



DATE: March 22, 2010; updated April 13, 2002
TO: Stephanie Brown, Seattle Department of Transportation
FROM: David Graves, AICP, Senior Planner
SUBJECT: SR 520 Supplemental Draft Environmental Impact Statement

L-008-001

Attached are comments of Seattle Parks and Recreation on the SR 520, I-5 to Medina Bridge Replacement and HOV Project Supplemental Draft Environmental Impact Statement (SDEIS). The purpose of this memo is to highlight selected policy issues of substantial significance that should be brought forth in the City's response to the SDEIS.

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

Comments

L-008-002

Seattle Parks & Recreation respectfully submits the following comments in response to the Supplemental Draft Environmental Impact Statement (SDEIS) for the I-5 to Medina: Bridge Replacement and HOV Project issued on January 22, 2010:

- **Bagley Viewpoint** - Bagley Viewpoint is a well visited viewpoint along Delmar Drive East which provides views to the east of Lake Washington, Montlake Cut, the University of Washington and the Cascade mountain range. No other viewpoint in Seattle provides this unique view to the east. The viewpoint was redeveloped following the construction of the access freeway to the Evergreen Point floating bridge in 1963. The freeway cut the viewpoint off from its previous connection to Interlaken Park.

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Since the SDEIS was published, FHWA and WSDOT have identified a Preferred Alternative that is most similar to Option A, but includes a number of design refinements that minimize the effects presented in the SDEIS. These refinements respond to comments made on the SDEIS and to WSDOT's work with many project stakeholders under Engrossed Substitute Senate Bill (ESSB) 6392, which was passed by the Washington State Legislature in 2010. Please see Chapter 2 of the Final EIS for a description of the planning process and the Preferred Alternative.

Section 4(f) of the Department of Transportation Act of 1966 states that FHWA can approve a transportation project that uses Section 4(f) lands if the determination has been made that there is no feasible or prudent alternative to using that property and if all possible planning has been conducted to minimize harm to the Section 4(f) resources.

Because there are no alternatives that would avoid a Section 4(f) use while satisfying the project purpose and need, WSDOT determined that there is no feasible or prudent alternative to using land from several Section 4(f) properties in the SR 520, I-5 to Medina corridor. The Preferred Alternative evaluated in the Final EIS would result in the least harm to Section 4(f) properties, and the least overall harm, compared to the other alternatives considered in the Section 4(f) evaluation.

Mitigation has been proposed for effects on park resources in consultation with the Seattle Parks and Recreation Department and other agencies with jurisdiction over park resources. Please see the Final Section 4(f) Evaluation (Chapter 9 of the Final EIS) and the Arboretum Mitigation Plan (Attachment 9 to the Final EIS). Please see the responses below regarding the specific resources mentioned in the comment.

L-008-002

- o Loss of this unique viewpoint must be mitigated. The SDEIS indicates that a lid is proposed in this area that will provide similar view functions and also serve to reconnect the neighborhood through the triangle between 10th Avenue East, East Roanoke Street and East Delmar Drive. WSDOT must ensure that this lid remains part of the project and does not get removed due to funding concerns. Absent the lid, WSDOT must provide a view opportunity similar to the one provided by Bagley Viewpoint and work to reconnect this viewpoint to Interlaken Park as it was originally constructed.

L-008-003

- **Montlake Playfield** - While physical impacts to the playfield associated with the SR 520 project will be minimal, the visual impacts and noise associated with the project, both during construction and after it is completed, will be significant. Every effort must be made to limit the potential for noise from the freeway to impact users of the playfields, members of the public who come to the area to take advantage of the newly reconstructed hand-carried boat launch, and the public and fauna that use the newly enhanced wetland areas.

L-008-004

- o During construction, any temporary work bridges and/or barges must not restrict canoe/kayak access between the Montlake Playfield boat launch and Portage Bay.

L-008-005

- o Parks is just completing a large wetland restoration project along the perimeter of Montlake Playfield. There are additional wetland enhancement opportunities available. Montlake Playfield should be considered for any required wetland mitigation/enhancement as part of the projects mitigation requirements.

L-008-006

- o Parks owns submerged lands associated with the playfield. The submerged areas provide habitat opportunities on lands in public ownership protected from development. Impacts and/or intrusion onto these lands, either permanent or temporary during construction, must be appropriately mitigated.

L-008-007

- **West Montlake Park** - While there will likely be no physical impacts to this park associated with the SR 520 project, the visual impacts and noise associated with the project, both during construction and after it is completed could be significant. Every effort must be made to limit the potential for noise from the freeway to impact users of the park.

L-008-008

- **Lake Washington Boulevard** - Lake Washington Boulevard is referred to as a city street throughout the Supplemental Draft Environmental Impact Statement for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project (SDEIS). The 4f evaluation fails to identify Lake Washington Boulevard as either a historic resource or a park and recreation resource. This officially designated park boulevard is a 204-acre, 9.2-mile-long linear park wholly owned by the City and under the jurisdiction of Seattle Parks and Recreation. It is a crucial element in the 1903 Olmsted Plan for the Seattle's boulevard system, sometimes referred to as the "Emerald Necklace." Decisions about the future design of the SR 520 improvements must be made with the understanding that Lake Washington Boulevard was never designed to function as an extension of direct-access ramps to and from SR 520. Where Lake Washington Boulevard serves as a corridor through the Arboretum, vehicles and bicycles must be able to travel on it in a manner consistent with the design and intent of the surrounding Arboretum.

L-008-002

The lids identified in the Preferred Alternative are an integral part of the SR 520, I-5 to Medina project and will be built at the same time as the corresponding portion of the corridor. WSDOT will construct a new viewpoint on the 10th Avenue East/Delmar Drive East lid that will recreate the experience the Bagley Viewpoint was designed to provide (see the Final Section 4(f) Evaluation in Chapter 9 of the Final EIS for further discussion).

During design planning, the community identified pedestrian connections and improved traffic flow as the two most important purposes for this lid. The new 10th Avenue East/Delmar Drive East lid would function as a vehicle and pedestrian crossing, a landscaped area, and open space. A walkway across the lid would connect the two streets. The lid would range from 500 to 650 feet long (because of the angled lid edge) and would reconnect neighborhoods on both sides of the SR 520 corridor by providing walkways and open spaces above the SR 520 roadway. The lid would incorporate additional pedestrian connections between 10th Avenue East and Delmar Drive, redevelopment of the path from Bagley Viewpoint to Boyer Way, redevelopment of the Bagley Viewpoint Park, and vista points to overlook Lake Union, Portage Bay, and the panoramas east- and westward.

L-008-003

The Preferred Alternative includes a number of noise reduction strategies that would reduce traffic noise levels in the area of Montlake Playfield, relative to No Build and existing conditions, to the point that noise walls would not be recommended on the Portage Bay Bridge. These strategies include 4-foot concrete traffic barriers with noise-absorptive coating, a reduced speed limit on the Portage Bay Bridge, and noise-absorptive materials around the Montlake lid portals. When the Preferred Alternative is completed, noise levels in the vicinity of the Montlake Playfield would be lower than existing noise levels and year

L-008-008

- There should be no direct access from SR 520 to Lake Washington Boulevard. From the day it opened, SR 520 and the access ramps to and from Lake Washington Boulevard have encouraged and facilitated traffic through the Arboretum which would not otherwise be there. This increased traffic through the heart of the Arboretum limits access to 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.
- Lake Washington Boulevard has become an extension of the on/off ramps to SR 520. Had existing environmental laws been in place, mitigation of the impacts on the Arboretum of the original 520 project would have been significant or more likely, the project would have been redesigned. If direct access to and from SR 520 to Lake Washington Boulevard remains a part of the future project, exacerbating the current condition, the Arboretum should be duly compensated for the use of the boulevard in the future.
- As mitigation for the increased traffic on Lake Washington Boulevard directly attributable to SR 520, traffic calming measures should be implemented on the boulevard.
- If the SR 520 project includes direct access ramps to and from Lake Washington Boulevard to access SR 520, additional tolls should be included on these ramps. Tolls should be included as a way of travel demand management to discourage people from using Lake Washington Boulevard to access SR 520. Also, the revenue from these tolls should be dedicated to the Arboretum to help mitigate the impacts of the increased noise, air emissions and vehicular distraction on the physical nature, educational value and visitor experience of the Washington Park Arboretum.

L-008-009

- **Washington Park Arboretum** - The Washington Park Arboretum, State Arboretum for the State of Washington, is a stunning gem in Seattle's park system. It provides respite, scenery, recreation and solace to thousands of visitors in every season of the year. It provides educational, recreational, conservation and volunteering opportunities to those who seek it out. The City of Seattle and the University of Washington have been cooperatively managing this park since the original 1934 agreement.
 - Since the SR 520 highway was opened, the Arboretum has been fractured by the highway structure itself and the noise, pollution and visual intrusion of the structure on the physical nature, educational value and visitor experience of the Washington Park Arboretum. A percentage of the tolls collected on the main line of SR 520 should be dedicated to improvements in the Arboretum as mitigation for past, current and future impacts of siting a transportation facility in the heart of a natural area and arboretum.
 - The physical nature, educational values and visitor experience within the Washington Park Arboretum should be enhanced by the construction and operation of the SR 520 I-5 to Medina: Bridge Replacement and HOV project if properly designed with sensitivity to the park.

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2030 conditions with the No Build Alternative. The noise reduction strategies included in the Preferred Alternative would reduce noise levels along the corridor to the point that noise walls are not recommended in the Seattle portion of the project area, except potentially along I-5 in the North Capitol Hill area where the reasonableness and feasibility of a noise wall is still to be evaluated. Information on noise modeling results for the Preferred Alternative can be found in Section 5.7 of the Final EIS and the Noise Discipline Report Addendum (Attachment 7 to the Final EIS).

While the SR 520, I-5 to Medina project would include a wider, and in some locations higher, Portage Bay Bridge than currently exists, it would not diminish the character, vividness, intactness, or unity of views of the Portage Bay Bridge compared to the No Build Alternative. Views of the Portage Bay Bridge from Montlake Playfield would change because the Preferred Alternative would include a bridge designed to be context-sensitive and compatible with its surroundings; this change is expected to be positive. A planted median along the center of the Portage Bay Bridge would screen views of the lanes on the other side of the median, which would make the bridge appear narrower to viewers in the park. The bridge would also include wider spaces between columns than the current bridge.

Construction activities in the vicinity of Montlake Playfield would include pile-driving for the temporary work bridges alongside the length of the Portage Bay Bridge (plus the one in Montlake Playfield for the Montlake Boulevard off-ramp); demolition of the existing Portage Bay Bridge; and construction of the new Portage Bay Bridge and Montlake Boulevard off-ramp. Impact pile-driving associated with the work bridges would occur during an 11-month period. Other construction activities would generate dust, noise, and vibration, and would result in changes to views from the park for the duration of the 63-month construction period. Best management practices, including those already developed and used as a matter of policy by WSDOT, would be implemented to protect the park

L-008-009

- All efforts must be made to avoid any adverse impacts to the Arboretum, both during construction and through the long term operation of the SR 520 facility.
- To the extent that there will be adverse impacts to the Arboretum, every impact must be thoroughly mitigated.
- Unavoidable adverse impacts must be mitigated. Those of shorter duration must be addressed during the construction phase. Long term impacts of facilitating increased traffic through the Arboretum which has a direct impact on the physical nature, educational value and visitor experience in the Washington Park Arboretum need to be avoided through sound design or mitigated appropriately.
- Design of the new structure should address the potential for increased noise through the Arboretum as a result of the increased traffic. The project must be designed such that noise levels decrease from the levels experienced today.

L-008-010

- The project must be designed such that the visual impact of the structure complements and does not detract from the physical nature, educational value and visitor experience of the Washington Park Arboretum. Designing a “signature” bridge does not reduce the visual impact of a concrete and/or steel structure in the heart of a 230-acre arboretum.

L-008-011

- **Washington Park Arboretum Master Plan** - In May 2001, the Seattle City Council approved the long-range master plan for the Washington Park Arboretum, creating a road map for Arboretum improvements over the next 20 years. The master plan ensures the Washington Park Arboretum will effectively fulfill three primary purposes—conservation, recreation and education—for decades to come. Together, University of Washington Botanic Gardens and Seattle Parks and Recreation, with support from the Arboretum Foundation, are working to implement the master plan. Substantial public and private funds have recently been raised and spent to improve the visitors’ experience. The Pacific Connection Gardens have been newly created, the Japanese Garden Gatehouse has been redeveloped and a number of other park improvements have been made. All these contributions will likely be negatively impacted by the proposed SR 520 project.
 - The Master Plan adopted in 2001 made note of the fact that there would be limited new buildings built within the Washington Park Arboretum. Instead, UW, the Arboretum Foundation and Seattle Parks and Recreation would address their long term need for additional educational, maintenance and classroom space by expanding into the building which currently houses the Museum of History and Industry (MOHAI), once MOHAI vacated the building. The City of Seattle owns the building which MOHAI currently occupies. Since all of the options in the SDEIS involve expansion of the roadway such that the MOHAI will be demolished, WSDOT must provide replacement space as envisioned in the Master Plan.
 - There are four significant projects at the north end of the Arboretum which are identified in the Arboretum Master Plan: Complete the Waterfront Trail as a loop all the way around Duck Bay; Add access, sitting and viewing areas on the west side of Duck Bay; Daylight

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from construction-related effects such as dust, vibration, noise, light and glare, and accidental damage from construction equipment. To the extent possible, WSDOT would limit the noisiest construction activities to the least active times at area parks (not weekends or special events).

L-008-004

Construction of the Preferred Alternative would not restrict launch of hand-carried boats from existing launch sites in south Portage Bay.

However, access beneath the Portage Bay Bridge would be limited at times during construction for reasons of public safety.

L-008-005

WSDOT has coordinated with the City of Seattle Parks and Recreation Department to discuss potential wetland mitigation opportunities. City-owned sites, such as Montlake Playfield, Magnuson Park, and Seward Park, were discussed as part of the Natural Resources Technical Working Group (NRTWG). Representatives from the Seattle Parks and Recreation Department and the Seattle Department of Planning and Development participated in the NRTWG process. Following meetings with Parks and Recreation staff, the Montlake Playfield wetland restoration opportunities were ultimately not advanced as mitigation sites because of their size and mitigation value. Please see the Conceptual Wetlands Mitigation Plan (Attachment 9 to the Final EIS).

L-008-006

Since the Draft Section 4(f)/6(f) Evaluation was published, FHWA and WSDOT have agreed, at the request of the City of Seattle as the agency with jurisdiction, to treat submerged parklands as Section 4(f) properties in the Montlake Playfield and the Washington Park Arboretum. WSDOT has conducted all possible planning to minimize harm to Section 4(f) resources. Please see the Final Section 4(f) Evaluation (Chapter 9 of the Final EIS) for updated findings and analysis. WSDOT is proposing to use

L-008-011

Arboretum Creek; and, Create an entry at the west/north end of the Arboretum with the same grand character as the south entry. The redevelopment of SR 520 may negate the potential to undertake some or all of these projects to the detriment of the Arboretum and contrary to the goals set out in the Master Plan. To the extent mitigation measures are necessary as a result of unavoidable significant impacts associated with the SR 520 project; these identified Arboretum Master Plan project should be fully funded by WSDOT for implementation by Parks and/or UW.

L-008-012

- In addition to the above identified Parks properties, there are other lands linked to these parks adjacent to the SR 520 corridor that will be impacted by the project. While these pieces of linked property are not all city-owned, the linked recreational areas are still important to the city, and each of its parts is important. The SR 520 project will do excessive damage to these properties.

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.

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.

a portion of the WSDOT peninsula as part of a wetland mitigation project and is exploring the feasibility of using the remainder of the WSDOT-owned land in the peninsula area for mitigation for effects on parks in the project area.

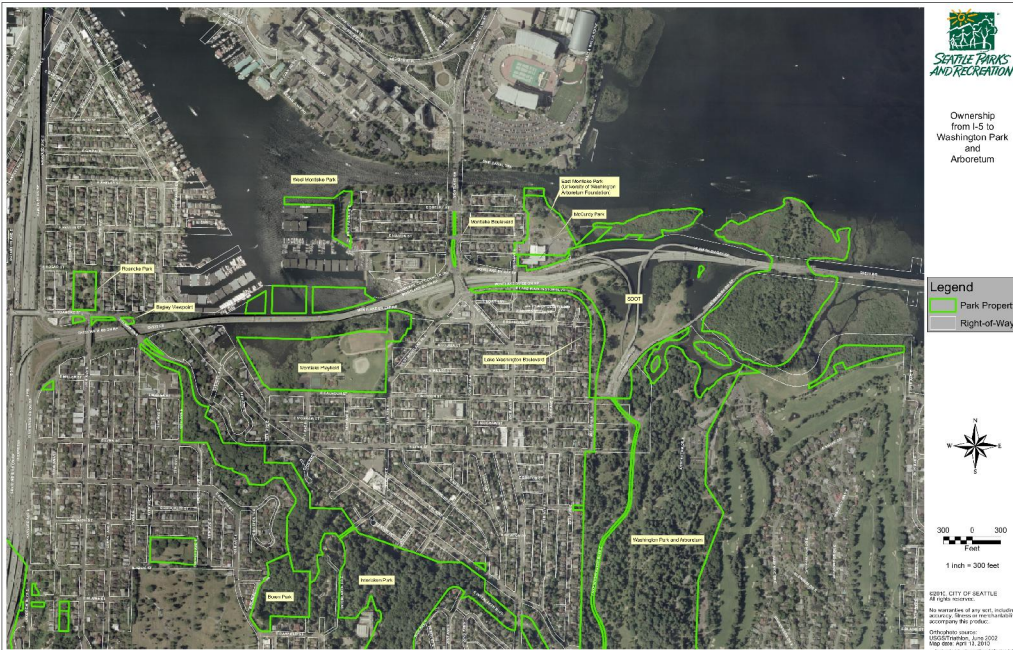
L-008-007

In addition to the noise reduction strategies discussed in comment L-008-003, tThe Preferred Alternative includes an alignment shift that would locate the east end of the Portage Bay Bridge further south than Option A, reducing potential noise and visual quality effects on West Montlake Park. Please see the response to Comment L-008-003 regarding operational noise. With the Preferred Alternative, operational noise levels in the vicinity of the West Montlake Park would be slightly lower than both existing noise levels and year 2030 No Build Alternative noise levels.

Changes in the quality of views from West Montlake Park would be low or barely noticeable compared to existing conditions. Please see the Visual Quality and Aesthetics Discipline Report Addendum (Attachment 7 to the Final EIS) for further information.

L-008-008

The Preferred Alternative would remove the Lake Washington Boulevard ramps, resulting in a reduction in trip volumes on Lake Washington Boulevard in the Washington Park Arboretum. 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. Please see the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for further discussion of trip volumes. As part of the Arboretum Mitigation Plan (please see Attachment 9 to the Final EIS), WSDOT has also committed to fund



traffic calming measures along Lake Washington Boulevard and to work with the Seattle Department of Transportation on further measures to manage traffic in the Arboretum.

One of WSDOT’s key efforts under ESSB 6392 was to work with the Arboretum and Botanical Garden Committee (ABCG), of which the Seattle Parks and Recreation Department is a member, to identify appropriate mitigation for effects of the SR 520, I-5 to Medina project on the Washington Park Arboretum. This work involved review of the Arboretum Master Plan and commitments by WSDOT to provide funding toward a number of projects in the plan. This 8-month coordination effort resulted in the Arboretum Mitigation Plan, which is included in Attachment 9 of the Final EIS.

The approximately 2-mile-long segment of Lake Washington Boulevard that runs from NE Pacific Street to East Madison Street is acknowledged as a designated park boulevard and evaluated as such in the Final EIS, the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS), the Recreation Discipline Report Addendum (Attachment 7 to the Final EIS), and discussed in the Final Section 4(f) Evaluation (Chapter 9 of the Final EIS). WSDOT also evaluated this segment of Lake Washington Boulevard as historic property that is eligible for the National Register of Historic Places (NRHP). However, under this designation it remains a city arterial street; the Seattle Department of Transportation has not defined special traffic restrictions or other protective measures for park boulevards. It should also be noted that Lake Washington Boulevard was discussed in the Final Section 4(f) Evaluation as a historic property, not as a park property. Lake Washington Boulevard is a transportation facility undergoing transportation improvements as a part of this project. The integrity of the historic property would not be diminished as a result of those improvements and the official with jurisdiction has not objected to this finding. Therefore, Lake Washington Boulevard is excepted from

Section 4(f) in accordance with 774.13(a).

Over the long term, the Preferred Alternative, in comparison to the No Build Alternative, would improve regional air quality and reduce noise in the Washington Park Arboretum. As documented in the SDEIS and Final EIS and in the Air Quality Discipline Report and Addendum, criteria pollutant emissions and air toxics would decrease from existing conditions by 2030. In addition, the reduction in traffic on Lake Washington Boulevard compared to the No Build Alternative would result in further reduced vehicle emissions in the Arboretum. Therefore, air quality in the Arboretum with the Preferred Alternative is expected to be similar to, or slightly improved over, No Build Alternative conditions. With the Preferred Alternative, noise levels in the Arboretum in the areas closest to SR 520 would be lower than the No Build Alternative. The proposed noise reduction approach would also avoid the aesthetic effects of noise walls in this natural area. Please see the response to Comment L-008-003 regarding the noise reduction features of the Preferred Alternative.

L-008-009

The Preferred Alternative has benefited from extensive input from agencies and the public during NEPA/SEPA evaluation, and as a result has further minimized effects on the Washington Park Arboretum compared to designs studied previously. Please see the response to Comment L-008-008 regarding traffic volumes, noise levels, air quality, and mitigation planning and funding for the Arboretum. The Preferred Alternative would remove the existing Lake Washington Boulevard ramps to and from SR 520, reduce traffic volumes and noise levels in the Arboretum, and reduce air pollutant emissions. In addition to the reduction in traffic associated with the existing Lake Washington Boulevard ramps, the Preferred Alternative has been designed to minimize the footprint of SR 520 across Foster Island to the maximum extent possible while accommodating potential future light rail through

the corridor. The Preferred Alternative includes a narrow footprint across Foster Island, with reduced right-of-way acquisition in the Arboretum compared to the SDEIS options. In addition, a constant-slope profile would improve the clearance of the crossing above the Arboretum Waterfront Trail from its existing 8 feet to between 14 and 20 feet. The higher clearance also would improve conditions for wetland vegetation east and west of the island. Please see the Ecosystems Discipline Report Addendum (Attachment 7 to the Final EIS) for further discussion of effects on wetlands. Also see the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) for discussion effects on the Arboretum and Foster Island as cultural resources.

As noted in the response to Comment L-008-008, WSDOT worked with the Arboretum and Botanical Garden Committee to develop a mitigation plan for the Arboretum as required by ESSB 6392. The group identified Arboretum resources that could be affected by the SR 520, I-5 to Medina project; clarified effects on identified resources; identified appropriate mitigation opportunities within the Arboretum for these effects; provided an information link to and from legislative and regulatory technical working groups; and submitted a final plan to the Governor and the Transportation Committees of the Washington State Legislature on date. WSDOT will continue to work with the Arboretum and Botanical Garden Committee to ensure that project effects on the Arboretum will be minimized as much as possible and to implement the agreed-upon mitigation for remaining project impacts. As part of the plan, WSDOT, in consultation with the ABGC, will develop a design review plan for landscaping and recreational facilities within the right-of-way to minimize effects of the new bridge on the Arboretum. Because Foster Island is a Traditional Cultural Property, this effort will also include the tribes.

Regarding construction effects, WSDOT, through the Section 106 process, has coordinated with the Section 106 consulting parties to

identify ways to avoid, minimize, or mitigate the adverse effect of the project on historic properties. This consultation process resulted in a Section 106 Programmatic Agreement, which is included in Attachment 9 to the Final EIS. As specified in the Programmatic Agreement, WSDOT is developing a Community Construction Management Plan to address overall construction effects within the project area. WSDOT will also work with the City of Seattle to prepare a construction traffic management plan. Current construction sequencing plans call for improvements to the Montlake interchange to be completed before closure of the Lake Washington Boulevard ramps. Please see Chapters 3 and 6 of the Final EIS for further discussion of detour routes and their effects.

L-008-010

Please see the responses to comments L-008-001 and L-008-008 regarding removal of the Lake Washington Boulevard ramps, and L-008-009 regarding the change in the bridge profile across Foster Island. With the Preferred Alternative, while the new SR 520 roadway would be wider and higher than the existing structure, the visual quality analysis found that operation of the SR 520, I-5 to Medina project would not result in a change in the character, vividness, intactness, or unity of views in the Washington Park Arboretum and its vicinity. Please see the Visual Quality and Aesthetics Discipline Report Addendum (Attachment 7 to the Final EIS) for visualizations related to the Arboretum with the Preferred Alternative, showing views from the trail, views of Marsh Island, and views of the SR 520 west approach bridge within the Arboretum. The Addendum also includes two new viewpoints approximately 100 feet from the bridge, showing the bridge profile of the Preferred Alternative over Foster Island. As discussed in the response to the previous comment, WSDOT is working to create a context-sensitive bridge design across the island and to avoid or minimize effects on culturally sensitive locations. Please see the responses to comments L-008-008 and L-008-

009 for more information regarding mitigation planning for the Arboretum.

L-008-011

Please see the response to Comment L-008-008 regarding the Arboretum Mitigation Plan (Attachment 9 to the Final EIS). Through this effort, WSDOT has committed to provide funding toward a number of projects in the Arboretum Master Plan. The Arboretum Mitigation Plan was unanimously approved by the Arboretum and Botanical Gardens Committee in December 2010. Because the demolition of the MOHAI facility would not result in direct or indirect adverse effects on the Arboretum and would not alter the integrity of historic properties within the Arboretum, additional space for educational materials is not included in the mitigation plan.

L-008-012

Without further information, it is unclear which specific lands are referred to in this comment. The Recreation Discipline Report and Addendum (Attachment 7 to the Final EIS) provides analysis of recreational resources, including non-park resources, in the SR 520, I-5 to Medina project area, such as resources used for recreational boating.

The land area adjacent to the Washington Park Arboretum and SR 520 known as the “WSDOT peninsula” is not subject to Section 4(f) as a recreational property. It was purchased for transportation purposes and still contains operating transportation facilities. The agreement between WSDOT and the City of Seattle regarding this WSDOT right-of-way holds that, while the state allows Seattle to use and maintain portions of the property for park purposes, the property remains under WSDOT ownership and must be relinquished within 90 days if WSDOT needs it for transportation purposes (please see page 30 of the SDEIS Cultural Resources Discipline Report). FHWA has determined that the peninsula property is not a recreation resource for the purposes of Section 4(f). In

addition, rather than being adversely affected, the peninsula would be benefited by removal of the existing Lake Washington Boulevard ramps and the R.H. Thomson Expressway ramps.