



STATE OF WASHINGTON

Office of Archaeology and Historic Preservation

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AWWSP Team Office

July 30, 2004

Ms. Allison Ray
Urban Corridors
Washington State Department of Transportation
999 Third Avenue, Suite 2424
Seattle, WA 98104

In future correspondence please refer to:
Log: 020303-02-WSDOT
Property: Alaska Way Viaduct
Re: Draft EIS Comments

Dear Ms. Ray:

Thank you for contacting the Washington State Office of Archaeology and Historic Preservation (OAHP). The above referenced project has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication. Review comments from the Washington State Office of Archaeology and Historic Preservation have been requested regarding historic resources. I have received and reviewed the Draft Environmental Impact Statement for the Alaska Way Viaduct. My specific comments are listed below:

Draft EIS

- S-005-001** • The format of the DEIS makes it difficult to find the sections relevant to Section 106 in the text of the DEIS. The table of contents also does not provide much help in finding the discussions on cultural resources.
- S-005-002** • Page 148, Question 12: this section states that before demolition begins, the closest buildings will be evaluated to determine their vulnerability to damage from construction activities. I recommend also performing surveys on known historic structures further away from the work site that are fragile or vulnerable to construction activities and vibration.

Appendix L, Historic Resources Technical Memorandum

- S-005-003** • Exhibits 2-2, 2-3, and 2-4 are confusing with the differentiation between Landmark eligible (blue) and National Register and/or City Landmark (tan). According to Exhibit A-1, all of the buildings colored blue (landmark eligible), are eligible for the National Register. It would be helpful to have Exhibits 2-2, 2-3, and 2-4 use a different scheme for showing the different historic resources. Perhaps a shaded area for the historic districts, a color for the National Register eligible or listed structures, and another color for local historic structures. Make sure that the way buildings are

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S-005-001

We hope you found the technical index on page 161 of the Draft EIS, page 134 of the 2006 Supplemental Draft EIS, and pages 256-257 of the 2010 Supplemental Draft EIS helpful for referencing the Historic Resources and Archaeological and Cultural Resources sections. The Draft Section 4(f) Evaluation included in the 2006 Supplemental Draft EIS (pages 116-121) and 2010 Supplemental Draft EIS (pages 224-244) also provide a discussion of Section 106. Please see the Final EIS for current project information, including a technical index and the Final Section 4(f) Evaluation.

S-005-002

Comment noted. Surveys were performed on historic buildings within the project's APE. Any damage to historic buildings or areaways that occurs during construction would be repaired.

See Final EIS Appendix I, Historic, Cultural, and Archaeological Resources Discipline Report, for more information about potential construction effects on historic resources and the proposed mitigation measures.

S-005-003

The exhibits have been reformatted for increased clarity.

S-005-003 | labeled in Exhibits 2-2, 2-3, and 2-4 are consistent with the eligibility determinations in Exhibit A-1.

S-005-004 | • More information is needed than is provided in Appendix L for the buildings and structures that will be demolished, moved, or altered to help with the effect determination and MOA processes. Inventories for all resources studied as part of the DEIS need to be provided to OAHP in an electronic format.

S-005-005 | • In Chapter 8 of Appendix L, Operational Mitigation, the surface alternative has a mitigation measure to monitor buildings and areaways for vibrations impacts. However, none of the other alternatives proposes this mitigation. Vibration monitoring should be included as a mitigation measure in all alternatives, particularly since several of the other alternatives will require pile driving, which will create vibration impacts. Or it may be more appropriate to put this discussion in Chapter 9, Construction Mitigation.

S-005-006 | • Appendix L references other appendices for more detailed information on project impacts. These other appendices do not analyze the project impacts from a perspective of quantifying the level of effects on historic resources. Either Appendix L needs to take the information in the other appendices and use it to fully quantify project impacts, or the other Appendices need to have a section dedicated to how those topics can cause impacts to historic resources.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,



Russell Holter
Project Compliance Reviewer
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S-005-004

Inventory forms have been provided electronically, along with the additional information needed.

S-005-005

Vibration monitoring is included as part of construction mitigation for all the build alternatives.

S-005-006

The various relevant appendices have been coordinated to indicate more clearly the impacts on historic resources.