



U.S. Department  
of Transportation

**Federal Highway  
Administration**

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June 18, 2008

HDA-WA/[SR 520

Julie Meredith  
Washington State Department of Transportation  
SR 520 Project Director  
600 Stewart Street, Suite 520  
Seattle, WA 98101-1209

SR 520 Approval of a Separate  
Transit and HOV Improvements Project

Dear Ms. Meredith:

I have reviewed your June 18, 2008 letter, which requested FHWA approval to develop the Eastside Transit and HOV Improvements Project as a separate project. After consultation with environmental staff in the Washington Division as well as with staff in FHWA's Office of the Chief Counsel and Office of Project Development and Environmental Review, I approve your request. This new project meets the criteria for development of a new project that is specified in 23 CFR 771.111(f).

Sincerely yours,

Stephen P. Boch PE  
Major Project Oversight Manager

Cc: Heather Catron, WSDOT, SR 520  
Sharon Love, FHWA, Washington Division  
David Ortez, FHWA, Legal Counsel  
Chip Larson, FHWA, Office of Project Development and Environmental Review

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June 18, 2008

Mr. Stephen Boch, P.E.  
Major Project Oversight Manager  
Federal Highway Administration  
Jackson Federal Building  
915 Second Avenue, Room 3142  
Seattle, Washington 98174

Letter Number: 0045  
Y-TSO  
SR 520 Program  
AGR\_ULT(PUB)

Re: Discussion of Logical Termini and Independent Utility for SR 520 Eastside Transit and HOV Improvements Project

Dear Mr. Boch:

The purpose of this letter is to request FHWA's concurrence with our determination that constructing improvements to SR 520 from the Evergreen Point transit stop to SR 202 (the Eastside Transit and HOV Improvements Project) is a project that meets the criteria specified by FHWA regulation 23 CFR 771.111(f). This project is being developed to reduce transit and HOV travel times and to enhance travel time reliability, mobility, access, and safety for transit and high-occupancy vehicles in rapidly growing areas along the SR 520 corridor east of Lake Washington. We propose to move forward with an Environmental Assessment to document the project's environmental impacts. We understand that if we find there are significant environmental impacts that cannot be mitigated, we would need to develop an Environmental Impact Statement (EIS).

### **What is the background of the Eastside Transit and HOV Improvements Project?**

In 1997, following a legislative mandate, the Washington State Transportation Commission initiated the Trans-Lake Washington Study, with the goal of identifying ways to improve transportation across and/or around Lake Washington. Although the key problem that led to the study was severe and growing congestion on SR 520, the 47-member Trans-Lake Study Committee considered improvements in an area bounded by I-90 to the south, SR 522 to the north, I-5 to the west, and the eastern end of SR 520 to the east. The study was designed to consider many possibilities in the proposed solutions. Potential solutions included increasing capacity for moving people and vehicles, managing travel demand, providing new or enhanced bicycle and pedestrian facilities, and enhancing environmental protection. The most promising solutions were then advanced into a phase of more detailed design and study, including an environmental impact statement (EIS).

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The Notice of Intent was issued for the SR 520 EIS in late 2000. The original project limits were from I-5 in Seattle on the west to SR 202 in Redmond on the east. However, project funding was eliminated in 2002 and only partially reinstated in 2003. For this reason, the eastern project limit was changed to 108<sup>th</sup> Avenue NE in Bellevue. At this time, the project ceased to be the Trans-Lake Washington Project and was renamed the SR 520 Bridge Replacement and HOV Project. A Draft EIS (DEIS) was published in August 2006. The DEIS evaluated a No Build Alternative, a 4-Lane Alternative (four general-purpose lanes), a 6-Lane Alternative (four general-purpose plus two HOV lanes), and several design options for the 6-Lane Alternative.

In late 2006, after considering the findings of the DEIS, Washington Gov. Christine Gregoire identified a "4+2" alternative (four general-purpose and two HOV lanes) as the state's preference for moving forward. This preference was endorsed by the Legislature in 2007. However, there was still considerable controversy in Seattle neighborhoods about the specific design options evaluated in the DEIS. In response to this controversy, the Legislature passed Engrossed Substitute House Bill 6099. Among other mandates related to SR 520, the bill required that a mediation process be established to define SR 520's alignment within Seattle. Mediation began in summer 2007 and will continue through late 2008.

On the Eastside, there was relatively widespread support for the 4+2 alternative. An additional piece of legislation passed in 2008 directs WSDOT to study the potential for accelerating improvements on the Eastside.

In March 2008, Gov. Gregoire highlighted the importance of the SR 520 project to the region and state by announcing an accelerated project schedule. Assuming that environmental review and permitting are completed on schedule, a new, four-lane Evergreen Point Bridge is proposed to open in 2014, with expansion to six lanes by 2016.

A separate, but related program that affects SR 520 is the Urban Partnership Agreement (UPA), which USDOT approved in late 2007. The UPA is planned to fund a variety of projects in the SR 520 corridor to reduce congestion, including purchase of new buses, park-and-ride improvements, active traffic management, and variable tolling. Variable tolling would begin in 2009, several years earlier than the SR 520 bridge would be replaced. The legislation that requires WSDOT to evaluate accelerating Eastside improvements ties the construction time frame to this period of "pre-construction tolling."

### **Why is a separate project needed now?**

Since the Notice of Intent for the SR 520 corridor was published in 2000, a number of circumstances have changed. Following the dot-com bust and recession of 2001-02, the

communities east of Lake Washington have grown at a much faster pace than Seattle, creating a new set of transportation needs. Increasingly, residents of these communities are using transit to move from place to place. Transit agencies are responding with plans for enhanced service—and these plans rely on SR 520 as a critical backbone to link east-west and north-south trips.

Key reasons that a separate project is needed now include:

- ***To support current and planned growth on the Eastside.*** The population of the three Eastside urban centers along SR 520 is expected to grow by over 45,000 between 2000 and 2030. Employment in the three cities is on an even faster growth curve, with a 40% increase in jobs projected between 2000 and 2022. Three major redevelopment projects in the works adjacent to SR 520 are slated to add up to 10,000 new households and 12.5 million square feet of office and retail space.
- ***To support transit demand and planned service improvements.*** In the last eight years, transit use on the Eastside has increased by 30 percent, and transit ridership on SR 520 has risen by almost 50 percent. Programs now being planned or implemented will increase transit's mode share on the Eastside. These include King County Metro's Transit Now service expansion, transit and park-and-ride improvements funded under the Urban Partnership Agreement, and proposed future Bus Rapid Transit Service in the SR 520 corridor. Tolling proposed for SR 520 as part of the Urban Partnership Agreement is also expected to increase demand for transit by up to 35 percent starting in late 2009.
- ***To facilitate transit reliability and safety.*** The existing Eastside HOV system is incomplete. Where HOV lanes exist, they are located on the outside of the roadway, requiring merging vehicles to weave through faster-moving HOV traffic. Between I-405 and the Evergreen Point transit stop, the HOV lane uses the old shoulder as a travel lanes. In addition to creating congestion, these conditions have resulted in over 380 accidents during the last two years on westbound SR 520 between 124<sup>th</sup> Avenue NE and Evergreen Point. Buses are delayed up to 25 minutes in this congestion, affecting reliability throughout the transit system.

A map showing existing areas of concern in the SR 520 Eastside corridor is included as Attachment A to this letter.

### **What improvements are proposed as part of this project?**

The SR 520 Eastside Transit and HOV Improvements Project includes building a complete HOV system between Lake Washington and 108<sup>th</sup> Avenue NE and restriping the existing HOV lanes from the outside lanes to the inside lanes between the 108<sup>th</sup> Avenue NE interchange and SR 202 in Redmond. Specifically, the project includes, as

shown in Attachment B:

- **Completing the eastbound SR 520 HOV lane** from Lake Washington to the existing eastbound HOV lane west of the I-405 interchange. This improvement will complete the currently discontinuous HOV network on the Eastside and improve travel time reliability for buses and carpools.
- **Restriping HOV lanes from the outside lanes to the inside lanes** from Lake Washington to SR 202. This change will enhance safety by eliminating the existing need for merging vehicles to weave across the faster-moving HOV lanes to reach the general purpose lanes.
- **Building inside transit stops** at 92<sup>nd</sup> Ave NE and Evergreen Point Road. These transit stops will support the inside HOV lanes, and access will be integrated with the proposed lids over the highway.
- **Adding a bike/pedestrian path** between 108<sup>th</sup> Avenue NE and Evergreen Point Road. This will facilitate nonmotorized use of SR 520, provide transit connections for bikes and pedestrians, and complement the existing nonmotorized transportation network on the Eastside.
- **Constructing HOV direct access ramps at 108<sup>th</sup> Ave NE.** This improvement will connect SR 520 with 108<sup>th</sup> Ave NE, eliminating the need to connect to the South Kirkland Park & Ride via local streets and saving as much as 15 minutes.
- **Improving interchanges** at 84<sup>th</sup>, 92<sup>nd</sup>, Bellevue Way, and 108<sup>th</sup> Avenue NE.
- **Providing sound walls** between 108<sup>th</sup> Ave NE and Evergreen Point Road to reduce current and future high levels of highway noise.
- **Constructing a stormwater system** for areas where new impervious surface is added to improve water quality and reduce peak flows.
- **Building lids** at 84<sup>th</sup> and 92<sup>nd</sup> Avenue NE to reconnect communities divided by the original construction of SR 520 in the 1960s.
- **Improving and enhancing stream habitat** by making culverts passable and realigning Yarrow Creek, a salmon-bearing stream.

**Would the proposed improvements connect logical termini and be of sufficient length to address environmental issues on a broad scope?**

The proposed project encompasses the entire Eastside portion of the SR 520 corridor, 8.5 miles in length. The corridor serves the urban centers of Bellevue, Kirkland, and Redmond and the rapidly growing areas of east King County.

Eastside employment is on track to grow from about 225,000 in 2000 to about 317,000 in 2022—an increase of over 40 percent. This employment growth, coupled with proposals for large mixed-use developments and supportive transit policies in Bellevue and Redmond, makes the Eastside an urban center in its own right. As its communities strive for greater balance between jobs and housing, the Eastside requires a greater level of

transit service. Increasing gas prices and worsening congestion are also adding to transit demand, which has grown by 30 percent on the Eastside and by 50 percent in the SR 520 corridor over the last eight years. The proposed termini support much-needed transit service enhancements by providing a continuous HOV link between SR 520's major Eastside transit hub at Evergreen Point and the existing eastern end of the corridor.

Another important factor is the planned improvements in transit service on the Eastside, which require additional infrastructure on SR 520 to function effectively. These proposals have all been planned and funded within the last five years, reflecting changing regional conditions. King County's Transit Now program will significantly improve service on SR 520 as well as many connecting Eastside routes. The Urban Partnership Agreement is slated to add 45 buses to SR 520 service and to fund improvements to the South Kirkland Park-and-Ride—improvements which require direct access to SR 520 to achieve travel time benefits for transit vehicles. A legislatively mandated high-capacity transit plan for SR 520 designates the highway as a corridor for bus rapid transit in the future. Coupled with proposed tolling, which will create a disincentive to driving alone, these recent regional actions create the need for additional improvements on the Eastside.

The text below describes the proposed east and west termini for the project and the reasons that they are logical endpoints. Attachments C and D are conceptual depictions of both proposed termini.

### ***West Terminus***

The Evergreen Point freeway transit stop is the primary transfer point for people changing from local and regional north-south bus routes to the regional east-west service that operates on SR 520. In this sense, it is the transit equivalent of a highway interchange. Twenty-three bus routes, operated by both King County and Sound Transit, use this stop as a time and transfer point. (In comparison, 15 routes transfer at the Montlake transit stop on the west side of Lake Washington.) Buses that use the Evergreen Point stop serve the neighborhoods north and south of SR 520, neighboring cities, and destinations as distant as Totem Lake, Issaquah, and Renton. This makes it one of the key transit hubs of the Eastside, facilitating trips both across Lake Washington and to many points north, south, and east. For a project designed to enhance the operation of transit and HOVs, such a major regional linkage point is a logical terminus.

### ***East Terminus***

The SR 520/SR 202 interchange provides commuters in Redmond, the Sammamish Plateau, and east King County with access to SR 520 and is the easternmost interchange on the highway. The limited-access freeway terminates about a mile east of this interchange and connects with the local arterial network. The completed HOV system

would link to ongoing improvements at the east end of the corridor to widen SR 520 and SR 202 and to add an HOV lane with SR 202.

### **Do these improvements have independent utility or independent significance?**

The Eastside Transit and HOV Improvements Project provides independent benefit for the following reasons:

- ***The project would complete the Eastside transit and HOV system.*** The proposed transit improvements would create a complete and continuous Eastside transit and HOV system on SR 520. They would also provide direct access ramps for transit vehicles traveling between SR 520 and the South Kirkland Park & Ride at 108<sup>th</sup> Avenue NE. The project would provide the infrastructure and operational improvements to support planned population growth, economic expansion, and increases in transit service in the rapidly growing communities east of Lake Washington.
- ***The project would provide substantial travel time benefits to transit and carpools.*** Currently, buses and carpools on SR 520 experience significant congestion-related delay during peak periods. Under free-flow conditions, the trip from the SR 202 interchange to Seattle takes about 36 minutes; during peak travel periods, the same trip takes over an hour. Much of this delay occurs in the Eastside portion of the corridor. Immediately upon completion of the Eastside Transit and HOV Improvements Project, transit vehicles would see their travel time reduced by 5 minutes eastbound and 15 minutes westbound between the Evergreen Point transit stop and SR 202, as compared to “no build” conditions. By 2030, these transit travel time savings are estimated at 15 minutes eastbound and 60 minutes westbound.
- ***The project would enhance public safety.*** As noted above, in the last two years there have been 380 accidents on westbound SR 520 between 124<sup>th</sup> Avenue NE and Evergreen Point Road. The project would result in safer and more efficient operation of SR 520 on the Eastside by 1) separating merge movements between buses and other vehicles at the 108th Avenue NE and 84<sup>th</sup> Avenue NE interchanges; 2) eliminate weaves caused by general-purpose traffic needing to enter or exit via the outside HOV lanes; and 3) widening shoulders to current design standards.
- ***The project would support regional and local transit and land use plans and policies.*** Transit system and HOV improvements identified for this project are consistent with regional and local transit and multi-modal plans and policies, as well as policies geared specifically toward SR 520 that are identified in community comprehensive plans, bicycle and pedestrian plans, and the Urban Partnership Agreement. The project would also comply with ESHB 2878, which

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directs WSDOT to explore improvements in traffic flow on the Eastside between 2009, when tolling under UPA is implemented, and the proposed opening of the new Evergreen Point Bridge in 2014.

**Do these improvements restrict consideration of alternatives for other reasonably foreseeable transportation improvements?**

The proposed improvements to the Eastside portion of SR 520 would not preclude any reasonably foreseeable improvements being considered for other portions of SR 520 or connecting transportation facilities. At the proposed west terminus, the HOV lanes would tie in near the transition span for the Evergreen Point Bridge (see Attachment B). This configuration would be compatible with any of the bridge replacement alternatives studied in the SR 520 Bridge Replacement and HOV Project DEIS, including No Build. At the east end of the SR 520 corridor in Redmond, the proposed restriping of HOV lanes would be compatible with the current project to widen SR 520 and SR 202 (see Attachment C). The Eastside Transit and HOV Improvements Project also would not affect planned future improvements to I-405 in the area of the I-405/SR 520 interchange.

**How would an independent Eastside project change the SR 520 Bridge Replacement and HOV Project?**

If an independent Eastside project is approved, the SDEIS and FEIS for the SR 520 Bridge Replacement and HOV Project would cover only the portion of the project between I-5 in Seattle and the Evergreen Point flyer stop in Medina. Public comments received on the DEIS related to the Eastside would be addressed as part of the NEPA documentation for the new project. We currently do not anticipate issuing a new Notice of Intent for the SR 520 Bridge Replacement and HOV Project, but would inform the public of the changed project limits in conjunction with the public scoping process for the Eastside project.

We appreciate FHWA's consideration of this request. If you have any further questions regarding this letter, please contact me at (206) 770-3568.

Sincerely,



Julie Meredith  
WSDOT SR 520 Project Director

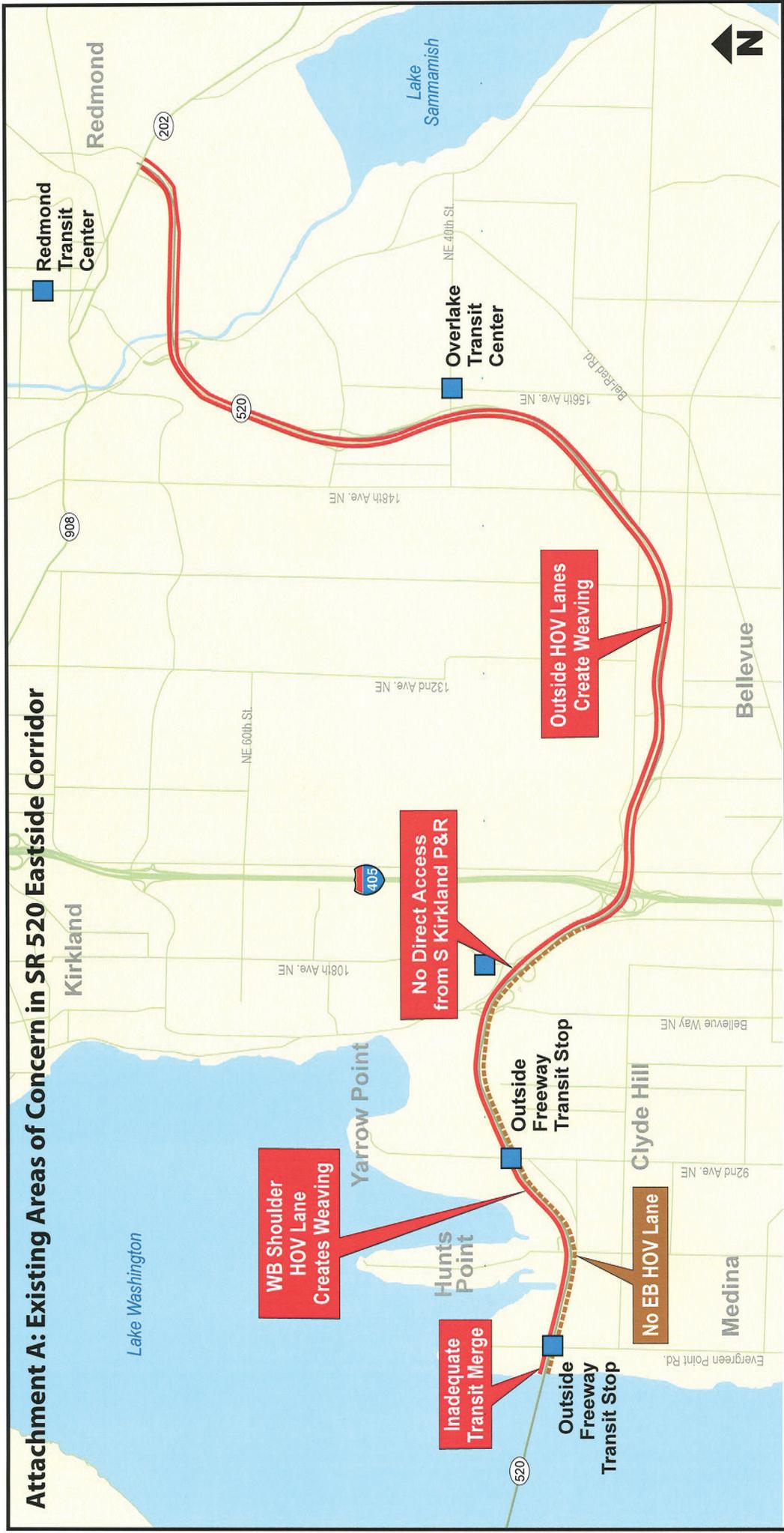
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Attachments:

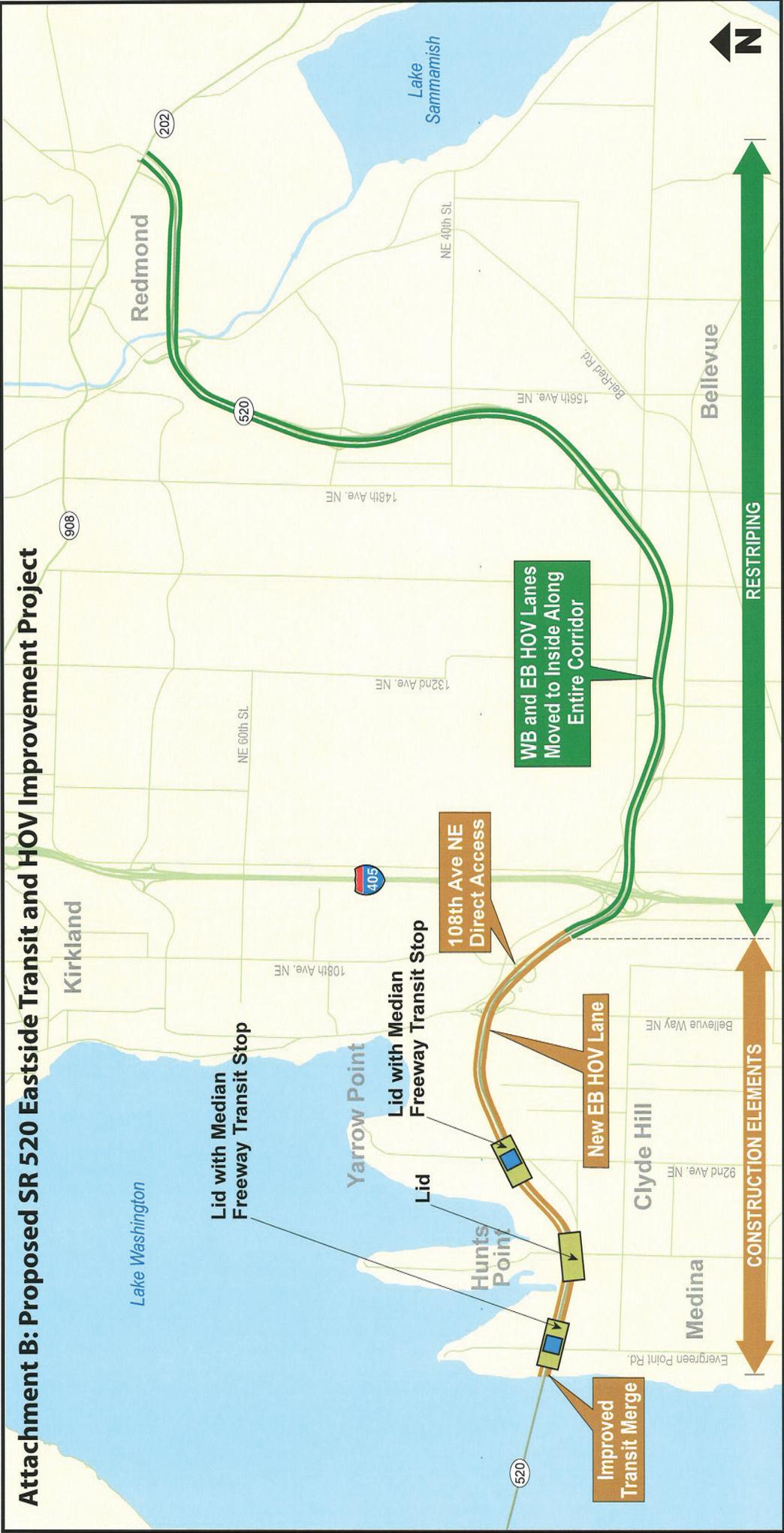
Deficiencies of Existing Eastside Transit and HOV Facilities  
Proposed Eastside Transit and HOV Facilities  
Proposed Western Terminus  
Proposed Eastern Terminus

Cc: Ron Paananen, WSDOT  
Heather Catron, WSDOT  
Larry Kyle, WSDOT  
Daniel Babuca, WSDOT  
Sasha Visconty, WSDOT  
Jenifer Young, WSDOT  
Sharon Love, FHWA, Washington Division

# Attachment A: Existing Areas of Concern in SR 520 Eastside Corridor



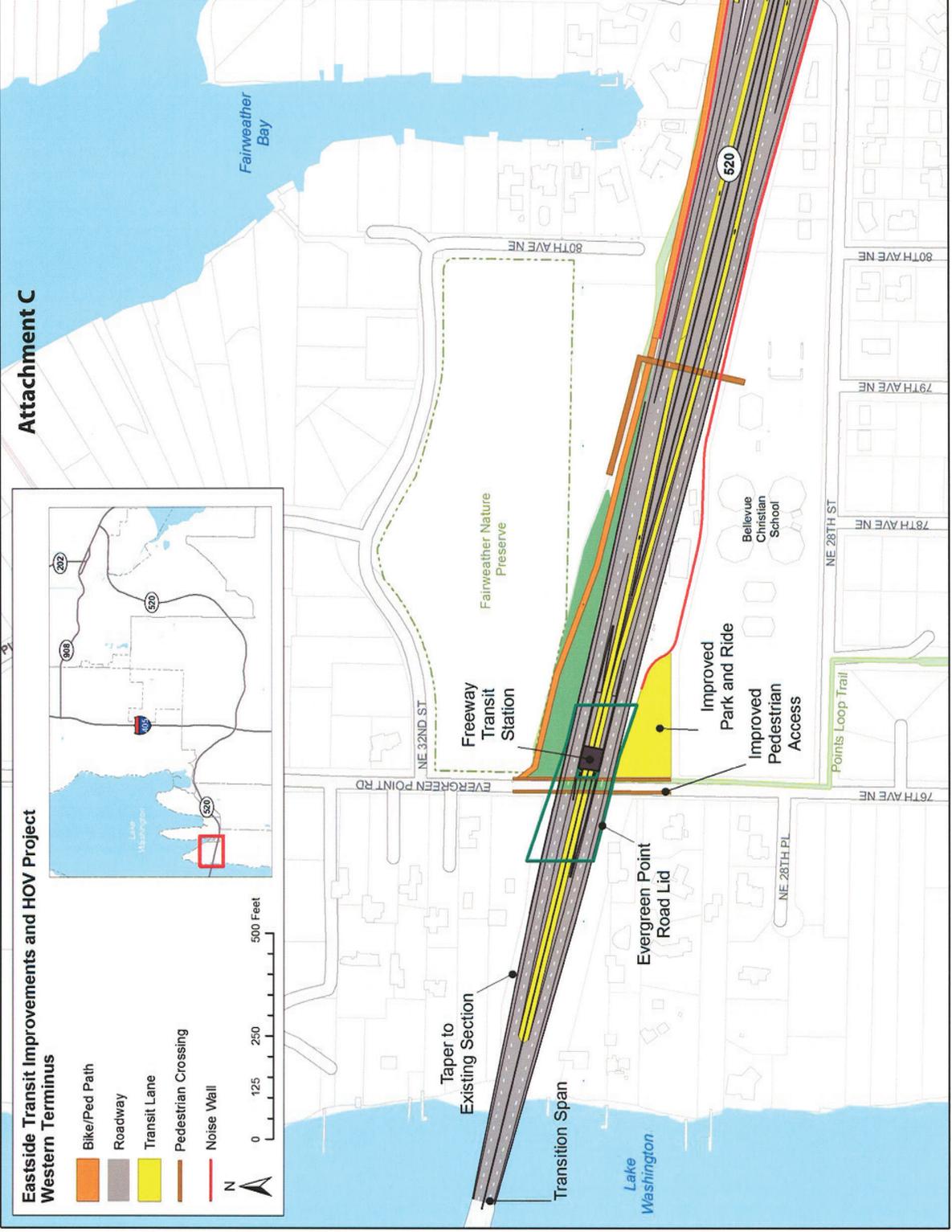
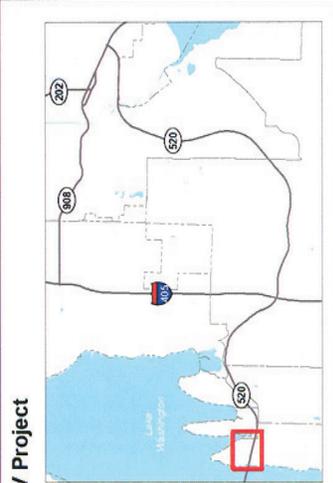
# Attachment B: Proposed SR 520 Eastside Transit and HOV Improvement Project



# Attachment C

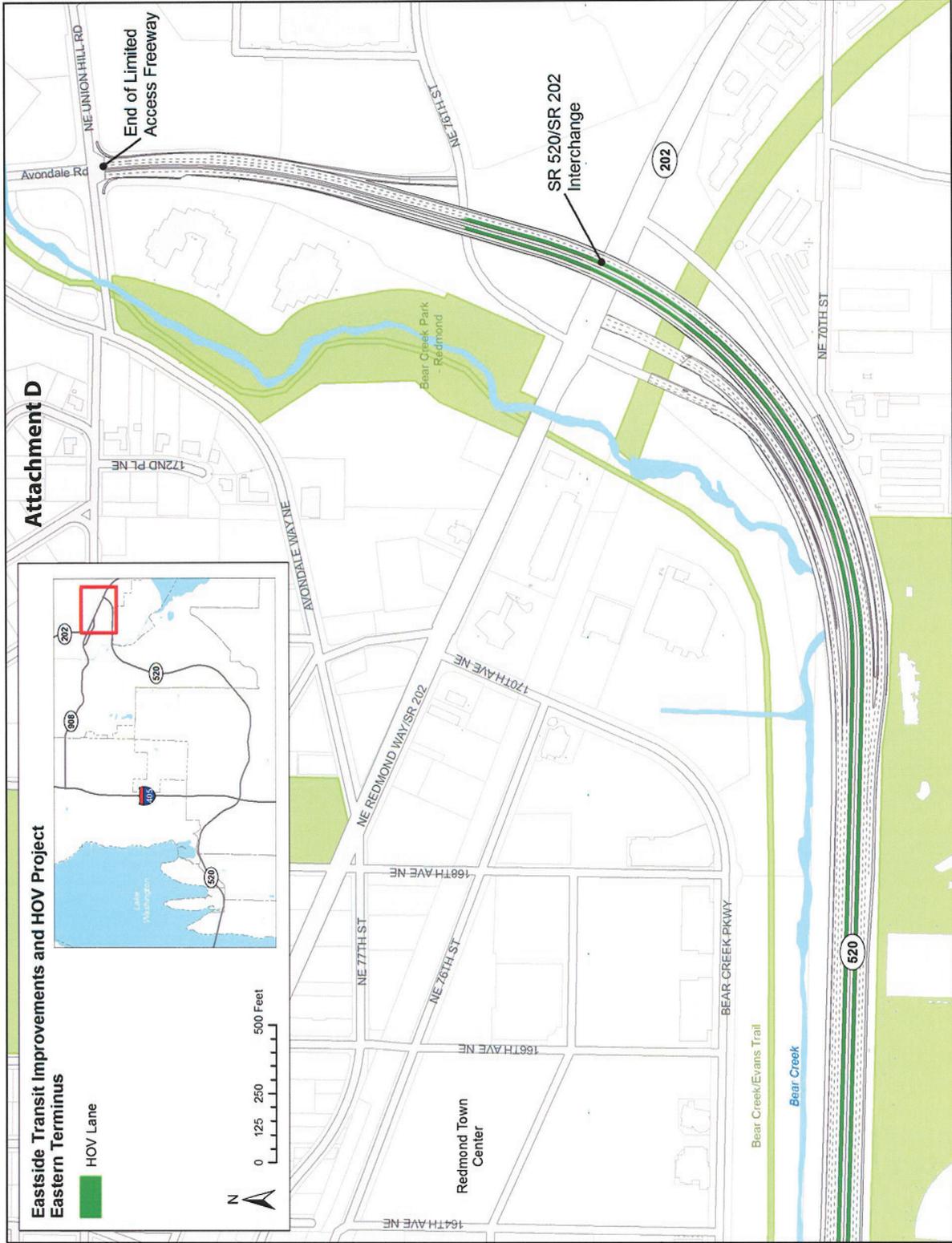
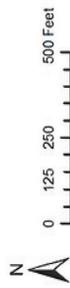
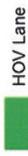
## Eastside Transit Improvements and HOV Project Western Terminus

-  Bike/Ped Path
-  Roadway
-  Transit Lane
-  Pedestrian Crossing
-  Noise Wall



# Attachment D

## Eastside Transit Improvements and HOV Project Eastern Terminus



End of Limited Access Freeway

SR 520/SR 202 Interchange

Bear Creek Park - Redmond

Redmond Town Center

Bear Creek/Evans Trail

Bear Creek

Avondale Rd

NE UNION HILL RD

NE 78TH ST

172ND PL NE

AVONDALE WAY NE

NE REDMOND WAY/SR 202

170TH AVE NE

NE 77TH ST

168TH AVE NE

NE 78TH ST

166TH AVE NE

BEAR CREEK PKWY

NE 70TH ST

202

520



# City of Seattle

Gregory J. Nickels, Mayor

## Seattle Department of Parks and Recreation

Kenneth R. Bounds, Superintendent

October 27, 2004

Paul W. Krueger  
Environmental Coordinator  
SR 520 Bridge Replacement and HOV Project  
Northwest Washington Division  
Urban Corridors Office  
401 2<sup>nd</sup> Avenue South – Suite 560, TB85-95  
Seattle, WA 98104-2887

### **Subject: Section 4 (f) Evaluation, SR 520 Bridge Replacement and HOV Project**

Dear Mr. Krueger:

As requested in your October 12 letter, the following comments are offered on the significance of Seattle park properties affected by the proposal:

#### **Bagley Viewpoint**

Bagley Viewpoint is one of the 62 squares, places and triangles that the Department of Parks and Recreation maintains at various locations throughout the city.

This viewpoint was originally established and named in honor of a pioneer homeopathic physician, Dr. Herman Beardsley Bagley. He came to Seattle in 1875, was active in civic affairs including service on the city council and as the City's health officer. He also specifically promoted development of the Lake Washington ship canal, which the viewpoint overlooks. His widow later donated an ornamental lamp and drinking fountain for installation at the viewpoint, then called Bagley Light Vista Point. The site provided a west entrance to Interlaken Park. In 1956 the lamp and fountain were damaged and removed, then replaced in 1970 with a commemorative plaque, a bench and plantings adjacent to the paved parking area. Construction of SR 520 in 1963 separated the viewpoint from the park

The 0.1 acre Bagley Viewpoint site offers views of Portage Bay, Lake Washington and the Cascade Mountains. Although it has a bench to accommodate viewers, the viewpoint's proximity to SR 520 and busy arterial streets makes it fairly noisy (average 75 dBA, per WSDOT's 10 October, 2004 *Draft Section 4(f)/6(f) Evaluation* for the SR 520 project). It is hardly the kind of place for seeking peace and solitude as part of a viewing experience. And yet the site has value, in providing people a place to pull off the road, park and enjoy a panoramic view of the Ship Canal and Portage Bay. The juxtaposition of these urban places with the expanse of Lake Washington and the Cascade Range beyond is engaging, especially for visitors in Seattle. Anecdotal observations indicate that occasional users of this viewpoint



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include tour bus companies that briefly park on the site's hard surface, unload passengers and describe these features for their mostly out-of-town clientele. The site offers good access from both I-5 and SR 520 for such visitors.

The view to the east has been diminished approximately 50% in recent years by the growth of vegetation up the slope on WSDOT and private property. Invasive weeds have recently been cleared at the top of the slope. Seattle Parks and Recreation's *Vegetation Management Plan for Seattle Parks Viewpoints* (March, 2004 Draft) notes that the next phase of work on this viewpoint will be tree removal and pruning, specifically the big leaf maples and alders. This will require a cooperative agreement with adjacent private parties and WSDOT, which owns downslope property. The *Vegetation Management Plan* is expected to be finalized late in 2004. When it is funded and carried out, Bagley Viewpoint's eastward view will once again be available.

Bagley Viewpoint is included in the Seattle Department of Design, Construction and Land Use - *Seattle Views: An Inventory of 86 Public View Sites Protected Under SEPA* (SMC 25.05.675), May, 2002, p. 10. The SEPA-protected designation means that the City Council may impose conditions on any physical development affecting those views. Inclusion on the SEPA-protected viewpoint list amounts to the City's reaffirmation that Bagley Viewpoint is significant, even though it is located in a noisy, busy area and is presently in need of vegetation management.

### **Montlake Playfield**

This is one of Seattle's 33 playfields, distributed throughout the City to provide space for field sports. The 27 acre site provides a children's play area east of the community center buildings, picnic tables, two lighted tennis courts, a soccer/football field encircled by a cinder running track, two softball fields and a 29-car parking lot. It also features pedestrian paths and trails, including some that are accessible for people with disabilities.

Montlake Playfield serves the northerly end of Capitol Hill, the west slopes of the Eastlake residential area, and of course the Montlake area eastward to the Arboretum. These boundaries are quite flexible and "porous" in nature, as people from other parts of the city also use Montlake's playfield, tennis courts, running track, and other facilities.

Scheduled and programmed activities provide a quantitative measure of the playfield's importance to the city and surrounding communities. Seattle Preparatory School (Seattle Prep) is a major user of Montlake Playfield for its athletic programs, including football, soccer, track, tennis and baseball. Other users include local youth baseball and soccer programs. The grass playfield surface has been compromised over the years by the high water table and poor drainage, but nevertheless absorbs heavy use. Seattle Prep has approached the City about making improvements to the site.

The tennis courts were among those lighted with Forward Thrust park improvement funds in the 1970's and are well used.

The aforementioned water table/drainage condition results from the playfield's location on a very low-lying site, which had until the 1920's been a dahlia flower nursery along the marshy south shoreline edge of Portage Bay. Vast amounts of fill materials from freeway and sewer construction projects over the years were added to the site to enable creation of the ballfields but the boggy shoreline edge has evolved into an important wildlife habitat. The wetland fringe of this site, and the submerged lands offshore, are valuable for more "passive" resource-oriented use than the actively-programmed athletic facilities. One of these passive uses is for canoe/kayak use on the surface water. Even though designated launch/retrieval facilities are not provided at Montlake Playfield, a number of such points are available along the Ship Canal in the near vicinity.

Some 6.8 acres of the original site are submerged lands in Portage Bay. The northern, shoreline edge of the playfield is a designated *Shoreline Critical Area*, and therefore falls within the City of Seattle's regulations for Environmentally Critical Areas (Seattle Municipal Code, Chapter 25.09). This shoreline was also included in a recent study entitled, *Seattle Shoreline Park Inventory and Habitat Assessment* (Anchor Environmental, L.L.C., for the Seattle Department of Parks and Recreation, April, 2003). The study assessed 18 Seattle parks on Lake Washington in terms of their suitability and relative priority for juvenile salmonid habitat restoration and conservation. The Montlake Playfield's shoreline was described as gentle slope, unarmored, silt/clay substrate, mixed vegetation with high cover. Relative to the other parks in the assessment, this shoreline did not rank highly in terms of habitat improvement potential, i.e. how much it could be improved for juvenile fish. The study noted that because habitat value is already quite good, that further restoration work would not be a high priority. It recommended only that non-native plants be removed and replaced with more native plantings, and that shoreline development be discouraged.

Montlake Playfield's shoreline and submerged lands are within the middle range visual resources seen from the SEPA-protected Montlake Playfield viewpoint. The documented viewpoint is from the community center facilities at the south edge of the playfield (see community center description below). Although the existing elevated SR 520 highway structure limits the extent of the view, it was considered valuable and significant enough to include in the limited list of viewpoints protected by Seattle's SEPA Ordinance. The City may impose protective conditions on new developments affecting such views.

The *Draft Vegetation Management Plan for Seattle Park Viewpoints* notes that only 10% of the intended views are currently visible due to the dense growth of native trees along the shoreline. Clusters of big leaf maples, alders, poplars and willows crowd the shoreline, while ivy and Himalayan blackberry dominate the understory. The plan calls for tree thinning to remove dead, dying and diseased trees, and those with poor structural form. Restoring of intended views is rated "high priority" due to the high degree of view obstruction. The plan notes further that "The extent of park use and the importance of the community center to the region has also been considered...."

WSDOT requests that Section 4(f) letters consider the significance of entire park properties and not just the portions directly affected by the SR 520 project alternatives. In that regard it is important to describe the Montlake Community Center facility that is located at the south

central end of Montlake Playfield. The playfield and a small brick field house, designed with Tudor Revival stylistic features, were developed at the same time and dedicated in 1935. The building was smaller than contemporary field houses but larger than the smaller “shelter houses” that were located in some communities at that time. A gymnasium building was added in 1977 to broaden the community center’s range of program capabilities. In 1998 a modular trailer building was added to the complex to provide a space focused on teen activities. The site development also includes an old 800 sq. ft. metal structure that provides space for pre-camp (3- to 5- year olds). The City’s 2004 Capital Improvement Program includes a further Montlake Community Center upgrade and expansion project, a \$2.9 million effort funded by the 2001 Pro Parks Levy, with construction anticipated by 2006.

Presently the Tudor Building offers pottery programs, distinctive enough that people from well outside the community enroll to take advantage of the instruction and facilities. The same 1,009 sq. ft. space also accommodates the main public meeting area, occasionally rented out for other events. It also is used for martial arts, yoga and other fitness programs, and in summer provides a space for the day camp program. The small Annex building accommodates children’s games and crafts, as well as pre-camp programs for 3-to 5-year old children. The gym accommodates basketball-related activities such as league games, practices and “free shoots”, and other activities such as adult aerobics. In inclement weather a portable children’s play area is operated by parents and care providers for small children. The modular building provides a Teen Room and a Game Room, and occasionally is the setting for community meetings.

### **Bill Dawson Trail**

The Bill Dawson Trail, also known as the Montlake Bike Path, passes under the SR 520 structure, connecting Montlake Playfield’s northeast corner with the Northwest Fisheries Center at the NOAA site north of the freeway. The trail is frequently used by pedestrians and bicyclists because it provides a critical link in the larger citywide path system, including Lake Washington Boulevard and the Arboretum Waterfront Trail to the east and south, the UW campus and Burke-Gilman trail system to the north and west. The trail provides an essential connection through a complex maze of traffic at the juncture of SR 520 and Montlake Boulevard. The *Seattle Bicycling Guide Map* (Seattle Engineering Dept., 1996) shows the Bill Dawson Trail route providing unique access southwest of the Montlake Bridge to the Montlake Neighborhood, bypassing the busy interchange area.

### **McCurdy Park**

The park was named in honor of Horace McCurdy who was an early benefactor to the Museum of History and Industry (MOHAI) and president of the firm that built the Evergreen Floating Bridge across Lake Washington. This 1.5-acre park immediately north of SR 520 is used, together with East Montlake Park, as the site for the MOHAI building which was constructed in 1952. That facility is a major repository of the City’s historic archival materials including photographs and other records, and it presents exhibits and programs related to those materials. A 499-seat auditorium on the ground floor is available for various public presentations and performances. Seattle Parks and Recreation owns and maintains the

MOHAI building, while programming and operation are handled by the MOHAI organization.

The McCurdy Park site also accommodates picnic tables where people can enjoy the landscaped park surroundings of the building, and the building itself which is a contributing element to the National Register of Historic Places-eligible Montlake historic district. People using those tables, or approaching the upper-level building entrance by a walkway from the parking lot, can enjoy the views afforded from there of Lake Washington to the northeast, and the marshes near Foster Island to the east. A vehicular overpass structure (East Park Drive East) bridges the SR 520 highway, connecting McCurdy and East Montlake Parks with Lake Washington Boulevard immediately to the south. That boulevard is part of Seattle's Olmsted system. McCurdy Park is also one of the City's SEPA-protected viewpoints, as defined earlier in this letter.

The *Draft Vegetation Management Plan for Seattle Park Viewpoints* notes that overgrown native alders and dense understory vegetation along the shoreline have diminished the park's water views to about 10% of the intended potential. The plan calls for thinning of the tree groves and removal of some trees, as well as invasive weeds.

The University of Washington owns some significant "collection trees" on the McCurdy Park site, catalogued and documented for research purposes. This supports the Arboretum's broader educational goals (described below in this letter), and adds to the beauty and value of the park surroundings near the MOHAI building.

### **East Montlake Park (including the Arboretum Waterfront Trail)**

The southernmost end of this 7.1-acre park, together with the adjacent McCurdy Park, provides part of the site for the MOHAI building described above. It also accommodates the 100 car capacity parking lot that supports the museum as well as the people who use the park's kayak/canoe launch and access the Waterfront Trail that connects to the Ship Canal, Foster Island, Marsh Island and the Washington Park Arboretum. On fall football weekends, the parking area is heavily used by football fans who park there, have tailgate parties, and walk over the bridge to Husky Stadium.

Seattle Parks and Recreation Department owns only the western third of the park, and the Arboretum Foundation has title to the eastern two-thirds. Despite this unusual ownership situation, the site is signed and used as a single public park. Like the Bagley Viewpoint, Montlake Playfield and McCurdy Park sites described above, East Montlake Park is also one of the City's SEPA-protected viewpoints. It provides panoramic views of Lake Washington and the Ship Canal at the Montlake Cut. It is readily accessible by Metro Transit as well as the trail connections that abound in the vicinity.

The aforementioned *Seattle Shoreline Park Inventory and Habitat Assessment* draft report characterized one of two shoreline reaches at East Montlake Park as having very high conservation value for juvenile salmonid habitat. The four parks assigned this very high conservation value were characterized as having "...unarmored, gently sloping shorelines,

with small or detritus-rich small substrates, large woody debris, and abundant cover provided by native vegetation. Within their respective parks, these reaches should be conserved to maintain their habitat value...”(page ES-3).

### **Washington Park Arboretum (including the Arboretum Waterfront Trail)**

Washington Park is one of Seattle’s oldest parks, and over the years has come to accommodate a broad range of recreational and scenic purposes as well as scientific and educational functions. The Arboretum located in the park contains a large, diverse collection of plants from around the world, including more than 10,000 individual plants representing over 4,400 species and cultivated varieties. Some 179 of these species are considered threatened or endangered. The Washington Park Arboretum also provides for extensive public access via a network of footpaths and roads that allow people to view the plants and enjoy the park’s peace and beauty. The trails, open spaces and surrounding waters are used for walking, jogging, bird-watching, picnicking, boating, fishing, formal and informal educational tours, weddings, and a variety of other activities and events. Finally, it should be noted that the Washington Park also provides an important civic staging area for major public gatherings, such as:

- Annual opening day of boating season, viewing of parade and crew races (early May)
- Annual Seattle to Portland bike ride, starting at the University, southward on Lake Washington Boulevard (July)
- Annual Seattle Marathon, traversing Lake Washington Boulevard through the park, and Interlaken Boulevard connecting with it.

**Visual Characteristics:** The Final EIS for the Washington Park Arboretum Master Plan (Seattle Dept. of Parks and Recreation, Jan. 2001, p.187 ff) describes the park’s visual character as follows:

“Visually, the Washington Park Arboretum is a large, wooded green space in the midst of urban residential neighborhoods...gently rolling hills that are dominated by plant collections and a backdrop of native forest species such as western red cedar and big-leaf maples. The dominance of these large native trees gives a unified theme to the park despite the wide variety of plant collections among them. Most areas of the park are well screened from the surrounding urban activity, providing visitors a relatively quiet atmosphere that is intruded upon only by traffic along Lake Washington Boulevard East, and by the noise and visual presence of SR 520 on Foster Island.

The Washington Park Arboretum has few buildings. The Graham Visitors Center, the principal visitor service facility in the arboretum, is its most modern building, constructed in 1985. Nearly all other built structures within the park were constructed between 1914 and 1942...These solid well built structures have aged nicely and contribute to the grace and distinction of the Washington Park Arboretum...

Foster Island, a peat and marsh landscape that was enlarged by the lowering of Lake Washington in 1917, occupies the southern shore of Union Bay and is a prominent and

unique landscape feature in the Washington Park Arboretum. The waterways surrounding the island consist of marshes and open water containing forms of vegetation that cannot be seen in the main portion of the park, providing habitat for a range of wildlife, particularly birds. The wood-chip trail leading to a meandering walkway on a series of floating piers and structures through the marsh gives the island a sense of remoteness and separateness from the rest of the park.

In contrast to the rest of the Washington Park Arboretum, Foster Island has been greatly altered by urban freeway construction. Although portions of the island have maintained a sense of wilderness, many areas are severely affected by the noise and visual intrusion of SR 520. The elevated freeway ramps dominate the landscape, and the freeway itself divides Foster Island in half, making passage to the north end of the island a less than calm experience through a narrow, dark pedestrian underpass....

On a citywide scale, the Washington Park Arboretum represents an important aesthetic element in Seattle's urban environment, providing visual relief that is part of a system of scenic routes and large open spaces envisioned in a park and boulevard plan commissioned by the city in 1904 and prepared by the Olmsted Brothers Landscape Architects. The visual character of the park was further influenced by the natural planting design and vegetation management philosophy of the 1936 *General Plan for the University of Washington Arboretum* (also prepared by the Olmsted Brothers firm), which are evident in the inviting and informal spatial character and elegantly flowing plant masses throughout the park....”

**Historical Origins and Resources:** The park's original 62 acres was obtained by donation in 1900. Soon after, the south end of the property was used for a playfield, harness racing and horseback riding on the “speedway” (an old logging road that is now Azalea Way), bicycling and walking on numerous logging roads and paths—many of which remain as footpaths today.

In 1904, the City hired the Olmsted Brothers to develop a comprehensive plan for Seattle's public park system. The plan featured a 20-mile landscaped boulevard system linking numerous existing and planned parks, greenbelts and playfields. Lake Washington Boulevard was among the first elements of the plan to be constructed. The boulevard served as the main entry to the Alaska Yukon Exposition in 1909. The Wilcox Footbridge over the boulevard (now a Seattle Landmark and on the National Register of Historic Places) was completed in 1914. It serves as the primary pedestrian entry into the park from the adjacent Montlake neighborhood.

With additional land acquisitions, including Foster Island, Washington Park grew to its present size by 1934. In that year, the City of Seattle and the University of Washington established the Washington Park Arboretum, and the first plantings were designed in that year by James F. Dawson of the Olmsted firm. In the following year the Olmsted firm was commissioned to prepare a plan to guide subsequent arboretum planning. Between 1936 and 1941, the federal Works Progress Administration carried out basic construction, including prominent Arboretum features such as Azalea Way, the rock garden, the stone bridge at the

Pinetum west of the boulevard, most of the trail system, and the stone cottage at the south entrance.

According to the history recounted in the previously cited Final EIS for the Washington Park Arboretum Master Plan ( p. 160), most of the existing plant collections were established after World War II, when the facility was developing into a major regional, national and international resource. The Japanese Garden, developed in 1960, was one of the achievements of this postwar period. Located immediately westerly of a fence that visually screens it from Lake Washington Boulevard, the garden symbolizes international friendship and cooperation, featuring stone lanterns, pools, plantings and a teahouse.

Lake Washington Boulevard runs through the entire length of the park, connecting the Olmsted-planned boulevard from the south end of Seattle's lakefront northward past the University to Ravenna Boulevard and Green Lake. The continuity and design details of the one-mile segment through the Arboretum continue to be critically important to the cohesiveness of the entire historic boulevard system. As the previously-cited Final EIS document points out (page 172), the existing boulevard is laid out more or less according to the 1904 Olmsted Brothers' plan, except at the north end where it was supposed to connect to Lakeside Boulevard. The subsequently-constructed SR 520 ramp structures and their associated traffic have had a large impact on the appearance and use of the boulevard.

**Current Management and Planning Guidelines:** Since 1934, the Seattle Department of Parks and Recreation has owned and maintained the 230-acre Washington Park Arboretum. The University of Washington owns and manages its plant collections. The multiple roles of the Arboretum were summarized in a recent document as follows:

”...The Arboretum is valued not only as a world-renowned collection of valuable trees and shrubs, but also as part of Seattle's natural environment and its history as well...a broad range of differing visions for the Washington Park Arboretum. At one end of the spectrum, the Arboretum and Botanical Garden Committee has emphasized the citywide and regional value of the educational and scientific functions of the arboretum and its potential as a prominent public garden. This management objective is based on the various resolutions and mission statements that have been adopted ...through the years by both the city and the university. At the other end of the spectrum, some everyday users of the park emphasize its long-standing function as a neighborhood, city and regional open space resource...[These] park users value its aesthetic and recreational qualities, apart from its value as a plant collection... [The] proposed master plan is intended to provide a balance among these differing visions....” (Seattle Dept. of Parks and Recreation, Final EIS for the Arboretum Master Plan, Jan. 2001, p.15}

The 2001 Master Plan best describes the Washington Park Arboretum's role in meeting community objectives. The “community” it serves is diverse and complex, so the plan for this 230-acre public open space is guided by multiple goals. Those most pertinent to the SR 520 project are highlighted below:

**Education:** ...serve K-12 students, higher education, families, landscape professionals, natural history/ecology enthusiasts, gardeners, special needs populations, and general visitors....

**Conservation:** ...Healthy, thriving plant collections and exhibits throughout the Washington Park Arboretum... a sanctuary for diverse urban wildlife... Rehabilitation of historic planting sites, physical amenities, and Olmstedian influences.

**Recreation and Visitor Services:** Non-structured recreational use of Washington Park consistent with the Arboretum's mission of education, display and conservation... Decreased disruption of park and arboretum use by arterial traffic on Lake Washington Boulevard and entering/exiting State Route 520... Improved pedestrian and bicycle access to Washington Park... Enhancement of the ambiance and visitor experience at the Japanese Garden...

The above goal of decreasing park and arboretum disruption by Lake Washington Boulevard traffic entering and leaving SR 520 was further detailed in an Objective # 26:

“Work with appropriate agencies to reorient arterial traffic conduits at the north end of the Washington Park Arboretum and reduce speed of traffic on Lake Washington Boulevard so traffic moves logically between Lake Washington Boulevard and SR-520, with minimum disruption to the Arboretum....

The master plan includes the following features at the north end of the Park, closest to SR 520:

- Convert unused freeway ramps into a pedestrian and bicycle access to MOHAI area...
- Complete Foster Island Loop Trail...better opportunities for bird watching...
- Waterfowl and scenic viewing platform alongside Duck Bay...
- Daylighting of Arboretum Creek (near present SR 520 ramps intersection with LWB)...
- Restoration of Duck Bay...better opportunities for bird-watching and wetland appreciation...
- A multi-purpose outdoor shelter along the Foster Island Loop Trail...

**Viewpoint Resources:** Washington Park is another of the City's 86 public view sites protected under Seattle's SEPA ordinance. Several viewpoints within the park provide panoramic views of Lake Washington, the Ship Canal, and the Cascades. Amenities supporting the viewpoint function include seating areas, ADA accessibility, an elevated viewing platform, signage, parking and Metro bus service within walking distance of these views.

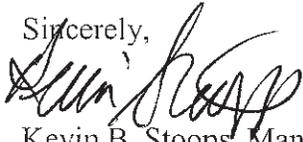
**Wildlife Habitat:** The *Seattle Environmentally Critical areas Folio* identifies the wetlands associated with Foster Island and Lake Washington, while the remaining upland portions of the Washington Park Arboretum are mapped as critical fish and wildlife habitat (1992). Seattle's Environmentally Critical Area Regulations (Seattle Municipal Code 25.09) classify the western portion of the park as fish and wildlife habitat area. There is an eagle nest within

the park boundaries, although the eagles may periodically nest elsewhere in the vicinity. The Washington Park Arboretum's shoreline, including Foster Island, is quite extensive and varied in nature, so the previously-cited *Seattle Shoreline Park Inventory and Habitat Assessment* divided the shoreline into 10 different reaches. Those in the Duck Bay area generally were characterized by steep, unarmored slopes, with high restoration priority ratings. The report noted restoration projects already planned there (see *Arboretum Shoreline and Trail Improvements* project described below).

The park's Duck Bay shoreline is being improved as par the current Arboretum Shoreline and Trail Improvements project, financed by the Shoreline Park Improvement Fund. In 1999 the Seattle City Council authorized this project in lieu of the previously proposed Arboretum Lakeside Trail. According to the Executive Summary in the master plan for this area, it suffers from "...overuse, inaccessible pathways, eroded landscapes, intrusion of exotic plants and reduced native habitats. Extensive trampling together with the artificial raising and lowering of the lake has created a very denuded and eroded shoreline...Improvements to this area have the opportunity to greatly improve the native habitats and visitor experience...." The current project includes shoreline trail improvements and replacement of the pedestrian bridge to Foster Island, habitat; Control and improvement of public access to the water, and revegetation of the eroded shore with native plants and woody habitat structures.

I hope that the above narrative, will sufficiently describe the significance of Seattle's park properties most directly affected by the SR 520 Bridge Replacement and HOV Project. If you have further questions, please feel free to contact me at 684-7053 or Peter Marshall at 684-7048.

Sincerely,



Kevin B. Stoops, Manager  
Major Projects and Planning

cc: Kenneth R. Bounds  
Erin Devoto  
Peter Marshall  
Donald Harris  
Terry Dunning  
David Allen, SDOT



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October 12, 2004

Kevin Stoops  
Senior Planner, Major Projects and Planning  
Seattle Parks and Recreation  
800 Maynard Ave. S., 3rd Floor  
Seattle, WA 98134-1336

Dear Kevin Stoops:

As part of the SR 520 Bridge Replacement and HOV Project, WSDOT has evaluated the potential effects of the project on public parks and recreational facilities. In addition, WSDOT has worked with the Federal Highway Administration to prepare a Section 4(f) Evaluation that describes the effect of the project on these facilities. The Section 4(f) Evaluation is a requirement of the U.S. Department of Transportation Act of 1966. The Act requires that proponents of federally funded transportation projects (such as the SR 520 Bridge Replacement and HOV Project) evaluate the effect of their project on parklands, as well as evaluate feasible and prudent avoidance alternatives and measures to minimize harm to parklands.

We request that you, as a local public official with jurisdiction over affected park and recreational facilities, provide formal comment on the significance of those facilities. In the context of Section 4(f), significance means that in comparing the availability and function of the recreation, park, or wildlife and waterfowl refuge area with the recreational, park, and refuge objectives of that community, the land in question plays an important role in meeting those objectives. Your significance determination must consider the significance of the entire property and not just the portion of the property that may be affected by the project.

The SR 520 Bridge Replacement and HOV Project Section 4(f) Evaluation has identified the following facilities within your jurisdiction that would potentially experience direct and/or proximity effects:

- Bagley Viewpoint
- Montlake Playfield
- Submerged land in Portage Bay near Montlake Playfield
- Bill Dawson Trail
- McCurdy Park
- East Montlake Park (including the Arboretum Waterfront Trail)

- Washington Park Arboretum (including the Arboretum Waterfront Trail)

In accordance with Section 4(f) requirements, we request that you provide formal comments on the facilities included in the list above. Your input will become part of the official record of the SR 520 Bridge Replacement and HOV Project EIS and Section 4(f) process and will be included in the Section 4(f) Evaluation.

We ask that you respond to this request no later than October 25. Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "Paul Krueger". The signature is written in black ink and is positioned above the typed name.

Paul W. Krueger  
Environmental Coordinator  
SR 520 Bridge Replacement and HOV Project