuing to satisfy the project purpose and need. WSDOT worked to reduce the footprint of the project and the impact on wetlands wherever possible while accommodating potential future light rail in the corridor. Due to design accommodations for potential future light rail, the Preferred Alternative would shade a larger area of Union Bay wetlands than would Option A. With the Preferred Alternative, the total area of right-of-way required in the Arboretum would be less than under the SDEIS design options. Appropriate mitigation will be provided. See the

C-024-004 bus/HOV on-ramp, and the non-functional neighborhood connecting lids, should all get a better explanation in your last presentations and discussions before the Preferred Alignment is identified.

Sincerely,



Larry Sinnott, AIA
FSOP Boardmember and Representative to SR 520 Mediation



Brooks Kolb
President, Friends of Seattle's Olmsted Parks

Footnotes

- 1) 4-32, 5-46, 5-90, 5-96, Att.6 4f/6f p 29, 37, 43, 48, 59, 60,
- 2) 4-32, 5-39, 5-46, 5-61, Att.6 4f/6f Exh 52,
- 3) Exh. 4.6-1, Exh 5.6-3, and all other maps, Att.6 4f/6f p 49, 81,
- 4) 5-21, 5-24,
- 5) 5-39, 5-61, 5-78, 5-90, 5-97, 5-136, Att.6 4f/6f p 81,
- 6) 5-28, 5-42, 5-44, 5-46, 5-53, 5-59, 5-63, 5-90, Att. 7 Transp. 8-32,

Ecosystems Discipline Report Addendum (Attachment 7 to the Final EIS) for discussion of effects on wetlands and how they will be mitigated.

C-024-003

The Montlake lid is intended to function as a vehicle and pedestrian crossing, a landscaped area, and open space. The lid design includes multiple traffic management and traffic calming strategies, along with a number of bicycle and pedestrian routes. Design and treatment for the lid were developed through the ESSB 6392 workgroup process and further coordination with the City of Seattle and surrounding communities. Design refinements from the ESSB 6392 Workgroup have been incorporated into the Montlake Interchange design and are discussed in the Final EIS.

The Lake Washington Boulevard ramps have been removed from the design for the Montlake Interchange. The elimination of these ramps reduces the footprint of the SR 520 mainline in the Montlake area. As a result of design refinements and recommendations from the ESSB 6392 Workgroup, traffic volumes on Lake Washington Boulevard under the Preferred Alternative would be notably less than those under the No Build Alternative.

C-024-004

Since the SDEIS was published, WSDOT has identified a Preferred Alternative which is evaluated in the Final EIS and in the final discipline reports and discipline report addenda. The Preferred Alternative is similar to Option A, but includes design refinements that would improve mobility and safety while reducing adverse effects more fully than would Option A or Option A with suboptions.

In addition to design refinements, transit connections, and the plan for the Montlake Interchange, the ESSB 6392 Workgroup focused on ways to improve the configuration of the SR 520 on-ramps and neighborhood

lids. WSDOT has incorporated these recommended features in the Preferred Alternative. Additionally, WSDOT is actively coordinating with the Arboretum and Botanical Garden Committee and City of Seattle to create a traffic management plan for the Arboretum, emphasizing the portion of Lake Washington Boulevard passing through the Arboretum and including traffic calming measures and traffic management options.