



February 22, 2022

TO: Mayor Dana Ralph
Chair of the Transportation Policy Board
Puget Sound Regional Council

RE: Comment on the Draft Regional Transportation Plan

Dear Mayor Ralph,

We are Lid I-5, a volunteer community group working to reconnect communities and expand public land. Lidding urban freeways has emerged as a national best practice, with nearly 100 projects completed and planned. Locally, since 2015 we have engaged with thousands of people, raised media awareness, and received endorsements by elected leaders.

In 2020, the City of Seattle published the [I-5 Lid Feasibility Study](#) which found a lid over Interstate 5 in central Seattle up to 17 acres in size is both feasible and worthwhile for its significant public benefits. Due to the project location at the region's most intensively traveled freeway segment and the potential for regional social and economic benefits, we are requesting the project to be elevated within the 2022-2050 Regional Transportation Plan. Our recommendations are listed on the following pages.



Figure 1 - Conceptual renderings of what lidding I-5 could look like in Central Seattle with a mix of parks and development

Lidding I-5 is a win-win project that addresses several regional issues at once:

- **Rebalancing the regional inequities of current freeway lids**, which are primarily in affluent and low-density neighborhoods (see Figure 2). A 2018 University of California [research study](#) determined that freeway lids located in Central Seattle are more equitable than others in King County due to the greater benefits to people of diverse race and ethnicity and the prevalence of lower and more mixed incomes. As of 2020, in the Central Seattle neighborhoods bordering I-5 the population is 45% people of color, 82% of households are renters, and the median income is 25% less than Seattle as a whole.

- **Improved regional through-traffic** with the potential removal or relocation of ramps in Central Seattle. Some ramps are too closely spaced or have other obsolete designs that cause congestion, unsafe merging, and pedestrian safety conflicts. WSDOT leadership has indicated openness to ramp changes for the benefits of through-traffic. Further, a supermajority of 77% of Seattle voters support relocating some of the I-5 ramps if this were determined to be feasible for improving traffic congestion and safety issues.
- **Improved multimodal connectivity by reconnecting the street grid.** Nine of eighteen streets in the area remain broken off by I-5, and reconnecting them will encourage more walking, biking, and transit use, including connections to the future Sound Transit light rail stations at Midtown and Westlake.
- **Revitalizing the post-pandemic economy of Downtown Seattle** with opportunities for new residential development (including affordable housing), new small business and entertainment spaces, and improving the environment for existing uses. The lid project could have annual economic impacts of \$1-3 billion per year (direct and indirect) depending on the amount of real estate activity on the lid.
- **Encouraging urban, carbon-light living** by adding important family-friendly amenities like parks, schools, and community centers that attract and support people living in dense, transit-oriented neighborhoods.
- **Improved air and water quality** by reducing the local urban heat island effect 3-4 degrees and potentially treating up to 30% of local stormwater runoff before it reaches marine waters.
- **Sparking discussion on maintaining and preserving central I-5**, which is known to be past the end of its expected service life, seismically vulnerable, and inadequately configured for today's transit and freight transportation needs. A supermajority of 82% of Seattle voters are concerned about the capability of I-5 to survive a major earthquake in Seattle and be available for emergency use.

The project has support at the state level. In the current 2022 session, the Washington State Legislature has dedicated funding for a Central Seattle I-5 lid this year under the proposed supplemental budget ([PSSB 5689](#), Program T and section 219.9). The proposed \$2.5 million in funding also includes an I-5 planning and environmental linkage study as a precursor to a statewide I-5 master plan.

Locally, lidding I-5 is supported by Seattle policies:

- **Seattle Comprehensive Plan Transportation Policy 3.11** – *Look for opportunities to reestablish or improve connections across I-5 by creating new crossings, or enhancing streets where I-5 crosses overhead, or constructing lids, especially where these can also enhance opportunities for development or open space.*
- **Seattle Comprehensive Plan Parks Policy 1.17** – *Create innovative opportunities to use existing public land, especially in the right of way, for open space and recreation, including street plazas, pavement to parks, parklets, lidding of reservoirs and highways, and community gardens.*
- **[Seattle Imagine Greater Downtown](#), big idea “Stitch the I-5 Divide”**, which reads: *Reconnect neighborhoods and improve access over, under, and across I-5: Increase open space over I-5; Implement a Melrose Promenade 2.0; Bring light and purpose to the spaces under I-5; Connect north neighborhoods with a Thomas St bridge and overlook; Enhance the Harborview overlook; Rethink freeway entrances and exits downtown*

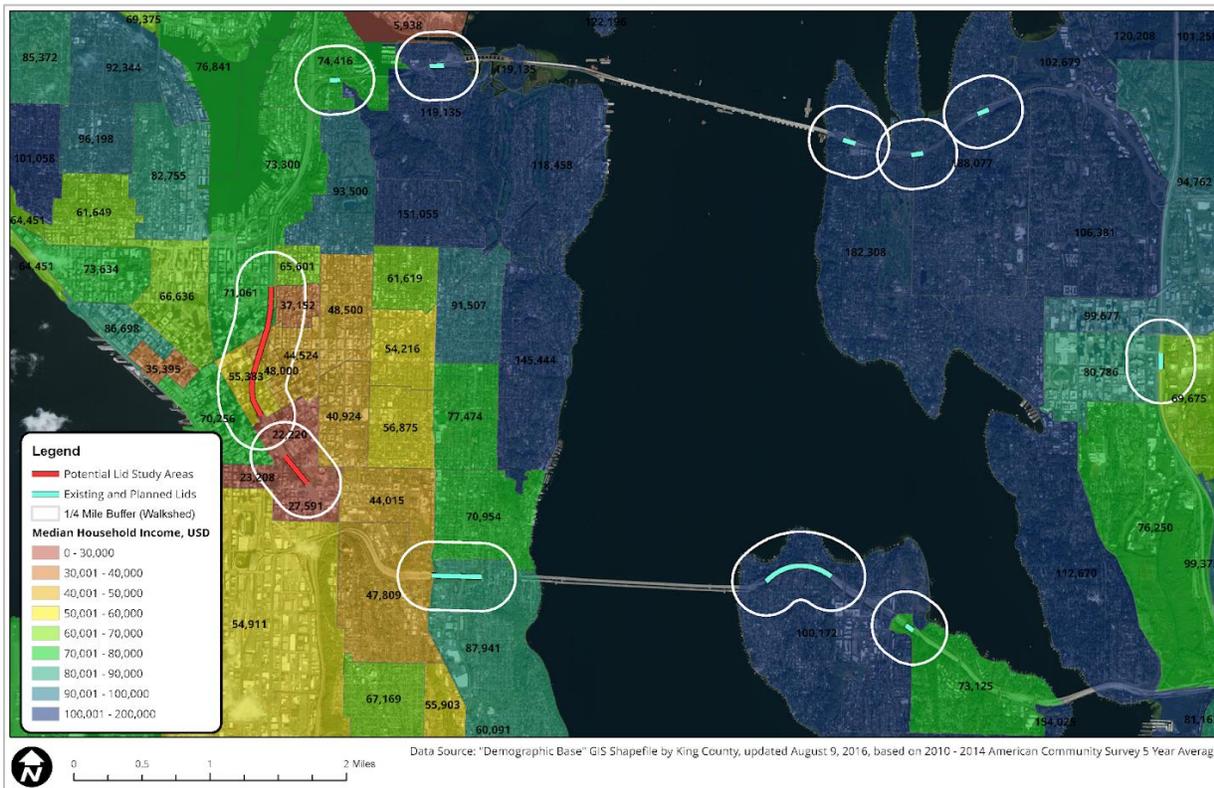


Figure 2 - Median household incomes per the U.S. Census (data from King County, map by Lid I-5)

Our first request is that the I-5 lid concept be described more directly and fully in the Regional Transportation Plan. In the current draft document, lidding I-5 is only briefly mentioned without any specifics. Text from Chapter 4, page 174, under the heading “Reimagining and Repurposing Infrastructure”, reads:

“The I-90 lids on Mercer Island and in central Seattle provide room for parks and schools, and WSDOT is currently constructing a new freeway lid at Montlake Boulevard as part of the SR 520 bridge replacement project. In recent years, similar community efforts to reimagine and repurpose sections of I-5 through central Seattle have emerged. As WSDOT and other partners work to maintain, preserve, and potentially replace aging infrastructure, PSRC should provide information about innovative national and international projects as models for these conversations.”

This section in Chapter 4 should be expanded with more information on the existing lids, Freeway Park and the Washington State Convention Center, that provide proof of concept. This section should also explain the Central Seattle I-5 lid’s potential public benefits, local policy support, and the regional opportunities, alongside a summary of the work to-date (including the feasibility study) and the next steps needed for project development. Next steps include:

- A Downtown Seattle transportation and traffic impact study, including evaluation of potential changes to the configurations of I-5 lanes and ramps
- Geotechnical explorations and assessment of site conditions
- Agency alignment, sponsorship, and selection of a project governance model

- Equitable community engagement and a master land use plan
- Environmental analysis (SEPA/NEPA), engineering, and design

Relatedly, PSRC could consider listing an I-5 lid in Central Seattle as a discrete project in the RTP. At this early stage of development it may be considered “unprogrammed”, have flexibility on project sponsorship, show an approximate location as Denny Way to Madison Street, and list an estimated cost range of \$1-2.5 billion. Listing an I-5 lid in the plan could help unlock federal funding that has been specifically dedicated for freeway mitigation and would coordinate well with the Washington State Legislature’s proposed funding.

Second, the Regional Transportation Plan should commit PSRC to bolder action on lidding I-5.

This could include working with WSDOT and the City of Seattle to secure project funding and convening regional I-5 stakeholders to discuss opportunities and challenges during the planning process. And, given the new federal priority for mitigating the community and environmental impact of urban freeways, PSRC’s relationship with the federal government is an important asset that should be leveraged to help advance and fund the project.

Federal interest is demonstrated by the \$1 billion Reconnecting Communities Pilot Program (H.R. 3684, 2021 Infrastructure and Investment Jobs Act, section 11509). Federal funding has played an important role in recent lid projects around the country, such as [Frankie Pace Park](#) in Pittsburgh, [Klyde Warren Park](#) in Dallas, and [The Stitch](#) in Atlanta. The USDOT maintains [project profiles](#) of innovative projects like freeway lids, including those above and others in Washington, DC, San Francisco, St. Louis, and our own [Freeway Park](#) in Seattle.

The draft RTP suggestion for PSRC to provide information about project models is welcome but not directly helpful, because the Lid I-5 group has already been a national leader in assembling such information, as demonstrated by our website (lidi5.org/case-studies) and a published book on case studies (we can provide a copy). Similarly, many academic and technical studies have already inventoried existing lid projects and models both nationally and abroad.

Third, the opportunity to integrate lidding I-5 into freeway preservation work should be addressed in the Regional Transportation Plan. Text from Chapter 1, page 111, under the heading “Maintenance and Preservation in the Regional Transportation Plan”, reads:

“Maintaining and preserving the region’s roadways – including addressing the existing backlog – is a \$28 billion investment. The needs of I-5 alone are estimated to be at least \$2.5 billion based on the most recent data available. This investment includes pavement, bridges, fish barriers electrical and other necessary preservation needs. Nearly 1/5th of the state’s total preservation needs by cost are on I-5.”

This section should include PSRC’s support for WSDOT to receive the resources it needs to study the deficiency issues of I-5 in more depth. It should also describe the opportunity to lid I-5 in locations where major preservation, retrofit, or reconstruction occurs.

Building lids over the current freeway in Central Seattle is feasible, but the freeway’s obsolete design and aging structures could make this challenging. It would almost certainly be more cost efficient to integrate a lid project into a larger initiative which addresses the freeway’s structural and seismic issues. Such a scenario needs further study and should be supported by PSRC.



Figure 3 - Excerpt from the I-5 Lid Feasibility Study showing one of the test case land use scenarios, with a mix of parks (green), mid-rise buildings (red and light blue), and high-rise buildings (dark blue)

Fourth, the proposed widening of I-5 at Lake City Way (project #4198) and reconstructing the Mercer Street and SR 520 Interchanges (project #4200) should both be scoped to include meaningful community mitigation such as substantial lids. While these are respectively “candidate” and “unprogrammed” projects with few details available, it is not too early to plan both the transportation and mitigation elements of these projects. It is now best practice to lid reconstructed urban freeways to address the harms of noise and air pollution, unsightly views, displacement, and disconnected neighborhoods.

PRSC’s support of these projects should be contingent upon several principles:

- Under the “fix it first” approach promoted by USDOT Secretary Pete Buttigieg and other transportation leaders, ensure that the \$2.5 billion in deferred I-5 maintenance and preservation work is substantially funded before or alongside these two projects.
- Minimize land takings and increases in the freeway footprint to no more than required for the project’s stated purpose, avoiding the destruction of homes, businesses, streets, and public parks as much as possible.
- Adopt anti-displacement policies and measures for surrounding residents and businesses.
- Fund major community mitigation such as substantial lids, pedestrian/bike overpasses, and reconnected streets. The land uses on lids should be determined by equitable community engagement. Lid candidate sites include Roosevelt and Green Lake, the SR 520/I-5 interchange at Eastlake and North Capitol Hill, and above the Mercer Street ramps west of I-5.

In reviewing the decades of scientific research on freeway widenings, we know their ability to solve congestion is negated by the phenomenon of induced demand. Freeway widenings (particularly project #4198) typically exacerbate inequities in our transportation system by increasing air pollution and reducing funding available for more sustainable modes. However, standardizing interchange designs (particularly project #4200) to eliminate leftside and closely spaced merges could have important traffic safety benefits – there is a similar issue in the Downtown area that could also be addressed as part of the Central Seattle lid project.

We are also concerned about the cost-to-benefit ratio of project #4200, with over a \$1 billion estimated cost that appears to primarily benefit single-occupancy vehicles. There is a project scheduled in this corridor for \$68 million, the [SR 520 I-5 Express Lanes Connection Project](#), which will efficiently improve travel for people riding transit and carpooling. Alternatives with reduced costs should be explored.

Thank you for your time and attention to the Central Seattle I-5 lid project. We appreciate PSRC's careful consideration of solutions that prioritize the safety, health, and access to opportunity for everyone in the Puget Sound region as well as the beauty and health of our unique environment. We are available should you have questions or need additional information.

Sincerely,

Scott Bonjukian
Seattle, WA 98126
mail@lidi5.org
www.lidi5.org

Lid I-5 Steering Committee

Natalie Bicknell
Scott Bonjukian, Co-Chair
Jim Castanes
Liz Dunn
John Feit, Co-Chair
Bruno Lambert

Lid I-5 Coalition Partner Organizations

Seattle Parks Foundation
Allied Arts
American Institute of Architects – Seattle Chapter Public Policy Board
Capitol Hill Ecodistrict
Central Seattle Greenways
Community Roots Housing
Downtown Seattle Association
First Hill Improvement Association
Futurewise
Freeway Park Association
Melrose Promenade
Meridian Condominium Homeowners Association
Northwest Progressive Institute
Parents for a Better Downtown Seattle
Pike/Pine Urban Neighborhood Council

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