

From: Brooks, Sandy [mailto:Sandy.Brooks@seattle.gov]
Sent: Wednesday, April 14, 2010 4:23 PM
To: Young, Jenifer (Consultant)
Cc: Hahn, Peter; Brown, Stephanie; McGinn, Mike; Conlin, Richard; Bagshaw, Sally; O'Brien, Mike; Licata, Nick; Godden, Jean; Rasmussen, Tom; Clark, Sally; Harrell, Bruce; Burgess, Tim; Gallagher, Timothy; pres@uw.edu
Subject: ABGC Comments on SR 520 I-5 to Medina: Bridge Replacement and HOV Project SDEIS

Hello Ms. Young,

Attached you'll find comments on the SR 520 I-5 to Medina: Bridge Replacement and HOV Project SDEIS from the Arboretum and Botanical Garden Committee (ABGC), which is charged with oversight of the Washington Park Arboretum.

Please acknowledge receipt of these comments and let me know if you have any questions.

Thank you.

Sandy Brooks
ABGC/Park Board Coordinator
(206) 684-5066
www.seattle.gov/parks/parkboard
"Creating community through people, parks and programs."
www.seattle.gov/parks

*** eSafe2 scanned this email for malicious content ***
*** IMPORTANT: Do not open attachments from unrecognized senders ***

Arboretum and Botanical Garden Committee (ABGC)

Members

Jack Collins, City of Seattle Mayoral appointee
Theresa Doherty, University of Washington
Tim Gallagher, City of Seattle, ABGC Secretary
Sandra Lier, University of Washington, ABGC Vice-chair
Kjris Lund, City of Seattle Mayoral appointee
Paige Miller, Arboretum Foundation
Iain Robertson, University of Washington
Dave Towne, Washington State Governor's appointee
Barbara Wright, Arboretum Foundation, ABGC Chair

April 14, 2010

Jennifer Young, Environmental Manager
SR 520 Project Office
600 Stewart Street, Suite 520
Seattle, WA 98101

RE: The Arboretum and Botanical Garden Committee's Comments to the
SR520, I-5 to Medina: Bridge Replacement and HOV Project Supplemental
Draft Environmental Impact Statement (SDEIS)

Dear Ms. Young,

The Arboretum and Botanical Garden Committee (ABGC) respectfully submits the following comments as its official response to the SR520, I-5 to Medina: Bridge Replacement and HOV Project SDEIS. Please add these comments to the official record.

Background

The Arboretum and Botanical Garden Committee (ABGC) is comprised of representatives from the City of Seattle, both City staff and citizen representatives, the University of Washington, the Arboretum Foundation, and a representative designated by the Governor for the State of Washington. The ABGC advises the University of Washington, City of Seattle and The Arboretum Foundation on the management and stewardship of the Washington Park Arboretum (hereafter Arboretum) for the benefit of current and future generations.

The Arboretum is a stunning gem of the Seattle Park system, a 230-acre oasis of gently rolling land, bucolic watery islets, and home to the best of the city's wildlife. It provides respite, scenery, recreation, and solace to thousands of visitors in every season of the year. It provides educational and volunteering opportunities to thousands of friends, sightseeing to thousands of visitors, and cultural enrichment in gardening styles and distant ecosystems to those who seek it out. Proposed upgrades to State Route 520 (SR 520) across the north end of the Arboretum threaten to significantly

C-032-001

Following the review of public and agency input on the SDEIS, WSDOT and FHWA have identified a Preferred Alternative. The Preferred Alternative is similar to Option A, but with a number of design refinements that are intended to minimize the effects on the environment that were presented in the SDEIS.

During the development of the Preferred Alternative, WSDOT and FHWA considered the Arboretum and Botanical Gardens Committee's six guiding principles. As a result of this and input from other stakeholders, the Preferred Alternative would minimize harm to the Washington Park Arboretum and to the environment in the overall project area. The analyses conducted for the Final EIS found that the Preferred Alternative would reduce overall negative effects on the Arboretum compared to the No Build Alternative and the other options that were presented in the SDEIS. Footprint in the Arboretum has been further refined, with right-of-way acquisition reduced compared to the SDEIS design options. Once completed, the Preferred Alternative is expected to improve air quality and water quality, reduce traffic volume on Lake Washington Boulevard, and reduce noise at many locations in the Arboretum.

During the 2010 legislative session, the Washington State Legislature passed and Governor Gregoire signed Engrossed Substitute Senate Bill (ESSB) 6392. Among other requirements, ESSB 6392 directed WSDOT to work with regional agencies to develop a mitigation plan for the Washington Park Arboretum. WSDOT began this coordination in May 2010, and it continued over a series of 11 meetings with representatives from ABGC and the Seattle Department of Transportation. Throughout these meetings, WSDOT and ABGC consulted the 2001 Arboretum Master Plan to determine which projects in the plan could be funded by WSDOT as mitigation measures.

The workgroup coordination culminated with publication of the

C-032-001

C-032-001

impact the park for many, many years due to construction, and will impose a base set of permanent adverse impacts once the bridge is completed.

In May 2001, the Seattle City Council, University of Washington Board of Regents, and the Arboretum Foundation Board of Directors approved the Washington Park Arboretum Master Plan, creating a road map for Arboretum improvements over the next 20 years. The Master Plan ensures the Arboretum will effectively fulfill three primary purposes—conservation, recreation, and education—for decades to come. Together, University of Washington Botanic Gardens, Seattle Parks and Recreation, and the Arboretum Foundation are working to implement the Master Plan. Substantial public and private funds have been used to begin implementation of the Master Plan and to improve the Washington State's official Arboretum and visitors' experience to the park. The first Pacific Connection Gardens have been created, the Japanese Garden Gatehouse has been built and the Gateway to Chile Garden is being installed this year. All of these contributions, and much more, will be negatively impacted by the proposed SR 520 expansion project. Complete funding for the implementation of the Master Plan must be considered by WSDOT as a mitigation option due to the significant adverse impacts to the Arboretum as a result of the project.

The Arboretum and Botanical Garden Committee would like to ensure a design for the SR 520 bridge replacement that minimizes harm to the Arboretum and therefore, has adopted Guiding Principles for the SR 520 expansion (see below). In a special February 4, 2010 meeting, the ABGC agreed that "less is better" in all aspects of the SR 520 corridor design. Specifically, less noise, less width, less height, less pollution, less car traffic, and less impact on Lake Washington Boulevard is better.

Guiding Principles

The proposed SR 520 project in and around the Arboretum should:

1. Enhance the Arboretum through the design, construction and operation of SR 520 and the SR 520 I-5 to Medina: Bridge Replacement and HOV Project;
2. Avoid harm to the Arboretum and its collections;
3. Respect the historical, aesthetic, and design integrity of the Park;
4. Fully compensate the Arboretum for loss of property and function if harm is unavoidable;
5. Reduce traffic on Lake Washington Boulevard below levels that exist today on the boulevard between Montlake Boulevard and East Madison Street; and,
6. Preserve and restore the Arboretum as an accessible place of quiet and respite.

Given these guiding principles, the ABGC respectfully submits the following comments in response to the Supplemental Draft Environmental Impact Statement (SDEIS) issued on January 22, 2010:

C-032-002

The Arboretum is a long narrow park located along the bottom and west side of a narrow, north-south running valley drained by a stream that enters Lake Washington at Union Bay close to the current SR 520 off ramps. Lake Washington Boulevard, a historic park boulevard with a 25 mph speed limit, is part of the Olmsted-designed boulevard system for the city and runs along the bottom of the valley for the entire length of the Arboretum. The boulevard was intended to be an integral part of the park experience but traffic that uses the boulevard as an extended on and off ramp for SR 520 results in it having the opposite effect, a negative impact that pervades the Arboretum and park. The majority of traffic entering and leaving SR 520 via Lake Washington Boulevard travels the entire length of the boulevard through the heart of the arboretum. Egress and access to Lake Washington Boulevard from Boyer Street is very difficult. Thus almost all traffic using the park boulevard, 18,000 vehicles per day on average, travels the entire length of Lake Washington Boulevard from Madison Street at the park's south end to SR 520 near its northern end. The shape of the valley concentrates rather than disperses noise and air pollution in Washington Park. Lake Washington Boulevard forms

ABGC Response to SR 520 SDEIS
Page 2

Arboretum Mitigation Plan (Attachment 9 to the Final EIS), which contains the specific mitigation measures agreed to by all parties. A number of these mitigation measures were derived from the Arboretum Master Plan, and the remaining measures were supported by ABGC because they would reduce the project's effects on the Arboretum. Some of these measures would be implemented by WSDOT in conjunction with project construction, and others would be funded by WSDOT and implemented by the City of Seattle or the University of Washington. WSDOT would not provide funding for the complete implementation of the Arboretum Master Plan, because not all of the elements in the plan would meet regulatory requirements as mitigation for the project's effects.

Along with mitigation measures to address project-specific effects on the Arboretum, the workgroup recommended design modifications to minimize effects from the transportation facility and worked to support the Seattle Department of Transportation's development of traffic calming measures and improved traffic management for the Arboretum. Please see Chapter 1 of the Final EIS for a summary of workgroup outcomes.

The SR 520, I-5 to Medina project would not have negative effects on the Pacific Connection Gardens, the Japanese Garden Gatehouse, or the Gateway to Chile Garden. Because the Preferred Alternative would reduce trip volumes on Lake Washington Boulevard compared to the No Build Alternative, the project would benefit this area of the Arboretum rather than causing adverse effects.

C-032-002

Through a number of design refinements, the Preferred Alternative would have fewer and less severe effects on Lake Washington Boulevard and the Arboretum than the No Build Alternative. The Preferred Alternative would remove the existing Lake Washington

- C-032-002 | the eastern boundary of the internationally recognized and historic Japanese Garden. A solid timber fence along this boundary minimally reduces, but does not eliminate, traffic noise in the garden rendering a garden intended for quiet contemplative strolling disturbed by constant traffic noise.
- C-032-003 | • Adverse impacts that the Arboretum has suffered for nearly 50 years as a result of traffic on SR 520 and Lake Washington Boulevard should not be taken as the base condition from which to assess impacts of new development. The ABGC requests that the Arboretum's physical nature, educational values, and visitor experience be enhanced by the construction of the SR 520 Bridge Replacement project.
- C-032-004 | ○ Avoiding the adverse impacts of the bridge on the Arboretum is critical. WSDOT's engineer's and roadway designers must recognize that the Arboretum is not just another City park, but the State's only recognized arboretum that contains valuable, irreplaceable specimen plantings whose lifecycles have been carefully documented through years of curation. If the current environmental laws were in place in the 1960's when SR 520 was built, the roadway would not cut across the Arboretum's precious wetlands and the ramps would not have connected to Lake Washington Boulevard. To the extent that adverse impacts cannot be avoided, these impacts should be minimized as much as possible.
- C-032-005 | ○ The construction footprint and impact areas within the Arboretum must be clearly delineated and reviewed by the ABGC.
- C-032-006 | ○ The direct effect of converting Arboretum parkland adjacent to the SR 520 corridor to transportation right-of-way must be fully mitigated.
- C-032-007 | ○ Design, construction, and impacts of the new SR 520 Bridge should address the potential for increased noise through the Arboretum. The project must be designed and constructed such that noise levels are below the levels experienced today.
- C-032-008 | ○ Continued and potentially increased noise pollution due to the SR 520 expanded roadway must be addressed and mitigated within the new design. State of the art noise reduction measures should be included in the final design, e.g. quieter pavement. Further modeling analyses are needed in order to understand the effect of noise walls across Foster Island and the trade-off between the impacts of visual blight (with noise walls present) and noise pollution (without noise walls).
- C-032-009 | ○ Visual impacts of the SR 520 Bridge structure should not detract from the Arboretum. Designing a "signature" bridge does not reduce the visual impact of a concrete and/or steel structure in the heart of the Arboretum.
- C-032-010 | ○ Public use and access of the Arboretum needs to be maintained during construction. Access includes pedestrian and bicycle connections from the Arboretum, over SR 520 and the Montlake lid and around the campus to Union Bay and Center for Urban Horticulture. Trails and bicycle routes must be kept open as much as safely possible and if closed will be temporarily routed around construction sites to minimize trail closures.
- C-032-011 | ○ Foster Island is considered an eligible Traditional Cultural Property (TCP). Bridge alignment position and width must be fine tuned so that the SR 520 Bridge crosses between the two historic islands in an effort to minimize any adverse effects to Foster Island.
- C-032-012 | ○ Complete funding for the implementation of the Master Plan must be considered as a mitigation option due to the significant adverse impacts of the SR 520 expansion to the Arboretum.

Boulevard eastbound on-ramp and westbound off-ramp and the R.H. Thomson Expressway ramps. As a result of these ramp removals and other design features, in 2030, trip volumes on Lake Washington Boulevard through the Arboretum would be reduced 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.

As part of the Arboretum Mitigation Plan, WSDOT has committed to working with the Seattle Department of Transportation to fund traffic-calming measures along Lake Washington Boulevard and to identify additional traffic management measures in the Arboretum.

The combination of reduced traffic volume, traffic-calming measures, and noise reduction strategies included in the Preferred Alternative would improve air quality and reduce noise in the Arboretum compared to the No Build Alternative and all options that were evaluated in the SDEIS.

C-032-003

WSDOT has evaluated potential effects on the Arboretum and other environmental resources in the project area in accordance with NEPA and SEPA guidelines. Both sets of guidelines require that potential project effects should be evaluated by comparison with existing conditions, which provide a baseline for the evaluation.

Using information obtained in the NEPA and ESSB 6392 workgroup processes, WSDOT has refined the design of the Preferred Alternative to avoid and minimize a number of project effects on the Arboretum. The remaining effects will be mitigated through measures outlined in the Arboretum Mitigation Plan (Attachment 9 to the Final EIS).

- C-032-013 | • All attempts must be made to avoid harm to the Arboretum and its collections; any adverse impacts to the Arboretum, both during construction and through the long-term operation of the SR 520 facility as it passes through the Arboretum, must be avoided.
- C-032-014 | ○ Keep the project within existing WSDOT right-of-way and minimize any land acquisitions and encroachment into the Arboretum.
- C-032-015 | ○ The height and width of the structure across Foster Island must minimize the visual and noise impacts of the highway structure and maximize the benefits to public access and ecological function across Foster Island.
- C-032-016 | ○ Return any recreation facilities used during construction to preconstruction conditions.
- C-032-017 | ○ Take every precaution to ensure that the Arboretum's plant collections are protected from excessive shading, vibrations, excavations, and damage from heavy equipment and construction.
- C-032-018 | ○ Protect the plant collections within the Arboretum from the long-term impacts of the toxic pollution from the cars travelling on SR 520 across Foster Island and on Lake Washington Boulevard.
- C-032-019 | ○ Monitor and ensure compliance with local noise regulations for construction and equipment operation; noise levels must be regularly monitored and compliance ensured throughout the Arboretum.
- C-032-020 | ○ Enhance and restore riverine wetland in order to improve wildlife habitat and water quality conditions at the Arboretum. An example of such enhancement would include the daylighting and restoration of Arboretum Creek and augmenting its stream flow to encourage the return of fish runs. This type of mitigation near the headwaters of Arboretum Creek is compatible with the Arboretum's Master Plan.
- C-032-021 | ○ Minimize removal of specimen trees in the Arboretum. If this is not possible, replant or replace trees, as instructed by the University of Washington Curation Committee, nearby. Otherwise, the University of Washington Curation Committee will direct where non-native trees should be replaced to enhance the collection.
- C-032-022 | ○ The planter strips located along Lake Washington Boulevard must be preserved.
- C-032-023 | ○ Install landscaping or landscaped buffers to compensate in those areas where buffer zones are being removed or reduced, and where new or relocated traffic lanes would intrude on the character of the Arboretum, most specifically Lake Washington Boulevard.
- C-032-024 | ○ Mitigation needs to maintain the water storage volume of the existing storm water facilities and expansion of seep areas on hill slopes.
- C-032-025 | • Traffic entering and leaving SR 520 using Lake Washington Boulevard significantly increases the number of cars traveling along the boulevard which makes the boulevard dangerous to cross and adversely affects access to large parts of the Arboretum. The ensuing traffic pollution, noise, and visual distraction also prevents the use of a significant percentage of the total Arboretum for its intended educational and conservation purposes as well as its intended recreational uses. The SR 520 highway is a transportation facility running through the heart of a natural area and arboretum. The Arboretum has been and will continue to be fractured by SR 520 not just through the physical structure but the noise, pollution, and visual intrusion it has created. These impacts destroy the positive physical nature, educational value, and visitor experience of the Arboretum. As mitigation for this damage, and future damage to the park, a percentage of the tolls collected on the main line of SR 520 should be dedicated to improvements in the Arboretum.

C-032-004

The Preferred Alternative has been designed to minimize the project footprint across Foster Island as much as possible. The Preferred Alternative includes a narrow footprint across Foster Island, with reduced right-of-way acquisition in the Arboretum compared to the SDEIS options. Because the new bridge would be higher than the existing one, the increased clearance over Foster Island would improve conditions for wetland vegetation east and west of the island.

C-032-005

During development of the Arboretum Mitigation Plan, ABGC reviewed the Preferred Alternative design, including the proposed limits of construction and temporary construction easement areas. The temporary easements will be restored and returned to existing conditions or better, when construction is complete.

C-032-006

WSDOT will mitigate the right-of-way acquisition in the Arboretum as described in the Arboretum Mitigation Plan (Attachment 9 to the Final EIS).

C-032-007

The Preferred Alternative would reduce traffic noise in the Arboretum, particularly in locations close to the highway. The noise-reducing effects of changes in the west approach profile, elimination of Lake Washington Boulevard ramps, and 4-foot concrete traffic barriers with noise-absorptive coating would result in fewer properties exceeding FHWA noise abatement criteria in this area compared to the No Build Alternative. For more information, please see Section 5.7 of the Final EIS and the Noise Discipline Report Addendum (Attachment 7 to the Final EIS).

- C-032-025 • Unavoidable impacts must be mitigated, both those of shorter duration during the construction phase and the long-term impacts of facilitating increased traffic through the Arboretum.
- C-032-026 • There should be no direct access to or from SR 520 and Lake Washington Boulevard. The SR 520 access ramps to and from Lake Washington Boulevard have encouraged and facilitated traffic through the Arboretum which resulted in turning a quiet park boulevard into a shortcut for thousand of cars to travel to and from SR 520. This increased traffic through the heart of the Arboretum cuts off the Japanese Garden from the rest of the Arboretum, reduces the air quality due to vehicle emissions, increases noise from traffic, and makes crossing Lake Washington Boulevard unsafe.
The ABGC wants to ensure that no SR 520 on or off ramps are put into the Arboretum and that Lake Washington Blvd is not used for freeway access and egress by attaching it to any SR 520 ramps. The removal of these ramps and the freeway access from the boulevard are essential to the University's use of the Arboretum as an outdoor classroom and to the integrity of the general public's experience in the park.
- C-032-027 ○ Because Lake Washington Boulevard has been used as an extension of the on/off ramps to SR 520 for the past 47 years, the Arboretum should be compensated by WSDOT for the use of Lake Washington Boulevard for that period of time.
- C-032-028 ○ When the original SR 520 was built, federal law did not yet prohibit the use of park land when a prudent or feasible alternative exists and thus the new highway was sited across the north end of the Arboretum. On and off ramps were constructed connecting Lake Washington Boulevard, a park facility, to SR 520; thus using this parkway as the extended on and off ramps to the freeway. With the enactment of Section 4(f), WSDOT must now analyze whether there is a feasible and prudent alternative to placing new ramp facilities in the Arboretum and avoid placing facilities in the park if such alternative exists.
- C-032-029 ○ Lake Washington Boulevard, a park facility, currently functions as extended on and off ramps for a substantial amount of the traffic going to and from SR 520 on the east side of Seattle. The result is a constructive taking of the park facility for state transportation purposes. WSDOT must analyze whether it can design the SR 520 ramp system to avoid using Lake Washington Boulevard as a ramp access and egress for SR 520 and choose an alternative that avoids such use if it is feasible and prudent to do so.
- C-032-030 ○ If direct access to and from SR 520 to Lake Washington Boulevard is unavoidable and remains a part of the future project, the Arboretum should be duly compensated for the use of the boulevard in the future.
- C-032-031 ○ The most recent data from the Seattle Department of Transportation indicates that Lake Washington Boulevard carries 16,100 vehicles.¹ The SDEIS indicates that the ramps to and from Lake Washington Boulevard to SR 520 carry 3,000 vehicles in the AM and PM peak hours. Given 3,000 vehicles during two hours, the total amount of traffic that uses Lake Washington Boulevard exclusively to access SR 520 could be as high as 10,000 vehicles per day. Taken together, these traffic numbers indicate that as much as 62% of the traffic which uses Lake Washington Boulevard is directly related to SR 520. While Lake Washington Boulevard is a park boulevard, it is available for City residents to use as they travel throughout the City. However, this direct use of the boulevard as an access ramp to and from SR 520 is a highway use for which the

¹ Average Annual Daily Traffic (AADWT) (5-day, 24-hour)
ABGC Response to SR 520 SDEIS
Page 5

C-032-008

Please see the response to Comment C-032-007. The noise analyses conducted for the SDEIS and the Final EIS determined that noise walls in the Arboretum would not satisfy WSDOT feasibility criteria. Therefore, with the Preferred Alternative, no noise walls are recommended for the Arboretum. Instead, reductions in traffic noise will be achieved through noise reduction strategies incorporated into the design of the project.

C-032-009

The Arboretum Mitigation Plan includes a commitment by WSDOT to involve the ABGC in design of the Foster Island crossing to ensure compatibility with the park setting. Community groups and stakeholders will be involved in project design development corridor-wide to ensure that designs will be context-sensitive and will minimize adverse visual effects from the new facilities.

C-032-010

Construction of the Preferred Alternative would require intermittent closures of the Arboretum Waterfront Trail where it crosses SR 520 on Foster Island. During these closures, which are expected to total fewer than 180 days throughout construction, trail users would still be able to access Foster Island from the Graham Visitor Center. However, through coordination with the ABGC, WSDOT will continue to develop ways to reduce these temporary effects from construction and to improve pedestrian and bicycle connections in the park after construction is complete.

C-032-011

The bridge crossing of Foster Island has been sited to take advantage of the historic gap between the north and south islands and avoids any further encroachment on the more sensitive south island. Bridge spans have been increased as much as possible to minimize column

C-032-031

boulevard was never intended. If WSDOT intends to continue to use Lake Washington Boulevard for a highway on and off ramp, then WSDOT must compensate the City annually in the range of \$1 - \$2.1 million, based on present value and an 8% rate of return, for the use of the property in a proportional share to the percentage of traffic which uses the boulevard to access SR 520.

C-032-032

- o If the SR 520 project includes direct access ramps to and from Lake Washington Boulevard to SR 520, additional tolls should be included on these ramps. Tolls should be used as a way of travel demand management to discourage people from using Lake Washington Boulevard to access SR 520. The revenue from these tolls should be dedicated to the Arboretum only. These mitigation funds would help mitigate the impacts of the increased noise, air emissions, and vehicular distraction on the physical nature, educational value, and visitor experience of the Arboretum.

C-032-033

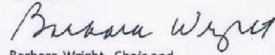
- o The increased use of Lake Washington Boulevard, as a result of its connection to SR 520 ramps, has cumulative adverse impacts on the educational and recreational use and quiet enjoyment of the Arboretum which can and should be mitigated through the removal of the ramp connections to Lake Washington Boulevard.

C-032-034

- o As mitigation for the current and potential future excessive traffic on Lake Washington Boulevard, traffic calming measures must be implemented on the boulevard.

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

Sincerely,



Barbara Wright, Chair and
Members of the Arboretum and Botanical Garden Committee

cc: Mike McGinn, Mayor, City of Seattle
The Honorable Richard Conlin, Chair, Seattle City Council
The Honorable Sally Bagshaw, Seattle City Council
The Honorable Mike O'Brien, Seattle City Council
The Honorable Nick Licata, Seattle City Council
The Honorable Jean Godden, Seattle City Council
The Honorable Tom Rasmussen, Seattle City Council
The Honorable Sally Clark, Seattle City Council
The Honorable Bruce Harrell, Seattle City Council
The Honorable Tim Burgess, Seattle City Council
Mark Emmert, President, University of Washington
Tim Gallagher, Superintendent, Seattle Parks
Peter Hahn, Director, Seattle Department of Transportation
Stephanie Brown, Seattle Department of Transportation

excavation. The areas that would be excavated for temporary and permanent bridge columns have undergone archaeological investigations, with no cultural resources found. As previously mentioned, the Preferred Alternative would require less right-of-way on Foster Island than the SDEIS options. WSDOT continues to coordinate with the affected Indian tribes under Section 106 of the National Historic Preservation Act to reduce effects on this traditional cultural property and to develop appropriate mitigation for the project's adverse effect.

C-032-012

Please see the response to Comment C-032-001, which states that WSDOT would fund a number of projects identified in the Arboretum Master Plan, through the Arboretum Mitigation Plan, but would not fund the Arboretum Master Plan in its entirety because not all of the elements in the plan would meet regulatory requirements as mitigation for the project's effects.

C-032-013

As discussed previously, the Preferred Alternative would reduce effects on the Arboretum compared to the No Build Alternative and all SDEIS options. For the remaining effects expected from construction and operation of the SR 520, I-5 to Medina project, WSDOT has worked with ABGC to identify appropriate mitigation measures. Specific mitigation measures for project effects are described in the Arboretum Mitigation Plan, which is included in Attachment 9 of the Final EIS.

C-032-014

As stated in the response to Comment C-032-003, the Preferred Alternative would require less land acquisition in the Arboretum than the SDEIS options. The acquisition is needed to safely accommodate the minimum bridge width required to meet the project purpose and need.

C-032-015

With the Preferred Alternative, the height of the bridge over Foster Island would increase, and clearance below the bridge would range from 14 to 20 feet as compared with about 8 feet today. The increased clearance would improve conditions for wetland vegetation and would improve user experience in this part of the park. The higher profile would also aid in reducing noise. WSDOT is working in partnership with interested Indian tribes and the ABGC to develop an appropriate re-vegetation plan for the area under the bridge span, which could enhance the visual environment for recreational users.

C-032-016

In keeping with WSDOT policy, all areas disturbed during construction will be restored to preconstruction conditions or better.

C-032-017

WSDOT would take all due care during construction to keep clearing to a minimum and protect areas adjacent to construction from disturbance. Any collection specimens damaged or removed during construction would be replanted or replaced in coordination with the University of Washington Curation Committee.

C-032-018

As stated in the SDEIS, the Final EIS, and the Air Quality Discipline Report and Addendum (Attachment 7 to the Final EIS), criteria pollutant emissions are expected to decrease from existing conditions by 2030. Traffic modeling for the Preferred Alternative shows that vehicle miles traveled in 2030 would decrease compared to the No Build Alternative, which would result in a slight decrease in both criteria pollutants and mobile source air toxics. Therefore, with the Preferred Alternative, air quality in the Arboretum is expected to be similar to, or slightly better than, the No Build Alternative. Consequently, the Arboretum plant

collections would not be subject to additional pollution with operation of the Preferred Alternative.

C-032-019

WSDOT will comply with all applicable regulations and ordinances governing noise. Acceptable construction noise levels inside the city limits are set by the City of Seattle and are in the Seattle Municipal Code, Chapter 25.08. WSDOT will comply with these requirements and those contained in Chapter 173-60 of the State of Washington Administrative Code. WSDOT will employ best management practices to limit construction noise and will monitor noise levels to ensure compliance with applicable regulations. WSDOT has also agreed to notify ABGC in advance about any potentially disruptive construction activities.

C-032-020

As discussed in the previous responses, WSDOT has worked with the ABGC through the ESSB 6392 workgroup process to identify mitigation measures for implementation in the Arboretum. Three of these measures address wetland restoration. For example, WSDOT has committed to restoring the natural appearance and ecological function of Arboretum Creek. This measure, along with the WSDOT peninsula restoration and improvements to Azalea Way Pond, will help improve the overall wildlife habitat and water quality in the Arboretum. Augmentation of the Arboretum Creek headwaters was considered as a mitigation measure, but was not included in the Arboretum Mitigation Plan because it would neither address project impacts nor meet regulatory requirements for acceptance as a mitigation project.

C-032-021

Please see the response to Comment C-032-017. Although some trees would be removed from the project limits of construction, WSDOT will

minimize the removal of specimen trees in the Arboretum. If removal is unavoidable, WSDOT will replant or replace the trees.

C-032-022

The Preferred Alternative does not affect the planted medians along Lake Washington Boulevard, however it does include the addition of a new planted median in the section between Montlake Boulevard and where Lake Washington Boulevard curves to the south. If the new planted median were added to the roadway, a context-sensitive design would be developed in coordination with the ABGC and the Section 106 consulting parties.

C-032-023

The Preferred Alternative would make physical changes to Lake Washington Boulevard, including widening it between Montlake Boulevard and where Lake Washington Boulevard curves to the south. At the intersection with East Montlake Boulevard, a right-turn lane would be added north of the westbound lane. These alterations would take place north of where Lake Washington Boulevard runs alongside the Arboretum. Therefore, project changes to Lake Washington Boulevard would not warrant installation of landscaping or buffers because the changes would not alter the character of the Arboretum. However, WSDOT will continue to coordinate with the ABGC on urban design standards, landscaping, and aesthetics throughout the remainder of the project.

C-032-024

Other than by collecting and treating drainage from the small portion of SR 520 where stormwater currently flows from the roadway onto Foster Island, the project would not affect stormwater management in the Arboretum. However, as part of the Azalea Way Pond project, identified in the Arboretum Mitigation Plan (Attachment 9 to the Final EIS),

WSDOT will restore the hillside seep wetland above the pond and plant the area with native species.

C-032-025

As discussed in the response to Comment C-032-002, design refinements included as part of the Preferred Alternative would reduce trip volumes on Lake Washington Boulevard in the Arboretum compared to the No Build Alternative. This reduction in traffic volume on Lake Washington Boulevard would have a positive effect on the Arboretum. Once completed, the Preferred Alternative would improve air quality and reduce traffic noise in the SR 520 corridor and in the Arboretum. Enhanced bicycle and pedestrian paths, improved clearance under SR 520 on Foster Island, and the removal of the Lake Washington Boulevard and R.H. Thomson Expressway ramps would improve visual quality throughout the park.

In developing the Arboretum Mitigation Plan, WSDOT worked closely with ABGC to ensure that construction and operational effects on the Arboretum would be adequately mitigated. Through the plan, WSDOT has committed to funding a number of mitigation measures for implementation throughout the Arboretum. Please see the Arboretum Mitigation Plan (Attachment 9 to the Final EIS) for more detailed information about mitigation measures that enhance the physical nature, educational value, and visitor experience of the Arboretum. Because toll revenues cannot be appropriated for non-roadway purposes, WSDOT will fund the agreed-upon measures as part of its project mitigation cost.

C-032-026

As discussed in the response to Comment C-032-002, the Preferred Alternative would remove the existing Lake Washington Boulevard eastbound on-ramp and westbound off-ramp and the R.H. Thomson Expressway ramps. There would no longer be direct access to Lake Washington Boulevard from SR 520. Access to Lake Washington

Boulevard by westbound SR 520 traffic would be moved to a new intersection on the Montlake Boulevard lid at 24th Avenue East. These changes would reduce traffic on Lake Washington Boulevard in the Arboretum compared to No Build. Please see Section 5.1 of the Final EIS for additional information.

C-032-027

NEPA and SEPA address mitigation for effects from a proposed project. There are no laws requiring mitigation for past actions. WSDOT plans to mitigate for project effects on the Arboretum by funding the measures identified in the Arboretum Mitigation Plan, which was developed in collaboration with ABGC. Please see the response to Comment C-032-001.

C-032-028

The Preferred Alternative does not include any new ramps in the Arboretum. The existing ramps in the Arboretum would be removed, and that area would be restored to a natural state. The Preferred Alternative would result in the least harm to Section 4(f) resources and the least overall harm, compared to the other alternatives considered in the Section 4(f) evaluation. Please see the Section 4(f) Evaluation (Chapter 9 of the Final EIS) for more information.

C-032-029

As previously discussed, the Preferred Alternative does not include direct access to Lake Washington Boulevard from SR 520. Lake Washington Boulevard is designated as an arterial street by the City of Seattle, and because traffic on this transportation facility would be lower with the Preferred Alternative than under No Build, there is no “constructive taking.”

C-032-030

The Preferred Alternative does not include direct access to Lake Washington Boulevard from SR 520. Access to Lake Washington Boulevard by westbound SR 520 traffic would be moved to a new intersection located on the Montlake Boulevard lid at 24th Avenue East. Although traffic may still use Lake Washington Boulevard for access to SR 520, this is consistent with its designation by the City of Seattle as an arterial street. SDOT has committed to work with the ABGC and WSDOT to explore further traffic management measures for this area that could result in further reductions in traffic volumes on Lake Washington Boulevard beyond those resulting from the Preferred Alternative.

C-032-031

Please see the response to the previous comment. Lake Washington Boulevard is an arterial street and is managed by the City of Seattle. WSDOT does not compensate for the public use of city streets that provide access to its facilities. As previously discussed, the Preferred Alternative would reduce traffic volumes on Lake Washington Boulevard through the Arboretum compared to the No Build Alternative.

C-032-032

The Preferred Alternative does not include direct access ramps to and from Lake Washington Boulevard on SR 520. However, SDOT and WSDOT will work with the ABGC to study the possibility for future tolling of vehicles that use Lake Washington Boulevard to access SR 520. Any net revenue generated by such a toll would be subject to legislative appropriation.

C-032-033

Traffic reductions on Lake Washington Boulevard and removal of the Lake Washington Boulevard ramps would improve the setting and feeling of the Arboretum. WSDOT has committed to helping ensure that

mitigation wetlands in the Arboretum provide educational experiences and opportunities for collaboration with Arboretum staff and UW faculty and students during planning, development, and ongoing maintenance. WSDOT will also implement signing and other measures consistent with the Arboretum Interpretive and Wayfinding Plan in areas being improved as part of the SR 520, I-5 to Medina project.

C-032-034

As noted in previous comments, traffic on Lake Washington Boulevard is expected to decrease compared to the No Build Alternative. However, as part of the Arboretum Mitigation Plan (Attachment 9 to the Final EIS), WSDOT has committed to funding traffic-calming measures on Lake Washington Boulevard and to working with the Seattle Department of Transportation to develop other measures that will improve traffic management in the Arboretum.