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

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

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.
• 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.

  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.

  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.

  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.

• 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.

• 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.
- 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 compensation 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 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.

- **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.
- 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.

- 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.

- **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
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.

- 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.
April 7, 2010

Stephanie Brown
Seattle Department of Transportation
Major Projects
POB 34996
Seattle, WA 98124-4996

RE: SR 520, I-5 to Medina: Bridge Replacement and HOV Project Supplemental Draft Environmental Impact Statement

Dear Stephanie,

This letter contains the comments from the Seattle Fire Department on the SR 520, I-5 to Medina Bridge Replacement and HOV Project Supplemental Draft Environmental Impact Statement.

The purpose of this letter is to highlight the Department’s primary life safety concerns associated with the project design.

1. **Lids and Tunnels:** These facilities will need to meet Fire Code requirements for life safety systems.

2. **Overwater Structures:** The height of the west transition span between Foster Island and the floating bridge must meet clearance requirements for Seattle Fire Department boats. The navigation channel must align with the bridge clearance and the anchoring system for the floating portion of the bridge must not interfere with the navigation channel under the west transition span.

3. **Fire Department Facilities:** Changes to the intersection of 10th Avenue and Roanoke Street will negatively impact fire Station 22 by taking property from the front of the station and removing space for planned expansion to the east of the station.

Thank you for requesting input from the Seattle Fire Department. If you have questions or need further information related to the Department’s comments, please contact Gary English at 206-386-1450 or email to gary.english@seattle.gov.

Very truly yours,

[Signature]

Assistant Chief John H. Nelsen
Fire Marshal

JHN:GLE:pd
MEMORANDUM

Date: April 15, 2010
To: Carl Marquardt, Mayor’s Office
From: Diane M. Sugimura, Director
Subject: DPD Comments on SR 520 SDEIS

General Comments

These comments apply to the entire document, including Chapter 5 (summary of impacts) and the various discipline reports.

Please state what permits will be sought from the City, including whether a Shoreline Substantial Development Permit will be sought.

The City assumes that it will adopt the State’s environmental documents, and on the basis of those adopted documents, exercise the City’s substantive SEPA authority. SMC 25.05.630 identifies the need for independent review before the City can appropriately adopt the State’s environmental documents. “An agency adopting an existing environmental document must independently review the content of the document and determine that it meets the adopting agency’s environmental review standards and needs for the proposal.”

State of Washington statutes and WACs and the City’s SEPA ordinance all require that the project’s impacts and proposed mitigations be clearly identified. For example, RCW 43.21C.060 calls for identification of “specific adverse environmental impacts...identified in the environmental documents” (with respect to conditioning) and “significant adverse impacts identified...in an EIS” (with respect to denial).

SMC 25.05.440 (E), Affected Environment, provides: “This section of the EIS shall describe the existing environment that will be affected by the proposal, analyze significant impacts of alternatives including the proposed action, and discuss reasonable mitigation measures that would significantly mitigate these impacts.” Similarly, with respect to proposed mitigation, SMC 25.05.660 (A)(2) provides that “mitigation measures shall be related to specific, adverse environmental impacts clearly identified in an environmental document...”

WSDOT’s Environmental Procedures Manual also calls for this clear identification. For example, “The environmental document must discuss impacts on both the natural…and built…environment. The EIS must also discuss unavoidable adverse impacts.” (WSDOT EPM
M31-11.06, Page 411-11). Similarly, with respect to discipline reports: “A discipline report provides evidence that all potentially significant impacts have been considered, presents information to support any findings regarding the significance of any impacts, and demonstrates clearly that the report complies with the requirements of environmental law.”

Based on DPD’s review of the document, there is ample room to improve the clarity: (1) are all impacts identified and described as such, (2) are these impacts characterized as adverse, and (3) are these impacts characterized as either above or below the level of significance. Finally, if mitigations are being proposed, they should be clearly identified as such.

The following examples are based on the Visual Quality section of Chapter 5, but also apply to other aspects of the environment described in the entire document.

When Visual Quality is discussed (page 5-168), it is stated that “all options would result in changes to the visual character and quality in the Montlake area….Option K and L would include additional structures….These structures would dominate views much more than the existing ramps and main line.”

It is not clear whether these changes are impacts, and if so, whether they are significant adverse impacts or not. When new structures “dominate views much more” -this suggests an impact, but again, no indication is given by the author as to whether it is significant or not.

Page 5-68 states that the effects of Option A “…would result in high levels of change to the visual character of the landscape from the viewpoint of commuters and adjacent residents.” Page 5-69 states that some aspects of Option K, e.g., the retaining walls for the tunnel entrance will “be visible to commuters and park users, with the highest level of visual effects on views from the Arboretum Trail at Marsh Island and the UW WAC. From these sensitive locations, the structures would dominate views much more than the existing ramps and main line do.”

On Page 5-70 the document provides that “Option K would also result in very high levels of change to visual character and quality in the southeast campus of the University of Washington.” Similarly, also on Page 5-70, with respect to Option L: “The walls and elevated interchange would also dramatically change the character and quality of views from the Arboretum Trail at Marsh Island and the WAC. From these sensitive locations, the structures would dominate views much more than the existing ramps and main line do.”

After these sentences, on Page 5-71, a reference is made to “visual impacts”. “Adding northbound capacity on Montlake Boulevard to Option L would result in no measurable differences in the visual impacts described above.”

From this reference, it appears that the above examples, and others, have been descriptions of “impacts.” Please confirm that each example is or is not an “impact,” whether it is adverse or not, and whether it is significant or not.

Although the visual quality section is cited for this example, the same request is made for each other section of the document and the various sections summarized in Chapter 5. When an effect of the
environment is described, please state whether or not the effect is or is not an “impact,” whether it is adverse or not, and whether it is significant or not.

Visual Quality Comments

As stated in general comments, impacts and their characterization as adverse and/or significant need to be clearly identified, as do proposed mitigations.

The Discipline Report does not appear to follow WSDOT’s Environmental Procedures Manual (EPM). The EPM requires that “the Visual Impacts Discipline Report...must include a qualitative and quantitative analysis of all significant views from and toward the facility throughout the project length.” The report does not currently include a quantitative analysis. In response to a July 2009 City comment on the consistency between the numerical rating and the text, the response was:

“The matrix included with this version of the document has been deleted because of its inherent (internal) inconsistencies. A summary table has replaced the matrix because it offers more information as well as a composite evaluation of the whole landscape unit.”

As a methodological comment, it would be clearest to the reviewers if the quantitative analysis, when it is replaced, is indicated throughout the narrative text, as well as in an appendix. For example, if, in the narrative, the change in visual quality for a particular landscape unit or SEPA-protected viewpoint is discussed, the numerical tabulation should be included at that point so that the qualitative and quantitative descriptions of change can be compared and correlated.

The numerical analysis is particularly important in identifying whether an impact is adverse or not and significant or not. It would be helpful to identify what level of numerical change in visual quality equates to a impact, equates to an “adverse” impact and equates to a “significant” impact. Although the EPM identifies a change of 1.0 or greater as equating to a “significant” impact, the City’s SEPA substantive authority encompasses conditioning impacts that are less than significant. (See RCW 43.21C.060 cited in general comments.) Therefore, a numerical rating that corresponds to impacts, even if they are not significant, is necessary, and would be helpful in understanding how the scale of impacts was assessed in the Report.

At 25.05.675 (P) and Attachment 1 to Chapter 25.05, the City’s SEPA ordinance lists specific views of the mountains, water, skyline, etc. and the viewpoints from which these views are protected. Impacts on these specific views should be clearly identified as described above. Although these views are indicated on page 28 of the Visual Quality Discipline Report and are included in the landscape units chosen, the Report should show a table of the affected SEPA-protected views with a clear statement of any impacts on those specific views. This is in addition to the overall assessment of impacts to the landscape units.

Much of the project will take place in the City’s designated shoreline environments. The City identifies protected view corridors in most of its shoreline environments (SMC 23.60 et seq). Only the Conservancy Navigation and Conservancy Protection environments do not include view corridor protections. These views are also clearly protected in the City’s Comprehensive Plan.
(Shoreline area objectives). Please identify any impacts, including whether these are adverse and/or significant, to view corridors in the City’s shoreline environments.

**Land Use Comments**

(Chapter 5, page 5-38) When parking and moorage are replaced for the Seattle Yacht Club and the Queen City Yacht Club, respectively, this may require shoreline variances as the clubs are nonconforming uses and the parking and moorage could expand those nonconforming uses. Private clubs are considered institutions, and institutions are prohibited in the CM and CN shoreline environments. Expansion of a non-conforming use is a land use impact and should be specifically identified.

On page 5-45 is Exhibit 5.3-1. In this exhibit is one aerial photo look east/northeast, and 3 diagrams. For the three diagrams, please clarify if all of them are oriented with north at the top. This appears to be the case, but it could be clarified with north arrows.

**Shoreline Comments**

**pp.4-14-15 and pp. 5.42.3:** Discussion should include the fact that City of Seattle’s Environmental Critical Areas ordinance (SMC 25.09) also applies to this project area, in addition to shoreline regulations (SMC 23.60).

**p. 5.131:** This discussion of impacts of overwater structures on fish should include specific discussion about the increased risk of predation on juvenile salmon associated with overwater structures, including providing habitat for known predators for salmon in Lake Washington. This document does vaguely mention this impact on p. 5-131 (third paragraph from the bottom) and speaks about how fish may avoid shaded areas and that their migration could be delayed, but this discussion should be more explicit about the increased risk of predation associated not only with in-water structures (as mentioned on p. 5-132) but also overwater structures and shaded areas.

**p. 5-135:** The discussion of the fish tracking study results should mention that this study was focused on migration impacts (e.g., delay, behavior) and not predation and predation risks and that other relevant research is available regarding salmon migration in this area, including predation impacts, with a prime example being the Synthesis of Salmon Research and Monitoring: Investigations Conducted in the Western Lake Washington Basin (SPU, ACOE 2008).

**pp.5-140-1:** This section should also specifically address the potential ecological impacts and mitigation measures associated with the increase in impervious surfaces associated with each of the alternatives, particularly in areas within 200 feet of ordinary high water (subject to City’s shoreline code and the general development standards in SMC 23.60.152) and within 100 feet of ordinary high water (per SMC 25.09.200). This discussion should include calculations for existing and proposed impervious surface in the project area within 100 feet of ordinary high water. Under the City’s ECA code (SMC 25.09.200 B 4), any increase in impervious surface and/or vegetation removal within 100 feet of ordinary high water (the ECA shoreline habitat buffer) potentially triggers mitigation for impacts to shoreline ecological functions, which is separate from wetland impacts and stormwater management.
p. 5-143:
The discussion about what has been done to avoid or minimize impacts on this page should include more specific discussion about the proposed height of the bridge in the western approach over open water and over wetlands and what has been done in order to elevate the bridge alternatives as much as feasible to avoid or minimize shading impacts, per previous discussion in the document about the acknowledged ecological impacts associated with bridge height (e.g., p. 5-132) and shading.

pp. 7-35-36:
The conclusion stated that “On the basis of a recent fish tracking study..., these effects are expected to be minor” should include a number of caveats about the limitations of that study (cited previously in the document; and mentioned in comments above regarding p. 5-135) and the fact that there is considerable research about the negative effects of overwater and in-water structures and shading in the near shore environment on juvenile salmon, including increased risk of predation. This one tracking study is not sufficient to make this statement regarding the cumulative effects of this entire project, including construction, on fish resources. Again, there is a whole body of research that is relevant here, including the Synthesis of Salmon Research and Monitoring: Investigations Conducted in the Western Lake Washington Basin (SPU, ACOE 2008), as well as salmon recovery plans for WRIA 8 and associated research.

pp. 7-36: The argument presented here about the relatively small fraction of fish habitat area impacted by this project compared to the total habitat available for the potentially affected species is weak and does not cite any relevant research or scientific support for this analysis. Each life history stage is critical for salmonid survival and this project area does contain critical habitat for specific life stages such as juvenile rearing and out-migration functions as well as adult life stages. So destruction, removal or damage to this habitat and associated ecological functions could indeed have significant impacts on salmon using this area, particularly those stocks with relatively low numbers such as Cedar River Chinook, regardless of the relative size of this area compared to the area utilized over the entire salmonid life cycle.
City of Seattle
Department of Transportation

Thank you for the opportunity to comment on the SR 520 Bridge Replacement and HOV Project Supplemental Draft Environmental Impact Statement (SDEIS). SDOT’s interests and concerns on this project fall into the areas of permitting, managing traffic, multi-modal access, and traffic modeling.

Permitting
SDOT’s primary role on this project relates to the issuance of street use permits. All closures within City of Seattle street right-of-way will require a street use permit. Please consult with SDOT early to reduce conflicts between proposed closures related to this project and other projects in the area (e.g., 45th Street Viaduct replacement, U-Link station construction). When developing your permit applications, please consider the following:

- City of Seattle streets and state routes that act as city streets (like Montlake Boulevard) must be designed to the standards set forth in the City of Seattle Right-of-Way Improvements Manual.
- Designated haul routes for the project must be approved as part of the street use permitting process.

Managing Traffic
The use of active traffic management (ATM) and transportation demand management (TDM) can help manage congestion in the project area. Specific comments are listed below:

- Develop a comprehensive intelligent transportation system (ITS) program for Montlake Boulevard and 23rd Avenue. Key features of this program should be dynamic message signs, signal system upgrades, emergency vehicle preemptions, and live travel time information.
- Implement a traffic management plan (TMP) for Lake Washington Boulevard that includes traffic calming measures, improved pedestrian crossings, etc.
- Utilize TDM tools to reduce vehicle miles traveled (VMT) in an effort to meet the state mandated reduction targets.
- Dedicate a portion of the tolling revenue to transit to ensure high-quality transit service across the corridor.

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An equal opportunity employer. Accommodations for people with disabilities provided upon request.
Multi-Modal Access
The project should improve the bicycle and pedestrian environments near the corridor and consider priority treatments for transit in the project area to ensure a socially equitable outcome. Specifically, the project should:

- Ensure connectivity between the new regional bicycle path on SR 520, the Burke Gilman Trail, and the nearby designated City of Seattle bicycle routes. All newly designed bicycle routes should be designed to City of Seattle standards.
- Improve pedestrian safety in the interchange area around SR 520 and Montlake Boulevard by reducing crossing distances and providing state-of-the-practice pedestrian treatments.
- Add transit priority treatments, such as queue jumps and bus-only lanes, to help both local and regional transit in the project area.

Traffic Modeling for City Streets
The current level of traffic modeling for City of Seattle streets, as presented in the SDEIS, should be updated prior to final design. SDOT requests a fully calibrated VISSIM-like model for Montlake Boulevard, Pacific Street, 23rd Avenue, and Lake Washington Boulevard. Given the complexity of the city street network and the tendency for queue back-ups through several intersections, the existing SYNCHRO analysis is insufficient.
InterOffice Memo

To:        Mayor Michael McGinn
From:      Michael Killoren
Date:      April 14, 2010
Subject:   Comments for the SR 520 SDEIS

The Office of Arts & Cultural Affairs and the Seattle Arts Commission expresses its strong recommendation to prioritize the urban framework and urban space in the design and planning of the elements of the State Route 520 expansion. We urge all parties to consider the impacts these projects will have on the urban fabric, and encourage its project designers to provide thoughtful, appropriately scaled placemaking strategies and innovative design. We hope that the projects will include the thinking of artists in the state-funded components.

The SR 520 expansion that occurs within the city of Seattle should express the highest level of design excellence and green development befitting the city’s status as an international city. We recommend that the same requirements expected of projects funded by the city of Seattle be applied to the SR 520 expansion. These include strict adherence to the recommendations of the Seattle Design Commission as well as accommodation of percent-for-art requirements. Artist involvement on the design teams for these projects is essential and should be mandated outside of the percent-for-art legislation at the state level.

We encourage your commitment to design that incorporates principles of human-scale placemaking, environmental stewardship, coherent approach to future expansion, clear expression of function, sophisticated design and incorporation of artistic thinking.

Please consider us, and the Seattle Design Commission, as your resource for guidance of these design processes. We have experience managing large scale, high profile transportation projects, and would welcome the opportunity incorporate art and the ideas of artists into the design and construction of the SR 520 expansion.