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.

**C-018-001** 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.

**C-018-002** 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.

**C-018-003** 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

1204 Minor Avenue • Seattle, WA 98101 • tel 206.624.9449 fax 206.624.2410 • wa-trust.org

**C-018-001**

WSDOT has identified those historic properties that will be adversely affected by developing measures in consultation with consulting parties to avoid, minimize and/or mitigate adverse effects. These measures will be outlined in Section 106 Memorandum of Agreement. As part of this Section 106 consulting process, WSDOT developed an unanticipated discovery protocol to address potential unanticipated discoveries of archaeological resources, including human remains. WSDOT and the Design Builder will also develop a monitoring and instrumentation plan and contingency plan as well as a claims process, which will address potential unanticipated effects to built environment resources.

**C-018-002**

The Section 106 consulting parties, including the Washington Trust for Historic Preservation, have been involved in developing mitigation plans and the Section 106 Memorandum of Agreement. WSDOT will continue to work with the Washington Trust for Historic Preservation as a consulting party.

**C-018-003**

The monitoring plan will be refined and updated before tunneling begins. Each building will also be inspected again by structural engineers. The monitoring enables any settlement impacts to be detected immediately so that they can be prevented or minimized. If damage does occur to historic buildings, it will be repaired according to the Secretary of the Interior's Standards for Rehabilitation of Historic Properties. The monitoring plan will be addressed in the Section 106 Memorandum of Agreement.

C-018-003 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.

C-018-004 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.

C-018-005 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.

C-018-006 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,

Chris Moore
Field Director

**C-018-004**

The Western Building's existing poor structural condition means that it cannot withstand settlement as well as other nearby historic buildings. After studying various options for retrofitting or demolishing the building, and receiving public input, WSDOT determined that a protection plan for the Western Building could be implemented with the Bored Tunnel Alternative. The settlement impacts would be mitigated by:

1. Strengthening the foundation with micro piles and grade beams, or constructing a reinforced concrete wall system, or using a combination of both approaches.
2. Installing epoxy grout and wrap on cracked concrete columns and beams.
3. Constructing a temporary exterior steel frame and interior shoring and bracing.
4. Injecting compensation grout to manage building settlement to less than 0.5 inches.

The steel framing and the interior shoring and bracing would be removed when the risk of settlement diminishes, leaving the exterior appearance of the building approximately the same as it is currently. The work would be reviewed by the Pioneer Square Preservation Board and would be done in compliance with the Secretary of the Interior's Standards for Rehabilitation of Historic Buildings (36 CFR 67.6). This work would require tenants to be relocated. The building would be unavailable for 12 to 20 months while it is being reinforced.

The Polson Building is not at risk of collapse or demolition, even though it shares an adjoining wall with the Western Building. The surrounding soil would be stabilized with compaction grouting and, if needed, the basement would be reinforced on the interior.

Buildings and structures (both historic and non-historic) along the

alignment have been inspected and evaluated by structural engineers. The potentially affected buildings and the monitoring plan are discussed in Chapter 6 of Appendix I, Historic, Cultural and Archaeological Discipline Report, of the Final EIS. The construction process includes monitoring of selected buildings and structures before, during and after tunneling. This will enable any settlement impacts to be detected immediately so that they can be prevented or minimized. If damage does occur to historic buildings, it will be repaired according to the Secretary of the Interior's Standards for Rehabilitation of Historic Properties.

The Final Section 4(f) Evaluation follows Chapter 9 in the Final EIS and discusses Section 4(f) resources subject to use under each of the build alternatives.

**C-018-005**

The Bored Tunnel alignment is some distance from Pioneer Square's areaways and no impacts on them are anticipated. The areaways are included in the monitoring program; instrumentation has already been installed in First Avenue areaways. Any damage would be minimized by careful monitoring to warn of potential settlement as the TBM advances; temporary supports or cribbing would be installed in the unlikely event that the monitoring and building assessment indicate a need. The areaways are discussed in more detail in Chapters 4 and 6 of Appendix I, Historic, Cultural and Archaeological Discipline Report, of the Final EIS.

**C-018-006**

Analysis of traffic patterns for vehicles accessing ramps to and from SR 99 in the stadium area show that vehicles would disperse onto several streets such as S. Royal Brougham Way, Alaskan Way, First Avenue, and Fourth Avenue. Please see the Final EIS Appendix C, Transportation Discipline Report for the transportation analysis. Because traffic in Pioneer Square is controlled by signals, it is not anticipated that

the increased volume will affect the pedestrian character nor will it make it more difficult to walk to shops or restaurants. Pioneer Square has historically been an active place with a high volume of traffic. Modest increases in traffic volumes are expected between 2015 and 2030. In most cases, these traffic volume increases are related to expected population and employment growth in the study area and region.