



WASHINGTON
TRUST FOR HISTORIC
PRESERVATION

December 13, 2010

Angela Freudenstein
Washington State Department of Transportation
Alaskan Way Viaduct Replacement Project SDEIS
999 Third Ave., Suite 2424
Seattle, WA 98104

RE: Alaskan Way Viaduct (SR99) Replacement Project – SDEIS

Dear Ms. Freudenstein,

The Washington Trust for Historic Preservation received information on CD related to the Supplemental Draft Environmental Impact Statement (SDEIS) for the Alaskan Way Viaduct Replacement Project. Thank you for sending this information. As a consulting party through the Section 106 process for this project, the Washington Trust appreciates the opportunity to provide comment.

After reviewing material included in the SDEIS, the Washington Trust agrees that a number of cultural resources will be adversely affected. In addition, while proposed best practices utilized before, during and after construction are anticipated to prevent adverse effects, the potential for other cultural resources to experience unanticipated adverse effects remains.

Both the Viaduct, slated to be removed, and the Battery Street Tunnel, slated to be de-commissioned, have been identified as eligible for inclusion in the National Register of Historic Places (NRHP). As noted in the SDEIS, HAER documentation has been completed for these resources, while other interpretive programs are under development. The Washington Trust looks forward to learning more about the scope and breadth of these interpretive elements and engaging in discussions related to additional mitigation measures for the loss of the resources.

Numerous historic resources have been identified within the Area of Potential Effect (APE). The SDEIS anticipates that the majority of these resources will not be adversely affected by the tunnel and may experience damage classified as ‘very slight to slight’ given the proposed monitoring and grouting measures. While these monitoring and grouting measures seem appropriate, given the intensely complicated nature of the project, comprehensive contingency measures should be in place in the event adverse effects become evident and damage increases as a result of construction. The timeframe for monitoring settlement is described in the SDEIS as being 6 months prior to construction through 1 year after the project is completed. Consideration should be given

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to extending this window on either end given the fact that settlement from construction activity and subsequent vibration effects due to vehicular traffic can take a long time to manifest.

Of paramount concern are the Western and Polson Buildings, located near the proposed south portal tunnel entrance. Each building serves as a contributing element to the Pioneer Square Historic District. Due to the deteriorated existing condition of the Western Building, the SDEIS notes that demolition may be the only safe option. Demolition of the Western Building should be considered only as a last resort and after the discovery of clear evidence suggesting the building would not withstand construction activity related to the tunnel boring machine. To this end, the Washington Trust respectfully requests a copy of the structural engineering report for the Western Building. While structural reinforcement measures have been implemented to the Polson Building, the SDEIS notes the potential for 'severe to very severe damage' to occur. Because of this, and due to the fact that the Polson Building shares a common wall with the Western Building, considering should be given to adding the Polson Building as subject to use under Section 4(f) review.

The Pioneer Square Historic District constitutes an irreplaceable historic resource for the city, state and region. While much consideration has been given to the buildings, it seems that other elements related to the district have not received the same attention. For example, the areaways below grade are associated as character-defining features of historic buildings. The SDEIS notes that no adverse effect is anticipated to those areaways that retain historic integrity. Areaways, even if minor settlement occurred, may be more vulnerable to damage than their above ground counterparts. It may be prudent to pay closer attention to these elements even though the above ground resources with which they are associated are not anticipated to be adversely affected.

Finally, traffic in and around the Pioneer Square Historic District is a concern. While removal of the Viaduct may enhance the historical context of the district (a somewhat problematic claim made in the SDEIS), it will certainly increase traffic. Yet the SDEIS does not highlight any adverse effects for the historic district related to traffic either during or after completion of the project.

The Washington Trust for Historic Preservation looks forward to addressing these issues and others with all stakeholders involved. Thank you for the opportunity to comment on this important and monumental project.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Moore". The signature is fluid and cursive, with a large initial "C" and "M".

Chris Moore
Field Director