

From: Erin O'Connor [mailto:erinoc28@comcast.net]
Sent: Monday, March 08, 2010 2:45 PM
To: Young, Jenifer (Consultant); SR 520 Bridge SDEIS
Cc: Brooks, Allyson; 'Houser, Michael (DAHPI)'; governor.gregoire@governor.wa.gov; Turner, Joyce; Arnold-Williams, Robin; Brown, Marty; edward.murray@eg.wa.gov; frank.chopp@eg.wa.gov; jamie.pedersen@eg.wa.gov; mike.mcgin@seattle.gov; 'Richard Conlin'; mike.obrien@seattle.gov; tom.rasmussen@seattle.gov; 'Jean Godden'; tim.burgess@seattle.gov; Nick.Licata@Seattle.Gov; 'Sally Clark'; bruce.Harrell@Seattle.gov; sally.bagshaw@seattle.gov; Meredith, Julie; Everett, Randolph (FHWA); Williams, Scott; ken.juell@wsdot.wa.gov; Karen.Gordon@seattle.gov; 'Ted Lane'; 'Cheryl Thomas'
Subject: EOC Comments on December 2009 Cultural Resources Discipline Report in Jan 2010 SDEIS

Erin O'Connor
2612 10th Ave E
Seattle, WA 98102
March 8, 2010

Jenifer Young
Environmental Manager
SR 520 Program Office
600 Stewart Street, Suite 520
Seattle, WA 98101

Dear Ms. Young:

We expect the attached comments to influence the accuracy and thoroughness of the *Cultural Resources Discipline Report* that goes into the *Final Environmental Impact Statement*. These comments will also serve the growing record of our exchanges, over four drafts, with WSDOT consultants over persistent inaccuracies that have led to flawed findings plus the introduction of new misinformation with respect to the Roanoke Park Historic District and historic resources in the Portage Bay neighborhood in the *Cultural Resources Discipline Report* part of the January 22, 2010, *Supplemental Draft Environmental Impact Statement*.

A pattern of repeated mistakes and omissions and the introduction of new mistakes in the four drafts of the *Cultural Resources Discipline Report* we have seen persists. Our prompt, thoroughgoing, and painstaking reviews and sequential commenting that would have made many of the mistakes easy to correct call into question whether the *Cultural Resources Discipline Report* has been competently prepared.

The extensive *Seattle Times* coverage of the sorry history of the Hood Canal Graving Dock project included Governor Gary Locke's reflection that

"It is really unfortunate that so much money has been spent on the project, and that the experts didn't detect the magnitude of this historic site at the beginning."

A subsequent external analysis of the project by Foth and Van Dyke and Associates, "an engineering consulting firm specializing in archaeology and cultural resource management on large scale construction projects," found that

"The permit streamlining process entered the project late and the timeline limited the ability of the permitting agencies to fully consider site alternatives.

"Overly focused on Endangered Species Act concerns, there was inadequate attention given to archaeological, socioeconomic and geological considerations." The archaeologists contributing to the

C-008-001

After the SDEIS was published, WSDOT continued the Section 106 consultation process and increased communication with the Section 106 consulting parties. WSDOT met with the author of this comment letter in the summer of 2010 as part of the Section 106 process associated with the Roanoke Park/Portage Bay Community Council. WSDOT worked extensively with the comment author and other representatives of the Roanoke Park Historic District to identify the effects of the SR 520, I-5 to Medina project on the historic district and to identify mechanisms for resolving the project's adverse effect on historic resources. WSDOT has worked toward resolution on a number of comments and concerns expressed and will continue to interact with the comment author and council representatives as a Section 106 consulting party and community adjacent to the SR 520 project corridor.

There are no parallels between the Hood Canal Graving Dock project and the SR 520, I-5 to Medina project.

C-008-001

Cultural Resources Discipline Report (or its equivalent at that time) for the graving dock project estimated that only 25 burials would be found within the construction site, whereas “335 individuals and their funerary objects, along with some 1,000 of isolates” and 10,000 artifacts had been unearthed by the time the project was halted.

The report also found

“Considerable weakness in the archaeological assessment” and said that WSDOT “did not follow consistent protocols or gather sufficient information for addressing compliance with the cultural resources assessment and consultation requirements of Section 106 of the National Historic Preservation Act.”

The report also noted

“WSDOT’s lack of timely notification and involvement of the Lower Elwha Tribe and the State Historic Preservation Officer and the divergent opinions that increasingly surfaced as the true extent of the village was discovered.”^[1]

According to a History Link Essay on the project WSDOT paid less than \$7,000 for the original survey.

According to a brief wikimapia.org account of the project,

“This case stands out as a fine case study of what is wrong with low bid contracting of all sorts. If the state had hired contractors who had then undertaken an in-depth and properly conducted study of the location, then they would have identified that there were intact archaeological deposits (thereby warranting further study).”

A March 20, 2003, joint letter from the Army Corps of Engineers and the Washington Department of Ecology responding to WSDOT’s application for permits for construction of the graving dock highlights a similar inadequacy in WSDOT’s research, this time in WSDOT’s Environmental Investigation Results report (October 25, 2002), WSDOT’s Geotechnical and Hydrologic Study report (December 3, 2002), and WSDOT’s Supplemental Environmental Investigation Results (December 3, 2002). The letter notes that

“The chemical measurements were incomplete and did not include important contaminants” and that “the sampling was insufficient in number and spatial extent.”

The letter also says that the permit’s proposal for disposing of excavated materials

“also threatens historic/cultural resources, a fact not mentioned in the permit application.”

House Bill 2624 signed into law by Governor Gregoire March 31, 2008, legislated new standards for the treatment of human remains, including not just tribal remains but also remains found in all pioneer cemeteries.^[2]

The parallels with WSDOT’s flawed Section 106 process and findings, now with respect to the historic built environment for the SR 520 Bridge Replacement and HOV Project, are striking. We had hoped that

^[1] The Foth analysis project, conducted in collaboration with the State of Washington’s Joint Legislative Audit Review Committee (JLARC) received the 2007 Impact Audit of the Year Award from the National Legislative Program Evaluation Society (NLPEs).

^[2] Although WSDOT was forced to choose a new site and a reburial ceremony was held after the Tribe had brought a lawsuit on treatment of the remains and the site, the some 10,000 artifacts unearthed by WSDOT at the original site reside now in 900 cedar boxes at the Burke Museum. WSDOT refuses to release the artifacts to the Tribe until the Tribe has constructed a cultural center to house them. WSDOT has leased the site to the Tribe but has not taken any steps to help finance a cultural center. Fund-raising to build a center on land that is leased, not owned, is difficult.

C-008-001 | analogous higher standards, without the need for lawsuits, audits, and new legislation, would be brought to bear on the representation, assessment, effects findings, and avoidance, minimization, and mitigation strategies for historic resources of the built environment for this project. Instead, we kept receiving apologies and excuses, through four drafts of the *Cultural Resources Discipline Report* for the SDEIS, that there simply was not enough time to do the job properly. The refusal to take that time or to grant that time to its consultants—that is, the refusal to perform accurate and substantiated assessments and findings—reflects poorly on the professionalism and credibility of WSDOT.

C-008-002 | We request remedy of the many mistakes in the December 2009 *Cultural Resources Discipline Report* and a Memorandum of Agreement between WSDOT and the Portage Bay/Roanoke Park Community Council that discusses ways of avoiding, minimizing, and mitigating the obvious adverse effects that this project will have on the historic resources of the built environment in the Roanoke Park Historic District and the Portage Bay neighborhood.

C-008-003 | In addition, with the prospect of phased implementation looking increasingly more likely and the consequent projection in the *SDEIS* of deferral indefinitely of the construction of the lid at East Roanoke Street over I-5 and the lid between 10th Avenue East and Delmar Drive East over SR 520, we request that projections of noise, air quality, and other effects on the Roanoke Park Historic District and the Portage Bay neighborhood reflect data for both lidded and unlidded construction and operation. (Note that at least one member of the Legislative Workgroup has already proposed not constructing the lid over I-5 at East Roanoke Street as an economizing measure.)

C-008-004 | The current *CRDR* bases its findings of no adverse effects on lidded, noise-walled designs. We also request that noise data be developed from measurements and projections of noise levels at bedroom height.

And even though WSDOT test results for quieter pavement have been skewed by improper installation, we request that data on the designed use of quieter pavement on the bridges, highway, and local arterials and the effects predicted for bedroom heights be presented in the *FEIS* noise discipline report.^[3]

C-008-005 | Misinformation and diminutions in the *Cultural Resources Discipline Report* of the extent and significance of historic resources in the Roanoke Park Historic District and of historic resources in the Portage Bay neighborhood that will be affected by this project, repeated now in the December 2009 *Visual Quality and Aesthetics Discipline Report* and other discipline reports in the *SDEIS*, have been put at the service of findings of “no adverse effect” and thus no need for a Memorandum of Agreement to address adverse effects to the historic resources in these neighborhoods.

The diminishing language needs to be corrected, the adverse effects need to be acknowledged, and the mitigation of the adverse effects should be taken up in a Memorandum of Agreement.

C-008-006 | WSDOT’s refusal, announced in its *Indirect and Cumulative Effects Discipline Report*, to mitigate cumulative effects on the ground that it has no jurisdiction over other agencies is a distortion of the intent of the cumulative effects definition. With the exception of the Sound Transit University Tunnel project, which WSDOT promises to discuss with that agency, the past, present, and reasonably foreseeable effects on historic resources in our communities come from WSDOT projects. WSDOT presumably has jurisdiction over itself. “There is already a bridge there, so a [wider, higher] replacement bridge [moved north in front of more of our homes] would not be an adverse effect,” for example, cries out for a cumulative adverse effects finding instead.

C-008-007 | Hiding local cumulative effects in region-wide study areas is another evasive tactic that masks real adverse effects—on the salmon in Portage Bay, the Montlake Cut, Union Bay, and Lake Washington, for instance, where huge amounts of money have been spent to make the waters hospitable to salmon after the damage

^[3] Consultation with the Arizona Department of Highways on installment and maintenance of quieter pavement would be a good idea. Quiet pavement in Flagstaff has survived chains, studded tires, and freezing and thawing for more than seventeen years.

C-008-002

The 2009 Cultural Resources Discipline Report, was a draft document provided for consulting party review and based on feedback from that review it, was prepared as the 2010 Cultural Resources Report published with the SDEIS. These draft documents led to the Final Cultural Resources Assessment and Discipline Report (Attachment 7 of the Final EIS). The 2009/2010 document was not revised because consultation with the Section 106 consulting parties contributed to the development of the final documentation of historic properties, the analysis of project effects and findings, and measures for resolving the adverse effect from the project.

In place of a Memorandum of Agreement, a more suitable Programmatic Agreement was used as the formal, legally binding document between FHWA, the Advisory Council on Historic Preservation (ACHP), the State Historic Preservation Officer (SHPO), WSDOT and the other Section 106 consulting parties. A Programmatic Agreement is typically used in place of a Memorandum of Agreement when effects on historic properties cannot be fully determined prior to the approval of an undertaking, for large, complex and controversial undertakings, or where other circumstances warrant a departure from the normal Section 106 process.

The Programmatic Agreement (Attachment 9 to the Final EIS) between FHWA, ACHP, the SHPO, WSDOT and the other Section 106 consulting parties records the terms and conditions agreed upon to resolve the adverse effect from the project. Discussions and negotiations between WSDOT/FHWA and the Section 106 consulting parties for this Programmatic Agreement took place from fall 2010 through mid-2011. The Portage Bay/Roanoke Park Community Council was a consulting party under Section 106 and participated in development of the agreement.

Following a thorough analysis, research, and review, WSDOT

C-008-007

done by the first SR 520 project. WSDOT would undo that work and expenditure and excuse the ruin with a net loss figure that takes in the waters of the whole Puget Sound region.

C-008-008

So much evasiveness and bad faith on the part of WSDOT in the *SDEIS* of January 22, 2010, does not bode well for communities who have earnestly tried to work with this agency and who have been forced by WSDOT's fecklessness to do much of the work of the agency.

Sincerely,

Erin O'Connor
Historic Resources Chair, Portage Bay/Roanoke Park Community Council
Roanoke Neighborhood Elms Fund
Friends of Roanoke Park

Cc: Dr. Allyson Brooks, State Historic Preservation Officer, DAHP
Michael Houser, State Architectural Historian, DAHP
Governor Christine Gregoire
Sen. Edward Murray
Rep. Frank Chopp
Rep. Jamie Pedersen
Mayor Mike McGinn
Seattle Councilmember Richard Conlin, Chair, Regional and Sustainable Development; Chair, SR 520
Seattle Councilmember Mike O'Brien, Vice-Chair, Regional and Sustainable Development
Seattle Councilmember Tom Rasmussen, Chair, Transportation
Seattle Councilmember Jean Godden, Vice-Chair, Transportation; Member, Regional and Sustainable
Development
Seattle Councilmember Tim Burgess, Alternate, Regional and Sustainable Development; Member,
Transportation
Seattle Councilmember Nick Licata, Member, Transportation
Seattle Councilmember Sally Clark, Alternate, Transportation
Seattle Councilmember Bruce Harrell, Alternate, Transportation
Seattle Councilmember Sally Bagshaw
Julie Meredith, P. E., SR 520 Program Director, WSDOT
Randolph Everett, Major Projects Oversight Director, FHWA
Scott Williams, Cultural Resources Program Manager, WSDOT
Ken Juell, Cultural Resources Specialist, WSDOT
Karen Gordon, City Historic Preservation Officer, Seattle
Ted Lane, President and Transportation Chair, Portage Bay/Roanoke Park Community Council
Cheryl Thomas, Beautification Chair and Alternate Representative PB/RP CC
Dan Bricklin, Esq.
Wes Larson, Esq.

C-008-009

Formal Comments on December 2009 Iteration of WSDOT's *Cultural Resources Discipline Report* included in the January 22, 2010, release of the *Supplemental Draft Environmental Impact Statement* for the SR 520 Bridge Replacement and HOV Project

The three early parts of these comments take up the Multiple Adverse Effects of the construction and operation of the project on historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood, the Cumulative Adverse Effects of the project, and the Flawed Section 106 Negotiation Process with WSDOT consultants. **The rest of the comments, in the attached file,** take up in a condensed version specific errors and oversights, page by page, with respect to historic resources in these neighborhoods and the thus flawed effects findings in the December 2009 *Cultural Resources Discipline Report*.

determined that the Roanoke Park Historic District's characteristics of integrity would be altered by construction and operation of the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. However, stipulations of the Programmatic Agreement and the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS) will resolve the effects that could temporarily or permanently alter or diminish the integrity of the historic district. The setting and feeling of the Roanoke Park Historic District would be indirectly affected by the project, but these effects would be minimized and mitigated through the Programmatic Agreement and Community Construction Management Plan.

C-008-003

The SDEIS discussed the possibility of constructing the project in separate phases over time, with the vulnerable structures (the Evergreen Point floating bridge, west approach bridge, and Portage Bay bridge) built first. This "Phased Implementation scenario" was analyzed for each environmental resource. Due to the funding shortfall, FHWA and WSDOT still believe it is prudent to evaluate the possibility of phased construction of the corridor should full project funding not be available by 2012. Currently committed funding is sufficient to construct the Evergreen Point floating bridge and landings; a Request for Proposals has been issued for this portion of the project, with proposals due in June 2011. Accordingly, this Final EIS discusses the potential for the floating bridge and landings to be built as the first phase of the SR 520, I-5 to Medina project. This differs from the SDEIS Phased Implementation scenario, which included the west approach and the Portage Bay bridge in the first construction phase. See Section 2.8 of this Final EIS for further information on potential project phasing.

The Preferred Alternative does not include a lid over I-5 (see Chapter 2 of the Final EIS). Instead, the proposed I-5 lid will be replaced with an enhanced bicycle and pedestrian crossing. However, the lid over 10th

C-008-010 | **Multiple Adverse Effects**
More than a third of the contributing 80 historic resources and almost half of the individually eligible 57 historic resources in the Roanoke Park Historic District and many resources in the Portage Bay neighborhood both surveyed and unsurveyed would suffer multiple adverse effects from the demolition, construction, and operation of the SR 520 Bridge Replacement and HOV Project from all of its options and most extremely from Option A and its suboptions. Additional historic resources on the western side of the Roanoke Park Historic District and unsurveyed properties in the Portage Bay neighborhood would suffer adverse effects from hauling, demolition vibration and dust, reconstruction, and operation, particularly if lids are deferred as they are said to be in descriptions of the Phased Implementation Scenario predicted in the *SDEIS* to be the most likely outcome.

C-008-011 | **Construction**
Properties in the Portage Bay basin are noted for their **views**, which would be adversely affected by construction of the wider Portage Bay Bridge moved farther north, construction just south of the NOAA Fisheries Building, and the construction of an additional connector across or under the Montlake Cut. Barges, work bridges, machinery, and construction activity would introduce high contrast changes over a seven-and-a-half-year to eight-year construction period (*Section 4(f) Evaluation*, p 65) to the views east from more than a third of the Roanoke Park Historic District's contributing historic resources and almost half of the historic district's individually eligible historic resources and would thus significantly affect setting, feeling, and characteristic use of the historic district.

The same **visual blight** would be imposed on the three individually eligible historic resources in the Portage Bay neighborhood that have thus far been surveyed and on many more historic resources in the Portage Bay neighborhood that have not been surveyed—on houses along both sides of Delmar Drive East that enjoy spectacular views of the bay and on historic resources in the houseboat community and on both sides of Fuhrman-Boyer Avenue East.

C-008-012 | • We request that the survey of historic resources in the Portage Bay neighborhood be complete and that it include historic resources on both sides of Delmar Driver East, resources along both sides of Fuhrman-Boyer Avenue East including the bungalow resources on East Gwinn Street, and historic resources in the houseboat community.^[4]

C-008-013 | • We request that historic resources in the Portage Bay neighborhood discovered in the course of completing the survey be included in the Area of Potential Effects (APE) for the project—in other words that the APE boundary be redrawn to include these vulnerable historic resources.

C-008-014 | • We request that references to views enjoyed by “only a few” of historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood be amended to reflect the true count and that the adverse effects on views and other aspects of the historic resources from construction of the project be acknowledged.

C-008-015 | • We request that a Memorandum of Agreement treat the obvious adverse effects on historic resources of construction with strategies for avoidance, minimization, and mitigation.

C-008-016 | The effects of the seven-and-a-half-year to eight-year construction activity described below would be compounded by the current staging, excavation, and hauling of Sound Transit's deep-bore (300-foot deep) twin tunnel construction project under the Montlake Cut. Trucks will haul excavated material from the deep hole across the Montlake Bridge to SR 520. Construction is expected to last until some time in 2016. WSDOT's declining to put the multiple and cumulative effects of these two simultaneous major projects into its effects findings “because it doesn't have jurisdiction over other agencies” (Chapter 7, p 7-1) is disingenuous. And its refusal to consider as **cumulative effects** “the incremental impact of its [SR 520 Project] action when added to other past, present, and reasonably foreseeable future actions” of its own

^[4] Note in addition that the survey of historic resources in the North Capitol Hill neighborhood does not even include Carl F. Gould's own residence (unaltered), designed by Gould, on East Lynn Street.

Avenue East and Delmar Drive East is still included as a major project element of the Preferred Alternative. Lids would be built at the same time as the corresponding portion of the corridor, and mitigation measures would be undertaken concurrently with the portion of the project causing the impact.

Major project elements were included in the models and analysis used for the Final EIS. WSDOT's models have shown that once the project is complete, mobility, access, neighborhood connectivity, air quality, traffic noise, and water quality in the project area would improve.

C-008-004

Noise modeling for both the SDEIS and Final EIS was performed for the typical outdoor uses at noise sensitive properties along the corridor, as required by the FHWA and WSDOT. No noise modeling is performed at upper floors except for multi-family residences where a deck is the main outdoor use. The analysis uses projected year 2030 traffic volumes and vehicle mixture (cars, medium and heavy trucks, and buses) at the proposed speed limits, and included the effects of the lids and tall traffic barriers. WSDOT's noise analysis and abatement efforts are in compliance with the National Environmental Policy Act of 1969, the Federal-Aid Highway Act of 1970, the Noise Control Act of 1972, and follows the Code of Federal Regulations (CFR) 772.

The noise analysis of the Preferred Alternative includes noise reduction strategies such as 4-foot concrete traffic barriers with noise-absorptive coating, and a reduced speed limit on the Portage Bay Bridge. An analysis of noise walls is also included where warranted. The FHWA traffic noise model has shown that with the Preferred Alternative, overall corridor noise levels would be reduced compared to the No Build Alternative.

Quieter concrete pavement is included as a design feature for Option A, Option K, and the Preferred Alternative; however, because it is not an

- C-008-016** | projects is perverse unless the agency hopes thus to avoid, not adverse cumulative effects, but having to negotiate a Memorandum of Agreement on avoiding, minimizing, and mitigating these effects.
- C-008-017** |
 - Increases in **noise** from demolition, hauling, staging, and construction at many sites at bedroom height of historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood over the seven-and-a-half-year to eight-year construction period can be expected.
 - Nighttime construction **glare and noise** from many staging, hauling, and construction sites over the seven-and-a-half-year to eight-year construction period are likely.
- C-008-018** |
 - Increased **diesel traffic** during peak construction periods over seven-and-a-half to eight years on local arterials on the west and south borders of the Roanoke Park Historic District and on Fuhrman-Boyer Avenue East and Delmar Drive East in the Portage Bay neighborhood is expected. Diesel traffic is more polluting and noisier than auto traffic.
- C-008-019** |
 - Traffic **congestion and air pollution** from idling vehicles detouring along residential streets in both the Roanoke Park Historic District and the Portage Bay neighborhood can be expected.
 - Damage to buildings, landscaping, and parked cars (and life and limb) from detouring vehicles speeding along residential streets can be expected as well.
- C-008-020** |
 - **Concrete dust** from the demolition of the East Roanoke Street, 10th Avenue East, Delmar Drive East, and Portage Bay bridges and the consequent erosion and soiling of buildings, dusty windows, and damage to landscaping, including the mature shade trees on its south side for which the Roanoke Park Historic District is noted, are expected.
 - **Fugitive dust and fugitive emissions** from diesel engines and machinery during hauling, staging, and construction with their contribution to the erosion and soiling of buildings, dusty windows, vibration, and damage to landscaping including the mature trees that buffer the district from the present operation of freeways on its west and south borders are to be expected.
- C-008-021** |
 - The **removal** in fifty-foot-wide swaths during construction of **vegetation** that helps to buffer the historic resources from the effects of the present operation of SR 520 on the south is to be expected as well.
- C-008-022** |
 - The very real threat from demolition and construction **vibration** to historic resources perched on steep, landslide-prone hills all over the area from I-5 to Portage Bay and the accompanying threat to historic resources below these properties will loom over these properties during the seven-and-a-half to eight years of demolition and construction vibration.
- C-008-023** |
 - **Lessened use** of the contributing Roanoke Park because of its proximity to detours, haul routes, staging sites, and demolition and construction sites is to be expected.
 - Intermittent and shifting **curtailed access** to homes and neighborhood schools during the seven-and-a-half-year to eight-year construction period is expected.
- C-008-024** |
 - The no doubt accurate **perceived damage to healthy livability** of historic resources and the consequent **lowering of values and changes of population** during an extended seven-and-a-half-year to eight-year construction project is to be expected. Single families with children are likely to move away and to be replaced by lower-income renters. The families served by the Portage Bay/Roanoke Park Community Council have among them 126 children under the age of 20, including 79 children under the age of 14. These figures are likely an undercount because in this age parents don't like to disclose this kind of information. The change to this single-family, owner demographic would be an **adverse secondary, or indirect, effect**.

Operation

FHWA-approved mitigation measure and because future pavement surface conditions cannot be determined with certainty, it is not included in the noise model for the project. WSDOT is continuing testing and evaluation of quieter pavement to determine the best overall pavement type for the project.

C-008-005

WSDOT has engaged the Portage Bay/Roanoke Park Community Council in the project's Section 106 process and has attempted to address the council's concerns about the 2010 Cultural Resources Discipline Report. WSDOT responded to council comments on the Cultural Resources Discipline Report and allowed the council a 30-day review and comment period for the Final Cultural Resources Assessment and Discipline Report prior to publication.

The Portage Bay/Roanoke Park Community played an integral role in the Section 106 negotiations and was active in the development of the Programmatic Agreement (Attachment 9 to the Final EIS). The Programmatic Agreement records the terms and conditions agreed upon to resolve the adverse effect of this project. Please see the response to comment C-008-002 above.

C-008-006

While it is the policy of WSDOT and FHWA not to attempt to mitigate cumulative effects unilaterally, WSDOT does mitigate the direct and indirect effects of transportation improvement projects. By mitigating direct and indirect effects, WSDOT ensures that project contributions to cumulative effects are avoided or minimized. In this way, the SR 520, I-5 to Medina project will help mitigate cumulative effects to the fullest extent possible for an individual project.

- C-008-025**
 - From operation, permanent damage to setting and feeling by **high contrast changes to the views** for which properties in the Portage Bay basin are noted, especially caused by the wider and higher Portage Bay Bridge, with massive noise walls in Options A and L, moved farther north in front of these properties, is expected.
 - From operation of Option A, **views** of the delicate span of the Montlake Bridge and its Carl F. Gould towers would suffer permanent damage from the adjacent second bascule bridge.
 - From operation, **views** from many historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood, of Portage Bay, the Colonial Revival Seattle Yacht Club and the brick and terra-cotta NOAA Fisheries Building, both designed by John Graham, Sr., would suffer permanent damage from the intrusion of the out-of-scale wider and higher adjacent bridge shifted north and right beside the Fisheries Building.
- C-008-026**
 - From operation, a permanent increase in **noise levels** from bus traffic and more vehicle traffic in the two new lanes would reach the bedrooms of residents of the Roanoke Park Historic District and in the historic resources in the Portage Bay neighborhood.
- C-008-027**
 - From operation, a permanent increase in **air pollution** would cause damage to historic resources from exterior erosion and soiling, dusty windows, and damage to vegetation from more lanes for bus and vehicle traffic.
- C-008-028**
 - From operation, a permanent increase in **vibration** from the increase in bus and vehicle traffic on the replacement bridge moved north closer to historic resources and the consequent risk of landslides under historic resources perched on steep hillsides can be expected. (Houses close to the present four-lane SR 520 experience detectable although tolerable vibration already.)
- C-008-029**
 - An **accurate perceived permanent damage to the healthy livability** of historic resources from the project's operation from I-5 to SR 520 and in the Portage Bay basin and a consequent lowering of values and changes in population are to be expected. Single families with children are likely to move away and to be replaced by lower-income renters. The many families with young children have been growing as has the number of single families with children in the Roanoke Park Historic District and the Portage Bay neighborhood. With the operation of a wider, closer SR 520 bridge and increases in traffic, noise, air pollution, and nighttime glare, that single-family, owner demographic trend is likely to change, and that would be an **adverse, secondary, or indirect**, effect.
- C-008-030**

Cumulative Adverse Effects

"An effect that results from the **incremental** effect of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such actions. Cumulative effects can result from **individually minor but collectively noticeable actions taking place over a period of time.**"

The collective, multiple foreseeable adverse effects of this WSDOT project described in these condensed comments along with the cumulative nature of these collective, multiple foreseeable adverse effects added to past and present adverse effects of WSDOT projects on these historic resources call for a Memorandum of Agreement between WSDOT and the neighborhoods served by the Portage Bay/Roanoke Park Community Council.

WSDOT's statement of refusal in the *SDEIS* to engage in cumulative effects findings because it doesn't have jurisdiction over other agencies—itsself a questionable rationale—does not excuse it from considering the adverse cumulative effects of its own projects, past, present, and future. Such an obligation to consider adverse cumulative effects of its own past projects, present projects, and future projects should forestall in the *CRDR* and other discipline reports the ubiquity in many of the discipline reports of arguments such as "there is already a bridge there, so a replacement bridge would not create an adverse effect." WSDOT's determined efforts throughout the *SDEIS* not to acknowledge the temporal, historical aspect of the

C-008-007

The intent of cumulative effects assessment, as articulated by the President's Council on Environmental Quality in its 1997 guidance, is to identify trends in the status or condition of a valued resource and determine how the combined effects of past, present, and reasonably foreseeable future actions, including the indirect and direct effects of a project, would influence those trends, resulting in a decline, improvement, or stable condition. The cumulative effects assessment addresses salmon at the regional level because their condition, and trends affecting their condition, are also assessed at the regional or overall population level.

Additionally, WSDOT has worked with the presiding natural resources agencies to avoid effects and to select appropriate mitigation measures that will minimize potential effects on affected water resources and their salmon populations. Please see the Mitigation section of the Ecosystems Discipline Report for more information.

C-008-008

FHWA and WSDOT determined the SDEIS met full compliance with NEPA regulations, including those related to disclosure prior to publication. WSDOT has worked to respond to all public comments received on the SDEIS since publication. WSDOT will continue coordinating with the community to address ongoing concerns through the subsequent design and construction steps of the project.

C-008-009

WSDOT has reviewed and prepared a response for each of the submitted comments. Please see below.

C-008-010

After the SDEIS was published, WSDOT reviewed the potential for the

- C-008-030 | cumulative effects definition, which is stated in clear language, should be challenged before more damage, perhaps past a tipping point, is done.
- C-008-031 | **Flawed Section 106 Negotiation Process**
- We weren't given sufficient meeting time to take up the specifics of our corrections to the September 2009 version of the *CRDR*, the second draft we had reviewed and offered corrections for, or of the writer's many additions and changes to the September 2009 version in the third, 11/16/2009, iteration of the report and our comments on them. The writer, Lori Durio, who was talking to us via telephone, had to close her participation in the meeting, and Environmental Lead Marsha Tolon stayed a bit longer although she was due at another meeting. Connie Walker Gray, the other architectural historian who had been working with us, did not attend the meeting.
 - We appreciated the news that editorial and mechanical suggestions we had made in response to the third review question about how the September 2009 document could be improved were passed on to the editor of the document, and we won't repeat many of those suggestions in this round of comments. We will mention editorial problems with the new, December 2009, version of the *Cultural Resources Discipline Report* that interfere with consistency and sense and therefore with clarity, accuracy, and earned, legitimate, and logical conclusions about effects.
 - We are dismayed, after so many efforts on our part—over three drafts—to correct misinformation and omissions, that the fourth draft, the flawed December 2009 version of the *CRDR*, was included in the January 22, 2010, release of the *Supplemental Draft Environmental Impact Statement*. Even more dismaying than the continued dissemination of misinformation in the *CRDR* is realizing that misinformation in the *CRDR* has been carried over to other parts of the *SDEIS*, such as the Section 4(f) evaluation, Chapter 4 on the project area's environment, Chapter 7 on indirect and cumulative effects, and most egregiously to the Roanoke Park Historic District and the Portage Bay neighborhood, both noted for their panoramic and memorable views of high vividness, the December 2009 *Visual Quality and Aesthetics Discipline Report*. Note that these unaltered views were rated and described more favorably in the 2005 *VQADR* than in the December 2009 version of the *VQADR* and that the effects of even the old four-lane and six-lane alternatives on views were said to be profound, that is, "very noticeable." Has the discipline of aesthetics changed so much? Or is a strategy of denigrating present circumstances in order to find no adverse future effects from the project at work?
 - We learned in the Monday, November 30, 2009, meeting that our speedy review of the 11/16/2009 iteration of the 213-page *Cultural Resources Discipline Report*, which we received via e-mail nine days later, on Wednesday, November 25, 2009, which review we accomplished over Thanksgiving in time for the Monday morning meeting discussion November 30, 2009, would nevertheless be unlikely to result in substantive corrections to representations of the Roanoke Park Historic District and other historic resources within the APE and to effects findings with respect to the Roanoke Park Historic District and Portage Bay neighborhood historic resources in the version of the *Cultural Resources Discipline Report* that would go into the *SDEIS*. The revised 11/16/2009 version of the *CRDR* could have been and should have been delivered to us in a timely way. Our comments and corrections should have appeared in the December 2009 *CRDR*.
 - We were told in a telephone conversation subsequent to our 11/30/2009 meeting that Lori Durio, the writer of the *Cultural Resources Discipline Report*, had three reports due for the *SDEIS*, and while we are sympathetic, we think that the poor quality and the incompleteness of the previous iterations and now of the *SDEIS* version of the *Cultural Resources Discipline Report* are inexcusable. This report after all purports to describe the effects of the construction and operation of a years-long, massive transportation project on our historic homes and some ways of mitigating those inevitable effects on our historic district and on historic resources in the Portage Bay.
 - New mistakes were introduced into the table of **eligible** historic resources, Exhibit 15 (formerly Exhibit 13). We had asked in the interest of balance and completeness that similar column heads and information comparable to the column heads and information in the table on eligible historic resources, Exhibit 15

Preferred Alternative to have an adverse effect on the historic properties within the Area of Potential Effects. WSDOT determined that the general construction impacts may alter the integrity of the setting and feeling of Roanoke Park Historic District. As noted in the Final Cultural Resources Assessment and Discipline Report, although indirect effects may alter the setting and feeling of the Roanoke Park Historic District, they would not diminish the district's characteristics of integrity.

The Section 106 consultation process resulted in a Programmatic Agreement (Attachment 9 to the Final EIS), which records the stipulations agreed upon to resolve the adverse effect from the project. WSDOT worked with the Portage Bay/Roanoke Park Community Council and other Section 106 consulting parties to develop the Programmatic Agreement and is working to develop a Community Construction Management Plan (outlined in Attachment 9 to the Final EIS); both of which would resolve the project's adverse effect on historic properties.

See the response to Comment C-008-003 regarding the Phased Implementation scenario and the timing of construction of lids. Lids would be built at the same time as the corresponding portion of the corridor, and mitigation measures would be undertaken concurrently with the portion of the project causing the impact.

C-008-011

Construction of any type of project can be disruptive. Although the setting and feeling of the Roanoke Park Historic District would be altered by construction activities in Portage Bay, none of the impacts would be permanent. WSDOT provides all reasonable measures possible in its projects to minimize negative visual effects.

WSDOT will employ a number of best management practices to reduce the visual effects of the construction of the Portage Bay Bridge and of associated construction activities. Additionally, WSDOT has worked in

C-008-036

(formerly Exhibit 13), be introduced into Exhibit 13 (formerly Exhibit 12) of **listed** historic resources. Instead the Roanoke Park Historic District, which is listed in the National Register for Historic Places and the Washington Heritage Register, was moved into Exhibit 15, for properties “eligible” for listing. A description of the Street Address/Location for the Roanoke Park Historic District in Exhibit 15 sites the historic district on the northeast side of the intersection of SR 520 and I-5. Better for conveying the single-family residential nature of the district would be to describe it specifically, as the eligible Montlake Historic District is described in Exhibit 15 and as the Roanoke Park Historic District is described in its NRHP nomination: the Roanoke Park Historic District is roughly bounded by East Roanoke Street, Harvard Avenue East, East Shelby Street, and 10th Avenue East. See this correction and additional corrections for Exhibits 13 and 15 and other pages in the sequential comments section of this document.

C-008-037

- Per our request, the entire nomination form for the Roanoke Park Historic District is now included in Attachment 4. However, in Part 7 of the *CRDR*, a layout problem that originated with the photo of the Mayor Ole Hanson House on one page and its description on the following page next to a photo of the Storm House leads to misidentification of all of the 50-some photographed properties. The Hanson House photo and its information should be on the same page so that all of the subsequent photos will be correctly identified by their descriptions on the same pages as the house photos they describe.

C-008-038

- We had a chance in the one-hour and a little more meeting Monday morning, November 30, 2009, to discuss specific changes to the six-page Executive Summary of the *Cultural Resources Discipline Report* and to ask further about procedural matters including when we would have an opportunity to consult on Section 4(f) findings with respect to the Roanoke Park Historic District and the other historic resources our Community Council represents. We learned then that the Section 4(f) negotiation process, which we had inquired about many times in the course of our meetings with WSDOT consultants, had bypassed us, that we would have no opportunity to review and comment on the report, and that the report would go directly into the *SDEIS* without our having seen the report.

C-008-039

- We request that our comments here on the December 2009 *Cultural Resources Discipline Report* be considered, that they be discussed with us where the WSDOT consultants agree and differ, and that corrections be entered in the *Cultural Resources Discipline Report* for the *Final Environmental Impact Statement*. We hope that the final version of the *CRDR* will finally be free of repeated and new mistakes in depictions of the historic resources in neighborhoods represented by the Portage Bay/Roanoke Park Community Council. Effects findings (and “no adverse effects” findings) based on faulty information must be corrected.

C-008-040

- We request, too, that misinformation about the Roanoke Park Historic District and the Portage Bay neighborhood that has tainted effects findings in other chapters and discipline reports of the January 22, 2010, *SDEIS* be corrected in those chapters and reports as well.

C-008-041

- We request earlier and more review time for the next iteration—an interim draft before the *Final Environmental Impact Statement*—of the *Cultural Resources Discipline Report* and an opportunity to discuss our comments with the writer and the other WSDOT consultants. No matter how long it takes. The rush to publication is not warranted when shoddy work is published.
- We request opportunities to review, inform, and comment on the next iteration of the Section 4(f) Evaluation report as early as possible.
- We request that WSDOT consultants reach out to the North Capitol Hill Neighborhood Association and the Eastlake Community Council as representatives in Section 106 negotiations over historic resources that lie within those local governments’ jurisdictions and within the Area of Potential Effects. We had assumed that this would be done. The owners of those historic resources have not been invited to become consulting parties to Section 106 negotiations.
- WSDOT did not reach out to the Portage Bay/Roanoke Park Community Council and ask us to be a consulting party in Section 106 negotiations and waited many months to meet with us after our request

coordination with the Section 106 consulting parties and other affected community members to develop a Community Construction Management Plan (Attachment 9 to the Final EIS) to further reduce the construction impacts on properties in the project area, including historic properties.

C-008-012

The Area of Potential Effects (APE) was amended to include properties along potential haul routes. A comprehensive survey of all properties built before 1972 within this expanded APE area was conducted in June 2010. The completed Historic Property Inventory forms including determinations of eligibility for the surveyed properties are included in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

A number of resources in the Portage Bay neighborhood, along Delmar Drive East and Fuhrman-Boyer Avenue, were surveyed. The bungalows and houseboats referenced in this comment were not surveyed because they are not located within the amended project APE. Only the historic resources located within the APE were documented in the analysis of this project. WSDOT made a reasonable and good faith effort to identify historic properties that may be affected by both construction and operation of the SR 520 project. In this process, sufficient information was acquired to enable WSDOT to assess the effects of the project on historic properties for the purposes of Section 106 compliance.

C-008-013

Since the *SDEIS* was published, the APE has been expanded. Please see the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) for a map of the revised APE. The Washington State Department of Archaeology and Historic Preservation (DAHP) have concurred with the boundaries of the project APE.

C-008-041

January 18, 2009, to become a consulting party. Much time that could have been devoted to the production of an accurate report was lost. Although we had been told that the Section 106 process would resume in January 2010, we heard only last week, on March 4, 2010, from the WSDOT consultants. We are invited to a training on Section 106 negotiation March 16, 2010, to be conducted by the Department of Archaeology and Historic Preservation (DAHP)—this after our struggling with incorrect and constantly changing instruction and information on Section 106 for over a year.

C-008-042

- If such delays and the poor quality of WSDOT work come from overwork and understaffing, WSDOT needs to staff up. The lack of time and lack of staff that have led to the poor quality of the *Cultural Resources Discipline Report* and to the misinformation disseminated from the report into other chapters and discipline reports of the *SDEIS* are not fair to the communities whose fate depends on WSDOT consultants' doing accurate, logical Section 106 work.

C-008-043

- WSDOT and federal and state government should consider as well the evident conflicts of interest that have dogged the Section 106 process in the State of Washington. The contractors employed by WSDOT to lead us through the process and at the same time negotiate with us have been lax about the conditions—lack of time and staff, misinformation about the process—that have led to the poor research and misinformation on which their findings of “no adverse effects,” agreeable to WSDOT, have been based. This has put the communities at a considerable disadvantage. Section 106 law needs to address this conflict of interest. Perhaps DAHP, an agency with its own powers and budget now coming in to instruct us in Section 106 process, should have been introduced into the negotiation process sooner as an advocate for the historic resources we amateurs have been trying to protect. The performance of the consultant professionals in architectural history and Section 106 negotiation contracted by WSDOT have been so compromised by a lack of staff and time and by loyalty to their employer that they have abandoned concern for the preservation of the historic resources they have been charged to protect.

Specific comments are attached.

*** eSafel scanned this email for malicious content ***
*** IMPORTANT: Do not open attachments from unrecognized senders ***

C-008-014

The number of historic properties in the Roanoke Park Historic District that enjoy views of Portage Bay has been revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

Visual effects on historic properties from construction were acknowledged in the SDEIS and are further discussed, with modified language, in the Final Cultural Resources Assessment and Discipline Report.

As part of the 2010 Cultural Resources Discipline Report, temporary work bridges, barges, and heavy equipment used for demolition and construction of the Portage Bay Bridge were specifically identified for their potential to create a change to visual quality in the Roanoke Park Historic District. The new Portage Bay Bridge was also noted for its potential to alter the setting and feeling of the Roanoke Park Historic District.

The Cultural Resources Discipline Report also stated that the setting and feeling of the Roanoke Park Historic District would be temporarily diminished during construction.

A broader discussion of change in visual quality was included in the Visual Quality and Aesthetics Discipline Report (Attachment 7 of the Final EIS).

C-008-015

Please see the response to Comment C-008-002, which states that a Programmatic Agreement will be used in place of a Memorandum of Agreement.

Erin O' Connor
2612 10th Ave E
Seattle, WA 98102
March 8, 2010

Jenifer Young
Environmental Manager
SR 520 Program Office
600 Stewart Street, Suite 520
Seattle, WA 98101

**Comments on the December 2009 Cultural Resources Discipline Report
in the January 22, 2010, SDEIS**

As in the past three of our reviews of CRDR drafts, more than a little repetition, for which we apologize, arises from our effort to keep corrections sequential so that they will be easy to make.

Executive Summary p. i (covered in Monday, November 30, 2009, meeting with WSDOT consultants)

C-008-044

- i, third para The writer agreed to change "several" in reference to the hundreds of historic properties within the study area—the Area of Potential Effects (APE)—to "many."

C-008-045

- We mentioned at that point that the editorializing addition of much diminishing language ("only," "slightly," "minor," "not substantially," or "not substantial,"—before a finding of "therefore no adverse effect"—and the frequent insertion of the vague words "generally speaking"—again before a finding of "therefore, no adverse effect") in the 11/16/2009 iteration of the *Cultural Resources Discipline Report* was distressing to us as were incomplete and minimizing descriptions of the intensity and the extent of effects that have to do with the Roanoke Park Historic District and the other historic resources with which our community council is concerned. The writer agreed to make changes to this language if we would point out the other instances, which we will do in the course of these comments.

C-008-046

- ii, second para under "Seattle" head The writer declined again to add the 101 properties in the Roanoke Park Historic District and the 80 contributing properties in the Roanoke Park Historic District to the 12 count of historic built environment listed properties in the Seattle study area in this paragraph. That one of the listed 12 properties is a 101-property district containing 80 contributing historic resources and we believe 57 individually eligible historic resources is relevant to conveying the great number of historic listed and eligible properties in the Seattle study area. Representing the district as one property leads to a perception that there aren't many listed historic resources in the Seattle study area. The number is relevant because the large number of listed and eligible historic resources in the APE calls for an especially delicate approach applied widely to design, construction, and operation of a project of such great magnitude in such a small, historic setting.
- iii, second para The writer declined again to include the 101 properties and 80 contributing properties in the count of "surveyed built environmental properties" because the listed properties, unlike the 217 unlisted properties (and 141 eligible properties) mentioned in this paragraph had not been "surveyed," a strict reading in which a change of verb would permit the breadth and number of historic resources in the APE to be truly represented in this report. The net effect is the continued diminution of the number of historic resources in the Seattle study area.

C-008-016

WSDOT examined the potential for construction effects of the SR 520, I-5 to Medina project to overlap in time and vicinity with the construction effects of other projects, producing concurrent construction effects. The tunneling referred to in the comment is expected to be completed by mid-2013. Therefore, it would not occur concurrently with construction of the Portage Bay Bridge and new bascule bridge. However, construction of University Station, which is part of Sound Transit's University Link, would overlap with construction of the Portage Bay Bridge and new bascule bridge. WSDOT found that concurrent construction effects on visual quality would not result from the SR 520, I-5 to Medina project together with University Station construction because the two projects would be sufficiently separated by distance. However, the two projects have potential to produce concurrent noise effects from construction. It should be noted that University Station construction would not involve pile driving.

C-008-017

Although noise may be increased due to construction activities, WSDOT will comply with all regulations and ordinances governing noise. Acceptable construction noise levels inside city limits are set by the City of Seattle and are in the Seattle Municipal Code, Chapter 25.08. WSDOT will conform to these noise levels and those contained in Chapter 173-60 of the Washington Administrative Code. WSDOT will employ best management practices and will monitor noise levels during construction to ensure compliance with applicable noise regulations. The mitigation measures in the construction mitigation plan will also help to minimize the impact from construction noise.

WSDOT will continue to work with communities to define construction management through the permit and approval process.

For a list of noise, see the Mitigation section of the Noise Discipline

C-008-046

- For the third time, the writer declined to include individually eligible properties in the Roanoke Park Historic District to these counts, this time on the basis that none of them would be individually eligible because they are in an already listed district. State Architectural Historian Michael Houser of the Department of Archeology and Historic Preservation said, "Not true" (e-mail exchange December 3, 2009), that "many individual properties in historic districts have been listed." A follow-up question to Michael Houser to be sure that this was true of properties after district listing produced the same reply, and "some folks just like that individual listing." We are aware of Roanoke Park Historic District residents who want to pursue that individual listing and relieved that we have not misinformed them that they can.
- We formally request again that a count of properties in the Roanoke Park Historic District eligible for individual listing be mentioned in the counts on pp ii and iii as a count of individually eligible properties in the Montlake Historic District has been mentioned in these summaries. If the writer does not have time to determine the individual eligibility of properties among the 80 contributing Roanoke Park Historic District resources, we request that WSDOT have a qualified consultant make these determinations in a fair and complete account.
- In the course of these comments, we will suggest many historic resources within the Roanoke Park Historic District, which lies entirely within the APE, that we think are eligible for individual listing and on what basis. Our initial survey concluded that **28** historic resources of 80 contributing resources in the RPHD would be eligible for listing on the basis of Criterion C alone, as exemplars of the work of notable architects and builders. Our survey among the 80 contributing resources of historic resources that might be individually eligible for listing on the basis of Criterion A alone, for their associations with both events and broad patterns of our history, came up with **8** candidates. In other words, a total of 36 historic resources would be individually eligible for listing on the basis of either Criterion A or Criterion C. We think that another **21** historic resources among the 80 contributing properties would be eligible on the basis of both Criterion A and Criterion C. Realizing that our objectivity might be constrained by our fondness for the history and the architecture of the district, we look forward to a professional evaluation of individual eligibility to corroborate or amend our estimated total number of **57** individually eligible historic resources and would appreciate the forwarding of the result to the State Historic Preservation Officer for concurrence. And we request that this information inform accounts of the number of historic resources in the Area of Potential Effects.
- We formally request again that properties in the Roanoke Park Historic District both contributing and eligible for individual listing be brought to bear on effects findings for the Roanoke Park Historic District in the *Cultural Resources Discipline Report* as they are in effects findings for the eligible Montlake Historic District. State Architectural Historian Michael Houser, State Historic Preservation Officer Dr. Allyson Brooks, and the National Register have already concurred on identification of contributing properties, easily available in the nomination's table containing addresses, names of houses, and contributing (80) or non-contributing (21) status. Our successful nomination of the Roanoke Park Historic District for listing in the National Register and the Washington Heritage Register, readily available and already accessed by the writer at our suggestion, includes detailed architectural and cultural descriptions as well as high quality black and white photos that along with visits to the district can inform determinations of individual eligibility and whether on the basis of Criterion A or Criterion C or both as well, as has been done for the Montlake Historic District.

C-008-047

- The writer did agree to bring at least consideration of Roanoke Park Historic District contributing properties to bear on effects descriptions and findings in the *Cultural Resources Discipline Report* as has been done for both individual properties identified as contributing and individual properties identified as individually eligible in the report's effects findings for the eligible historic resources in the Montlake Historic District. With respect to effects findings in the Roanoke Park Historic District, this has not been done consistently in the December 2009 *SDEIS* version of the *CRDR*. In the course of these review comments, we will point out places in the *CRDR* in addition to the

Report Addendum (Attachment 7 to the Final EIS).

WSDOT will also employ best management practices to reduce nighttime glare.

C-008-018

A quantitative analysis of construction air quality effects, including diesel exhaust from construction equipment and hauling, fugitive dust from demolition and site grading, emissions associated with workers' commutes, and other construction-related air quality concerns, is included in the Air Quality Discipline Report Addendum (Attachment 7 to the Final EIS). During construction, best management practices would be used to minimize construction emissions. WSDOT will comply with the procedures outlined in the Memorandum of Agreement between WSDOT and the Puget Sound Clean Air Agency for controlling fugitive dust. Federal regulations require the use of ultra-low-sulfur diesel fuel in on-road trucks, and regulations that took effect in 2010 require the use of ultra-low-sulfur diesel fuel for construction equipment. See the Mitigation Measures section of the Addendum for further discussion.

Additionally, averages of only three to six trucks per hour are expected for the potential haul routes that border the Roanoke Park Historic District.

C-008-019

The detour routes through the Roanoke Park Historic District and Portage Bay neighborhoods have been eliminated.

C-008-020

Please see the response to Comment C-008-018, which states that best management practices will be employed during construction to minimize the associated fugitive dust and emissions.

- C-008-047** | Executive Summary where both kinds of determinations—contributing and individually eligible—should be mentioned.
- C-008-048** |
- Although not all of the 57 contributing historic resources we think might be eligible for individual listing on the basis of Criterion A or Criterion C or both will suffer direct effects from the construction and operation of the project, the whole district will suffer if a good proportion—well more than half—of those 80 contributing and 57 individually eligible resources experience direct, indirect, multiple and/or cumulative adverse effects. Many of them will.
- C-008-049** |
- iii, first bulleted item The writer also agreed to include in the Executive Summary a total of all historic resources and not count the two historic districts as one property each, so that the Executive Summary can convey the total, a large number, of historic resources in the Seattle study area. As we have indicated, this is relevant because the large number of historic resources within the Seattle study area calls for an especially delicate approach applied widely to design, construction, and operation of a project of such great magnitude in such a small, historic setting. We would like to see the number of individually eligible resources included in this item describing the Roanoke Park Historic District as the number of individually eligible resources in the Montlake Historic District have been included in the sister bulleted item on page iii.
- C-008-050** |
- iii, paragraph after second bulleted item The 231 count of properties either listed in or eligible for the NRHP seems to be off. The 33 individually eligible properties outside the two historic districts added to the 35 individually eligible properties in the MHD would result in a sum of 68 individual properties either listed or eligible for the NRHP. If the MHD and the RPHD were counted as one property each, 33 plus 2 would be 35. If individually eligible properties in the RPHD, estimated at 57, were added to the 33 individually eligible properties outside the two historic districts and the 35 individually eligible properties in the MHD, the sum at most would be 125. Not all of the 141 contributing properties in the MHD or of the 80 contributing properties in the RPHD are individually eligible. If just contributing properties in the two districts were added to the 33 individually eligible properties outside the two districts, the sum would be 254. What does the 231 count include?
- C-008-051** |
- We have expressed many times in previous comments and in meetings with WSDOT consultants the importance of accuracy and clarity in the Executive Summary, which might be all that many busy people will read of the *Cultural Resources Discipline Report*. We have noted that these passages have been inadequate and confusing, and they remain inadequate and confusing and under-represent the extent and the significance of historic resources in the Area of Potential Effects.
- C-008-052** |
- iii, last paragraph (continued on iv) The preliminary nature of construction effects findings should be emphasized up front in this discussion, not parenthetically at the end of its second paragraph. Given the large number of contributing properties and we believe individually eligible properties and the foreseeable multiple and cumulative adverse effects of design, construction, and operation of all three of the six- and seven-lane options on historic properties in the Roanoke Park Historic District not discussed in the report, we think that the Roanoke Park Historic District should have been and should be included in this bulleted preliminary list of historic properties that might suffer adverse effects.
- Note that the paragraph refers to both construction and operation effects as preliminary but says that additional adverse effects might be added once construction details are known. Why are “operation” effects, which have also been identified as preliminary, not subject to such emendation?
- C-008-053** |
- iv, bulleted list We request that the Roanoke Park Historic District be included in this preliminary finding of historic resources that might suffer adverse effects from project construction and operation. We also request that the contributing and individually eligible status of historic

WSDOT has conducted a survey of selected trees in this area and will monitor the health and livelihood of the trees throughout construction of the project. However, existing research indicates proposed construction activities would not have a negative effect on trees in vicinity of the project.

C-008-021

As stipulated in the Programmatic Agreement, “WSDOT will install landscaping or landscaped buffers where practicable in areas where buffer zones are being removed or reduced, and where new or relocated traffic lanes would intrude on the character of a historic district or the settings of individual historic properties.”

The Community Construction Management Plan (outlined in Attachment 9 to the Final EIS) is being developed in coordination with Section 106 consulting parties and other affected community members. The plan will include provisions to retain existing native vegetation to the greatest extent possible. WSDOT may also install landscaping or landscaped buffers in areas where buffer zones must be removed or reduced.

C-008-022

The possibility of landslides caused by vibration is addressed on page 136 of the Cultural Resources Discipline Report, which states that “no landslides in the historic district are expected from project construction.” The risk of vibration-induced landslides in the glacially overconsolidated silt and clay is relatively low because the magnitude of soil deformation is quite small, too small to shear the soil and cause loss of strength. Because of the relatively low permeability, construction vibrations are also unlikely to result in loss of strength in the landslide deposits. Throughout construction, WSDOT will monitor vibration at sensitive locations and will take measures to minimize potential effects.

- C-008-053** | resources in the Roanoke Park Historic District be brought to bear on effects findings later in the report as such status is brought to bear on effects findings for the historic resources in the Montlake Historic District.
- C-008-054** |
 - We request that historic resources in the Portage Bay neighborhood likely to experience adverse effects from the project be mentioned in this preliminary list, as well.
- C-008-055** |
 - vi, “Pontoon Production and Transport” discussion We wondered again why the highly specific closing section on Pontoon Production and Transport had been tacked on to the end of the Executive Summary, which was otherwise general and summarizing. We wondered, too, as we had in our first review comments, why land hauling (and detours and staging) in addition to water hauling had not been considered in this section if hauling routes were going to be discussed so specifically at all in a summary. The writer declined to take up land hauling (and presumably detours and staging) in this section and agreed at Marsha Tolon’s suggestion to write something early in the Summary that would provide a rationale for including this specific water hauling information in the Summary. The writer added a sentence to the first paragraph of the Executive Summary saying that pontoon transport effects are discussed at the end of the Executive Summary but does not provide a rationale for this detailed treatment of pontoon transport in a summary.
- C-008-056** |
 - For reasons of time, we did not repeat the query in our earlier review comments why the accustomed uses seven days a week of St. Patrick’s Church and possible effects on these uses from land hauling had not been taken up in this curiously specific section on the effects of water hauling on the Boating Community’s accustomed Opening Day. The writer told us that someone at WSDOT wanted the section on Pontoon Construction and Hauling to be included in the Executive Summary and did not say why our earlier request for discussion of land hauling and specifically of hauling effects on the customary uses of St. Patrick’s Church were not included in this section or even in a section of its own in this summary. We request in the interest of balance that this be done if the specific section on water hauling will remain in the Executive Summary.
- C-008-057** | *Introduction p. 1*
 - 1, first bulleted item Include Laurelhurst and the Boating Community among the Seattle project area communities.
- C-008-058** |
 - 4, first para under “Seattle” head Say “as well as the existing local street bridges across I-5 and SR 520.” Replacement of the East Roanoke Street bridge across I-5 is a part of the project.
- C-008-059** |
 - 4, second para under “Seattle” head Mention first the different designs for the Portage Bay Bridge under the three options. The difference between a six-lane and a seven-lane bridge is substantial enough to be mentioned in this paragraph.
- C-008-060** |
 - 5, Exhibit 4 showing Options A, K, and L in the Montlake and University of Washington areas should be preceded by a map showing the different configurations of the Portage Bay Bridge in the three options.
- C-008-061** |
 - 6, first para “A new seven-lane bridge” (last draft) has been changed to “six-lanes (four general-purpose lanes , two HOV lanes) plus a westbound auxiliary lane”? What is the difference between an auxiliary lane and a lane?
- C-008-062** |
 - 6, second para “Suboptions [plural] for Option A” are the subject of the opening sentence. The second sentence of the para speaks of “The suboption [singular].”
- C-008-063** |
 - 7, first para Concluding that quieter pavement cannot be considered mitigation ignores its inclusion not as mitigation but as part of the design of Option K. Note, too, that the results of WSDOT tests of quieter pavement have been so far skewed by improper installation. WSDOT might consult with the highway department of Flagstaff, Arizona, where quieter pavement has

Please see the Geology and Soils Discipline Report Addendum (Attachment 7 to the Final EIS) for further discussion.

C-008-023

As discussed in Chapter 6 of the SDEIS, construction is expected to affect the natural and built environment in the project area. WSDOT, through the Section 106 process, coordinated with consulting parties to identify ways to minimize the effects of corridor construction and operation on historic properties.

No detours, staging sites, or demolition will be located within the boundaries of Roanoke Park, and the park’s functions will be maintained throughout construction. Although construction would occur near schools and homes, access will be maintained.

C-008-024

Research indicates that the effects of a transportation project on property values cannot be calculated with certainty. Property values fluctuate constantly based on a variety of factors, including the general condition of the economy at the national, state, and local level. Proximity to a newly constructed roadway is another factor that may have an effect on the value of the property, but it is not possible to quantify this effect with any certainty. Some properties could be negatively affected by a new roadway, while others could benefit from reduced congestion. Therefore, it would be speculative to draw conclusions about changes in property value, and consequent changes in population, as a result of the project.

C-008-025

Although the view of the new Portage Bay Bridge would have a minor visual effect on the Portage Bay landscape unit, it would not significantly change visual quality because a bridge is already the dominant structure in the views in this area. The new bridge would not block views from the

- C-008-063 | successfully withstood studded tires, chains, and freezing and thawing over a goodly amount of time, for 17 years back in 2007.
- C-008-064 | • 8, first para Update this description. The rows of three ten-foot-tall concrete columns are not shown in recent sketches. The pontoons themselves would be taller, rising more than their current 10 feet out of the water, and their visible height above the water should be added to the height of the columns. The “new spans” (span?) are (is?) estimated to be at least 29 feet, not 22 feet, higher than the existing floating bridge. Noise walls variously said to be from 8 to 12 feet or 8 to 14 feet will add to the height of the floating span.
- C-008-065 | • 8 Do the descriptions on this page refer to all of the options, or is the discussion still about Option L? According to Exhibit 5’s title, the discussion refers to all of the options. Page 8 should therefore open with language to help the reader see the transition from description of Option L to description that applies to all of the options.
- C-008-066 | • 11, bulleted list Would the second and third items in the phased implementation bulleted list be built at the same time? The map on page 12 shows both the Portage Bay Area and the West Approach Area as Priority 2. This would affect the intensity and the extent of construction effects.
- C-008-067 | • 11, last para Can “structures” be collectively called a “scenario”? Should say “The phased replacements of vulnerable structures are collectively referred to as the Phased Implementation scenario”?
- C-008-068 | **Regulatory Context p. 17**
 - 17, first para Mention “mitigate” along with “avoid or reduce” as in the last para on this page (“avoid, minimize, or mitigate”), and explain, per our earlier request, the technical meanings of these three terms with examples.
- C-008-069 | • 18, first para, first full sentence (next to last sentence of first para) Include “view sheds” in the list of kinds of historic resources that can experience adverse effects. (And “visual effects” to any discussion of the kinds of effects that might be experienced by historic resources.) The project will affect view sheds that are historic, particularly from the Roanoke Park Historic District, whose period of greatest development was 1908 through 1912, with its views of the grounds and surrounding water, forests, and mountains in the year leading up to, the year during (1909), and the years immediately after the Alaska-Yukon-Pacific Exposition. The Roanoke Park Historic District and the Portage Bay neighborhood are still known for these views, which contribute a great deal to the setting and feeling and the desirability of the predominately single-family historic homes in these neighborhoods.
- C-008-070 | • 18, second para, first three sentences The writer said that the fact that the present historic SR 520 bridge is a SEPA-protected Scenic Highway with a significant view shed including Mt. Rainier has nothing to do with Section 106 negotiations. The historic present bridge is already said to experience an adverse effect from its prospective demolition, and the noise walls designed into Option A’s new seven-lane bridge and Option L’s six-lane bridge would adversely affect this view shed, which includes Mt. Rainier and other snow-topped Cascade Mountains and which has been enjoyed by drivers over the present historic bridge since its opening in 1963. Although bicyclers and walkers have never had access to the viewshed from the bridge, bicyclers and walkers across the new SR 520 bridge would be deprived by massive noise walls of this spectacular view shed as well.
- C-008-071 | • The number of historic resources in the Roanoke Park Historic District that enjoy such views, described as “expansive” and of “high vividness” (2005 *Visual Quality and Aesthetics Discipline Report*), of the University of Washington campus, Portage Bay, the historic Montlake Cut, the

district of any other notable buildings or historic properties.

The noise analysis of the Preferred Alternative for the Final EIS demonstrates that noise in the Portage Bay area would achieve adequate reduction from the 10th Avenue East and Delmar Drive East lid, the use of noise-absorptive traffic barriers, and the reduced speed limit on the Portage Bay Bridge. Noise walls are not recommended for the Portage Bay Bridge with the Preferred Alternative because the walls would not satisfy the WSDOT feasibility criteria. To help with design sensitivity, aesthetic treatment would be applied to the bridge.

The design of the new bascule bridge would be context sensitive to minimize the extent to which it alters the setting and view of the historic Carl F. Gould Montlake Bridge. Stipulations are provided in the Programmatic Agreement (Attachment 9 to the Final EIS) to ensure that the proximity of the new bascule bridge would not diminish the integrity of the historic Montlake Bridge.

C-008-026

Currently, 24 residences in the Roanoke/Portage Bay area exceed the FHWA noise abatement criteria (NAC). Under the Preferred Alternative, noise levels would be lower than existing conditions, and only 14 residences in the Roanoke/Portage Bay area would exceed the NAC. Overall, the noise levels with Preferred Alternative would be lower than those of the No-Build Alternative.

Noise levels in the Seattle segment of the project would be minimized using a number of noise reduction strategies, including 4-foot concrete traffic barriers with noise-absorptive coating, noise absorptive materials around lid portals, and a reduced speed limit on the Portable Bay Bridge.

C-008-027

No negative air quality effects are expected from the operation of the Preferred Alternative because it would result in lower emissions than

- C-008-071** | historic Montlake Bridge, the historic Seattle Yacht Club and marina, the historic NOAA Fisheries Building, Lake Washington, the lights of Kirkland and Bellevue, the treed hills beyond, and the Cascade Mountains, is understated in the report. These views have been largely unchanged since well before 1972, the cutoff date for consideration of historic resources.
- C-008-072** |
- As we will enumerate later in these comments, more Roanoke Park Historic District properties than the report indicates (saying “a few”) and many Roanoke Park Historic District contributing and individually eligible properties, which status the report doesn’t mention in its Roanoke Park Historic District effects findings, enjoy these historic views. These contributing and individually eligible resources would be adversely affected by the seven-and-a-half-year to eight-year construction project’s visual blight, disruption, diesel pollution, noise, vibration, damage to buildings and landscaping from air pollution and vibration, dusty windows, and nighttime glare. Many historic contributing and individually eligible properties on steep hillsides on the east and north sides of the historic district and unsurveyed resources on steep hillsides on both the north and south sides of Delmar Drive East in the Portage Bay neighborhood already experiencing periodic landslides will be vulnerable to the increased vibration from demolition and construction.
- C-008-073** |
- From operation, the increased width and height, also moved north, of both the wider Portage Bay Bridge and the wider floating span in front of views from the district in all options would be an adverse effect. These operation effects on the views so characteristic of the Roanoke Park Historic District and the Portage Bay neighborhood, along with increased traffic noise and traffic emissions, damage to buildings (erosion and soiling from increased air pollution, vibration damage, and landslides), dusty windows, and damage to landscaping from air pollution and vibration, would affect the setting and feeling and therefore the desirability of heretofore single-family historic properties in the Roanoke Park Historic District and would be adverse effects of the project. Historic, architect-designed resources in the Portage Bay neighborhood, some of which have not been surveyed and included in the Area of Potential Effects (on hillsides on both sides of Delmar Drive East, in the houseboat community, and on both sides of Fuhrman-Boyer Avenue East) and the individually eligible Gunby, Alden Mason, and Kelley houses would also be adversely affected by the increased width and height, moved north, of the Portage Bay Bridge.
- C-008-074** |
- Traffic on the current bridge has produced mild tremors in the houses closest to the freeway for years. More traffic, moved closer, will exacerbate this effect. We would not agree with a finding such as “There is already a tremor there, so more would not be an adverse effect.” (See “There is already a bridge there”(pp 174, 175, 186). The concept of a literal tipping point is more appropriate to this kind of judgment. Note that the Portage Bay neighborhood experienced landslides during construction of the present bridge back in the 1960s and that residences on the north side of Delmar Drive East including houses designed by Arthur Loveless, Paul Thiry, and Roland Terry (unsurveyed and not included in the *CRDR*) have experienced landslides in recent years.
- C-008-075** |
- Demolition, construction, and operation of Option A’s seven-lane Portage Bay Bridge would have an especially egregious effect on views from many of the district’s contributing and individually eligible properties. So would construction and operation of Option A’s second bascule bridge adversely affect watery views of the exquisite Carl F. Gould Montlake bascule bridge from many contributing and individually eligible historic single-family properties of the Roanoke Park Historic District and in the Portage Bay neighborhood. (See the discussion later in these Formal Comments of the under-representation of the number of properties that currently enjoy these views in the Potential Effects of the Project section of the *Cultural Resources Discipline Report*.)
- C-008-076** | *Historic Context p. 21*
- 32, last paragraph, third sentence from end of para Should refer to the establishment of “Roanoke Park,” not “Interlaken Park,” which was established in the 1890s and over many years, although its western terminus, Bagley Viewpoint, might have been established around 1908. Check Don Sherwood’s history for Interlaken Park and Bagley Viewpoint, where the two are treated

current conditions. For a more detailed discussion, please see the Air Quality Discipline Report Addendum (Attachment 7 to the Final EIS).

C-008-028

Landslide risk from vibration associated with operation of the project is not expected in the historic district. The risk of vibration-induced landslides in the glacially overconsolidated silt and clay is relatively low because the magnitude of soil deformation is quite small, too small to shear the soil and cause loss of strength. Because of the relatively low permeability, construction vibrations are also unlikely to result in loss of strength in the landslide deposits. Throughout construction, WSDOT will monitor vibration at sensitive locations and will take measures to minimize potential effects.

After construction is complete, long-term slope stability could be increased in some areas where project construction has occurred. Please see page 57 of the Geology and Soils Discipline Report. Also see the response to C-008-022, which states that no landslides are expected from the project.

C-008-029

Please see the response to Comment C-008-024, which states that NEPA avoids speculative conclusions.

C-008-030

The federal regulations implementing NEPA define cumulative effects as follows: “Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time” (40

- C-008-076** | separately. The Roanoke Park land was acquired by the Parks Department in 1908, and the park was established in 1910.
- C-008-077** |
- 44, first para, first sentence WSDOT did not reach out to owners of individually eligible residential properties outside historic districts as potential consulting parties. Unless their local governments initiated representation of these owners (which the Portage Bay/Roanoke Park Community Council did upon a belated realization that these owners had not been contacted by WSDOT), they went without representation in Section 106 negotiations.
- C-008-078** |
- Nor did the WSDOT consultants identify all of the eligible historic resources in the Portage Bay neighborhood that might be adversely affected by the project, including architected residences by Arthur Loveless, Paul Thiry, and Roland Terry along the north side of Delmar Drive East, architected residences along the south hillside of Delmar Drive East, resources in the houseboat community in northwest Portage Bay, and historic residences along the east and west sides of Fuhrman-Boyer Avenue East. In addition, the commercial Anhalt Building still intact at the intersection of Eastlake Avenue East and Fuhrman-Boyer East will be doubly stressed by hauling for the project along both arterials and has not been included in the survey of eligible historic resources.
- C-008-079** |
- 44, first para, reference to Historic Property Inventory Forms (HPIFs) Mention Attachment 3 as the location of revised or added HPIFs and Attachment 4 as the location of nomination forms for already listed historic resources.
- C-008-080** |
- 44, last para These figures for historic resources in the Seattle segment seem low (eight properties listed in the NRHP) unless districts (misleadingly as elsewhere) are counted as one property and thus diminish the reader's impression of the number and breadth of historic resources in the APE. Include language such as "including the 80 contributing properties, of which 57 properties are individually eligible for listing, in the Roanoke Park Historic District." Again, the sheer number of historic resources in the APE, in such a small setting, calls for a delicate touch.
 - 49, first para and bulleted list under Built Environmental Resources head Again "eight properties in the Seattle segment listed in the NRHP" minimizes the actual number of Seattle segment historic properties by treating the 101 property district, of which 80 are contributing properties and 57 are individually eligible properties, as one property. We repeat that the large number of historic resources in the Seattle segment calls for an especially careful approach to design, construction, and operation of such a large project in such a small setting.
 - 49, first bulleted item Note that of the 101 properties in the Roanoke Park Historic district, 80 are contributing properties and that of these, 57 are individually eligible. Again, treating an entire district as one property does not convey the large number of historic resources in the Seattle segment.
- C-008-081** |
- 49, second bulleted item The name of the house in the National Register and the Washington Heritage Register is the William H. Parsons House. As a Seattle City Landmark, it is the Harvard Mansion. Note, too, that this thrice-time individually listed historic resource is in the listed Roanoke Park Historic District—that is, does not stand alone as the following items do.
- C-008-082** |
- Methodology, p. 53*
- 55, bulleted list The examples should indicate which of the three kinds of adverse effect each is as this is where text is explaining at least what an indirect effect is. The other two kinds, direct and cumulative, should have been explained on the preceding and/or on this page, too, with helpful examples.
- C-008-083** |
- 55, first para after bulleted list, second sentence Say "and the two six-lane alternatives and one seven-lane alternative." (WSDOT used to describe Option A as "the seven-lane alternative." If

CFR 1508.7; emphasis added). For clarification, please note that WSDOT does not refuse to engage in cumulative effects findings. Such findings were presented in the DEIS and SDEIS and are presented in the Final EIS. Jurisdictional considerations apply only to the feasibility of mitigating cumulative effects, not to their assessment.

It is necessary, and consistent with federal guidance, to consider the effects of past actions along with the effects of other present and reasonably foreseeable future actions, possibly including other WSDOT projects, in a cumulative effects assessment. The cumulative effects assessments presented in the DEIS, SDEIS, and Final EIS do take past actions into account, including previous State of Washington transportation improvement projects. The history of activity in the project area and the central Puget Sound region formed the context within which the assessments of cumulative effects on specific resources were conducted.

Through the Section 106 consultation process, WSDOT has worked with Section 106 consulting parties to develop a Programmatic Agreement (Attachment 9 to the Final EIS) that would resolve the adverse effect from the project.

C-008-031

The Roanoke Park/Portage Bay Community Council representatives were provided an additional review and of the revised draft of the 2009 Cultural Resources report, followed by the meeting mentioned. Both actions were special actions provided during a very limited schedule for development of the document. The Section 106 consulting parties were given in excess of 30 days to review and comment on the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS). WSDOT then had approximately two weeks to review and incorporate comments and make corrections.

Section 106 consulting parties also had the opportunity to engage in

C-008-083

WSDOT no longer describes Option A as the seven-lane alternative, use the clunky “and one six lane alternative with an auxiliary lane on the Portage Bay Bridge,” which is WSDOT’s most recent description of Option A.

C-008-084

- 55, first para after bulleted list Delete the third and fourth sentences. For clarity because the passage might be understood in this sense, and if this passage were meant to justify describing the features of the three options in these two areas only once, the sentence might say, “Although the different options may have different effects on historic resources in the areas near the I-5 and SR 520 interchange and between I-5 and the Portage Bay Bridge, the features of the project in these areas are the same in each of the options.” Saying “so the analysis of effects in these areas is discussed only once” cannot be justified. And this section of the Methodology chapter is entitled “Effects Analysis,” not “Feature Description.” That the features of the three options within these areas are the same does not mean that the three options would not have differing potential effects on these areas. This blanket dismissal via faulty reasoning of the differing effects of the three options on the area between I-5 and Portage Bay has led to a deceptive minimization of adverse effects.
 - The construction and operation effects of the different options—say, view impediment or noise, erosion and soiling from air pollution—on the historic resources in the area between I-5 and the Portage Bay Bridge, on the Roanoke Park Historic District, for instance, or on the historic resources in the Portage Bay neighborhood, are quite different and will require at least three discussions, of each option’s effects on each area.
 - The construction and operation of the seven-lane Portage Bay Bridge in Option A would have a different effect on views, noise, and air quality in the Roanoke Park Historic District and on views, noise, and air quality in the Portage Bay neighborhood than construction and operation of the six-lane Portage Bay Bridge of Options K and L would.
 - The operation of Option A’s second bascule bridge would have a different effect on views of the historic Carl F. Gould Montlake Bridge from the Roanoke Park Historic District and from historic resources in the Portage Bay neighborhood than the invisible tunnel of Option K or the bascule bridge farther east and out of sight of Option L would.
 - Option K’s depressed profile would affect views from these areas differently than Option L’s elevated profile would affect views from the areas.
- Delete this recently added text that fails to justify not treating the differing effects of the three options on the areas of the project between I-5 and Portage Bay, and treat the differing effects of all three options on the Roanoke Park Historic District and historic properties in the other areas between I-5 and Portage Bay under the “Option A,” “Option K,” and “Option L” heads as is done for the areas in the APE east of Portage Bay in the “Potential Effects of the Project” section and in other sections of the text where construction and operation effects on these areas are discussed or summarized under the individual option heads.

C-008-085

- 55, last para “Examples of mitigation” Having seen the term in the *Cultural Resources Discipline Report*, we inquired in an earlier meeting with WSDOT consultants whether there was such a thing as “compensatory mitigation.” The writer said, “No.” Include “compensatory mitigation,” and provide an example in the list here of possible mitigations since it is offered as a kind of mitigation by that name later in the text (p 192).

C-008-086

Historic Resources in the Study Area p. 57

- 62, first para under “Historic Built Environment Properties in the Seattle Study Area” head Say “In the Seattle study area, there are eight properties listed in the NRHP, **including the 101 properties of the Roanoke Park Historic District, of which 80 are contributing resources**

more than two months of negotiations with WSDOT/FHWA on the Programmatic Agreement (Attachment 9 to the Final EIS). This process allowed the consulting parties to express concerns, comment on progress, and work toward a mutual agreement.

WSDOT continues to work in good faith with the Section 106 consulting parties while respecting the project schedule directed by the Legislature and the Governor.

C-008-032

The comments on the Cultural Resources Discipline Report were reviewed and addressed on a case-by-case basis.

C-008-033

The Cultural Resources Discipline Report passed through a number of review phases before being published as part of the SDEIS. Incorrect statements of fact or errors in that discipline report have been addressed and those corrections have been included, where applicable, in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

The landscapes of the Portage Bay/Roanoke Park neighborhood were discussed in the Visual Quality and Aesthetics Discipline Report. The difference in the effects analysis from the 2005 Visual Quality and Aesthetics Discipline Report to the 2010 version results from different options being presented in each report as the project evolved, which would cause differing effects on visual quality.

C-008-034

Please see the response to Comment C-008-031, which discusses the extended comment period granted for the Final Cultural Resources Assessment and Discipline Report review.

C-008-086

and 57 are individually eligible for listing. This will convey a more accurate impression of the number of listed properties in the Seattle study area.

C-008-087

- 64-68 “Exhibit 13. Previously Identified Historic Properties in the Seattle Segment” (Exhibit 12 in the 11/16/2009 draft) and “Exhibit 15. Summary of NRHP-Eligible Properties Identified in the Seattle Segment” (Exhibit 13 in the 11/16/2009 draft) should have comparable column heads and contain comparably full treatments of the historic properties.
 - The full description of the Montlake Historic District location in Exhibit 15 under the column head “Street Address/Location” should be balanced by an equally full description of the Roanoke Park Historic District location under that column head (“Roughly bounded by . . .”) in Exhibit 13.
 - A “Property Name” column should be included in Exhibit 13 as in Exhibit 15.
 - The “Period of Significance 1905 to 1952” for the Montlake Historic District in Exhibit 153 under the column head “Date of Construction” should be matched by an equally informative “Period of Significance 1899 to 1939” for the Roanoke Park Historic District under the column of that name in Exhibit 13.
 - The discussion of the Montlake Historic District under “NRHP Eligibility” that discloses the criterion (C) under which the Montlake Historic District is NRHP eligible and includes a second paragraph describing the total number of properties in the Montlake Historic District, the total number of contributing properties in the Montlake Historic District, the number of individually eligible properties in the Montlake Historic District, and the number of non-contributing properties in the Montlake Historic District should be matched by an equally informative two paragraphs covering those two kinds of information (Criteria A and C; 101 properties, 80 contributing properties, 57 individually eligible properties, 21 non-contributing properties) under the column head “Listed Status” for the Roanoke Park Historic District.
 - Note that the NRHP- and WHR-listed and City Landmark-designated William H. Parsons House (called the Harvard Mansion as a City Landmark) in Exhibit 13 is in the Roanoke Park Historic District.

C-008-088

In response to our request that these changes be made to Exhibit 13 (then Exhibit 12), the writer instead mistakenly inserted the **listed** Roanoke Park Historic District entry into Exhibit 15’s table of **eligible** historic resources. This mistake needs to be undone, and Exhibit 13 needs to be as informative along the lines mentioned above as Exhibit 15 is. Note, too, that the location of the Roanoke Park Historic District as described in the table “on the northeast side of the intersection of I-5 and SR 520” is inaccurate. That intersection is in the North Capitol Hill neighborhood. The “roughly bounded by” description we recommended in our earlier comment, along the lines of the “roughly bounded by” description of the Montlake Historic District in Exhibit 15’s Street Address/Location column would be accurate: “Roughly bounded by East Roanoke Street, Harvard Avenue East, East Shelby Street, and 10th Avenue East” would be accurate geographically and also do a better job of conveying the single-family residential character of the district than describing it as “on the northeast side of the intersection of I-5 and SR 520” does.

Such treatment seems to be in accord with a widespread depiction in the *CRDR* of the Roanoke Park Historic District as so afflicted, so damaged already, that “no adverse effects” findings can arise out of reasoning such as the notorious “there is already a bridge there, so a replacement bridge would not be an adverse effect.” By means of a lot of work on the part of its residents in cooperation with the City’s Department of Parks and Recreation, Department of Neighborhoods, SDOT, and other agencies, the Roanoke Park Historic District is a remarkably cohesive single-family residential historic district. Its setting and feeling and its characteristic use are intact. A lessening of these characteristics would result in secondary (indirect), multiple (collective), and cumulative adverse effects.

C-008-035

The Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) rectifies all relevant factual errors and includes clarifications based on public and agency comments received during the comment period for the SDEIS. It also includes an analysis of the Preferred Alternative’s potential effects on historic properties within the APE.

The Section 106 consulting parties had in excess of 30 days to review the draft of this document.

C-008-036

The exhibits have been revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-037

The layout has been revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-038

The Section 4(f) regulations (23 CFR 774) require that FHWA and WSDOT consult with the “officials with jurisdiction” over the Section 4(f) resources. In the case of historic resources, the official with jurisdiction is the SHPO. In the case of parks and recreational facilities, “the official(s) with jurisdiction are the official(s) of the agency or agencies that own or administer the property in question and who are empowered to represent the agency on matters related to the property” (23 CFR 774.17). In the SR 520 project area, these officials are the Seattle Parks and Recreation Department and the University of Washington.

Officials with jurisdiction are provided the opportunity to review and comment on the Section 4(f) evaluation in its draft form. The Portage

C-008-089

- 81, subhead under “Roanoke Park Historic District” The subhead should say “**Listed** under Criteria A and C,” not “Eligible under Criteria A and C.”
- 81, first sentence The subject of the sentence is “**The** Roanoke Park Historic District . . .” Again, delete the unattractive new description of the Roanoke Park Historic District as “located on the northeast side of the intersection of SR 520 and I-5.” The original, now second sentence, of the paragraph describes the location of the Roanoke Park Historic District accurately and as it is described in its nomination: “Roughly bounded by East Roanoke Street, Harvard Avenue East, East Shelby Street, and 10th Avenue East . . .” This description conveys the single-family residential integrity of the Roanoke Park Historic District. Say “**the William H. Parsons House (the Harvard Mansion as a City Landmark).**”
- 81, first para, third sentence Say “The National Register nomination form **for the Roanoke Park Historic District**” to prevent confusion that the nomination form for the immediately preceding referent, the William H. Parsons House, is meant. Make it easy for the reader to find the nomination by means of a finer description of its location: Vol 4, Attachment 4, Parts 6 and 7.

We have verified that the entire nomination form for the Roanoke Park Historic District is now included in Vol 4, Attachment 4, Parts 6 and 7. However, a layout problem with the nomination photos and their descriptions in Part 7 ripples through the entire sequence of photos so that, for instance, the photo of the Storm house is identified on its page as the Mayor Ole Hanson House, the photo of the Neterer House is identified on its page as the Storm House, the photo of the William H. Parsons House (the Harvard Mansion) is identified on its page as the King-Friedman House, and so on through the entire sequence of black and white photos. Please fix this series of mistakes.

- 81, third full para Although introduced by “According to the nomination,” the beginning of the following text repeats the mistake that the RPHD is “eligible for listing” rather than up-to-date information from the NRHP nomination. This statement does not come from the nomination, as we pointed out in several reviews of the *CRDR*. The Roanoke Park Historic District is no longer “eligible for listing” but is listed.
- 87, Exhibit 16. We had asked for greater contrast between contributing and non-contributing properties on the map so that the difference will show up better in black and white printouts. We look forward to seeing this revision of the exhibit, which was not accomplished in time for the *SDEIS* release.
- 88, fifth full paragraph The Roanoke Park Historic District is not “**eligible** for listing under Criterion A.” The Roanoke Park Historic District has been **listed** in the National Register and the Washington Heritage Register on the basis of Criterion A **as well as Criterion C**.

C-008-090

Such misleading mistakes have dogged descriptions of and effects findings with respect to the Roanoke Park Historic District in the successive drafts of the *CRDR*. We would like to trust that careless mistakes of this nature and more significant misrepresentations will be corrected in the version of the *CRDR* that goes into the *FEIS*.

C-008-091

- 89–90 bulleted list of architects. The list takes up a whole line for each name—a lot of space used up for no good reason—and could be run-in as a short paragraph. We appreciate the writer’s additional research on Harry W. Kent and the Kenworth trucking company, but the description in the *CRDR* of the Roanoke Park Historic District scants important events and patterns associated with the district—early Seattle history writing, early significant judicial decisions, early and distinguished journalism. With the extra space, a much better account of the district’s significance could be provided first.

C-008-092

- The end of the sentence about Louisa Boren Denny, midway through the last para on p 88, would be a good place for a new paragraph about the many other prominent Dennys

Bay/Roanoke Park Community Council is does not, by the above definition, have jurisdiction over any of the Section 4(f) properties potentially affected by this project, and hence is not included in the circulation of draft Section 4(f) documents to officials with jurisdiction. The Portage Bay/Roanoke Park Community Council had an opportunity to comment on the Section 4(f) evaluation as part of the SDEIS comment period.

C-008-039

Please see the response to Comment C-008-031. Section 106 consulting parties also had the opportunity to engage in more than two months of negotiations with WSDOT/FHWA on the Programmatic Agreement (Attachment 9 to the Final EIS). This process allowed the consulting parties to express concerns, comment on progress, and work toward a mutual agreement.

C-008-040

WSDOT has reviewed all comments submitted during the public comment period and has evaluated the comments and concerns at many different levels. The comments and concerns that were relevant to the project, helped to clarify misunderstanding, or were based on errors in the SDEIS documents helped to shape the Final EIS.

C-008-041

Section 106 consulting parties were given in excess of 30 days to review and comment on the Cultural Resources Assessment and Discipline Report. At the culmination of this review period, in continuing coordination, WSDOT invited the consulting parties to discuss measures to resolve the project’s adverse effect and to participate in the development and review of the Programmatic Agreement.

See the response to Comment C-008-038 regarding opportunity to

C-008-092

who lived in the district and to mention that many of these Dennys wrote the early histories of Seattle.

- o Louisa Boren and David T. Denny's eldest child, Emily Inez Denny, who wrote *Blazing the Way* (1909), lived in the district with her mother and the family of her youngest brother, Victor W. S. Denny, a miner and assayer of gold and silver. Arthur and Mary Ann Boren Denny's granddaughters Sophie Frye Bass, who wrote *Pig-Tail Days in Old Seattle* (1937) and *When Seattle was a Village* (1947), also an archivist of note after whom the library at MOHAI was named, and Roberta Frye Watt, who wrote *Four Wagons West* (1931), daughters of Arthur and Mary Ann's eldest child, Louisa Denny Frye, lived in the district, too. (See the Elmer E. Green-designed Gates-Bass Mansion, A and C, 1909, in Exhibit 16.) Their younger sister Elizabeth Frye Bogue and her husband, Virgil Bogue, author during the City Beautiful movement of the *Seattle Comprehensive Plan* of 1911 and longtime collaborator of the Olmsted brothers, also lived in the district. (Interestingly, engineer Virgil Bogue proposed a tunnel under Lake Washington to connect the west side and the east side.) Their cousin Mabel Denny Thompson, daughter of Arthur and Mary Ann Boren Denny's oldest son, Orion Orville ("Double O" to the nieces and nephews), also lived in the neighborhood.
- o The account of the Dennys could be followed by a new paragraph in which the Bernice Stern, Alice Franklin Bryant, and Jean Ross material could be used.
- o This account of other notable women from the district could be followed by a paragraph on the distinguished superior court judge Jeremiah Neterer, who lived in a contributing and individually eligible house (A and C, Andrew Willatsen, 1915) in the district and presided over many landmark cases of the day, including the bootlegger Roy Olmstead's [this the correct spelling] trial that involved an early decision on the admissibility of evidence gained by wiretapping and the long-running legal disputes between private power owners Stone & Webster vs. public power advocate J. D. Ross. Many of the neighborhood's attorneys took part in these cases, on both sides. Neterer also presided over early union disputes that involved his neighbor across the alley in a contributing and individually eligible house (A and C, Frederick A. Sexton, 1908), U. S. Attorney Robert C. Saunders.
- o [New paragraph] Mayor Ole Hanson and his elected successor, Hugh M. Caldwell, both lived in the district, in contributing historic houses, and were both caught up in the Stone & Webster disputes and court cases.
- o The Harry W. Kent paragraph could follow then. If it had to be shorter, that would be all right. The information on the Dennys, the women, and the Honorable Jeremiah Neterer is of greater significance.
- o Also of great interest is that Samuel L. Crawford, who founded the *Intelligencer* newspaper and stayed on as editor after its merger with the *Post* to create the *Post-Intelligencer*, at the time of its demise last year the oldest newspaper in the city, also lived in the district, along with William A. Prosser, news editor of the *Post-Intelligencer*. Ed Guthman, the Pulitzer-Prize winning journalist whose investigative reporting led to the exoneration of Melvin Rader and other members of the University of Washington faculty accused of Communist conspiracy by the Cantwell Committee, grew up in the district.

C-008-093

- 89, third para Should say "Also **listed** on the basis of Criterion C," not "Also eligible under Criterion C."

C-008-094

- 89-90 Run the names of the architects into the paragraph, after the colon, with their names simply separated by commas. That will leave more space for the suggested material above that points to

comment of the Section 4(f) Evaluation.

WSDOT has reached out to the Eastlake Community Council and to the North Capitol Hill Neighborhood Association. The Eastlake Community Council formally accepted WSDOT's invitation to become a Section 106 consulting party on April 1, 2009. The North Capitol Hill Neighborhood Association accepted WSDOT's invitation to become a Section 106 consulting party on July 28, 2010.

WSDOT has also increased communication with the Section 106 consulting parties, and met with them on a number of occasions throughout 2010 and 2011. The meetings helped to establish frequent contact with and engage the Section 106 consulting parties in the Section 106 process.

C-008-042

Since the SDEIS was published, WSDOT has increased the number of qualified staff members working in the Cultural Resources division for this project.

C-008-043

When an agency begins the Section 106 process, the first step is to initiate consultation with the Washington State Department of Archaeology and Historic Preservation (DAHP). WSDOT followed this step. DAHP became a Section 106 consulting party to this project more than a decade ago, at the beginning of the Trans-Lake Washington Study. WSDOT reinitiated consultation with DAHP when the SR 520, I-5 to Medina project became a subproject of the overall SR 520 program.

Because of the number of historic properties within the APE and the complexity of consulting party concerns, WSDOT also sought the guidance of the Advisory Council on Historic Preservation (ACHP). WSDOT took this step on its own accord. The ACHP is an independent

- C-008-094** | the significance of the Roanoke Park Historic District on the basis of both Criterion A and Criterion C.
- C-008-095** |
- 91, para beginning “In addition to the elms in the park,” add “in its southern curb beds” to the end of the last sentence. This is important because a haul route along the southern curb beds, with possible adverse effects from fugitive dust and emissions and from vibration to the mature trees that characterize the district, has been identified. These trees in the south of the district also buffer the historic resources in the district from some of the effects of SR 520. They do not, as alleged later in this report, interfere with the panoramic, memorable views of high vividness east from many, not “a few,” historic resources (34 houses in all, 31 of 80 contributing resources, and 26 of 57 individually eligible resources) in the Roanoke Park Historic District.
- C-008-096** |
- 92, first para After the first sentence, observe that the contributing Elmer E. Green–designed Gates-Bass Mansion (1909) shown in Exhibit 17 is also eligible for individual listing on the basis of Criterion A and Criterion C. It was designed by Elmer E. Green (1909) and was the home of Denny history writers Sophie Frye Bass and Roberta Frye Watt. (As is done p 94, under the two photos, for Exhibits 20 and 21, which show historic properties in the Montlake Historic District eligible for listing under Criterion C.) It is one of the more ornate . . .” “The Betterton-Hillman House at 2601 Broadway Avenue East and its twin next door, the Mayor Ole Hanson House at 2609 Broadway Avenue East, both designed by Elmer E. Green, are substantial residences with . . .” What a shame that only Elmer E. Green houses are shown. One of the two Huntington and Gould houses or one of the two Frederick A. Sexton houses, or one of the two Edwin J. Ivey houses could have conveyed what an architecturally important collection of houses is contained in the roughly 9 blocks of the Roanoke Park Historic District. The account of the Roanoke Park Historic District in even this fourth iteration, released for the SDEIS, has not been done with care.
- C-008-097** | **Potential Effects of the Project, Construction p 135**
- What would be the effects on congestion of variable tolling in the No-Build Alternative—that is, effectively what will happen if the variable tolling project does go into operation in spring 2011 before construction, and what would be the effects on congestion of tolling of SR-520 alone and tolling of both SR 520 and I-90?
- C-008-098** |
- 135, Delete the out of date “6-Lane Alternative” head, and treat the area between I-5 and Portage Bay under the three “Option A” (141) “Option K” (149), and “Option L” (160) heads.
 - Use a bulleted list similar to the one on p 147 for multiple construction effects of Option A on the Montlake Historic District to itemize the multiple construction effects on the Roanoke Park Historic District and the historic resources in the Portage Bay neighborhood of Option A. (See our summary of effects pp 5–6.)
 - Use a bulleted list similar to the one on p 157 for multiple construction effects of Option K on the Montlake Historic District to itemize the multiple construction effects on the Roanoke Park Historic District and the historic resources in the Portage Bay neighborhood of Option K.
 - Use a bulleted list similar to the one on p 166 for multiple construction effects of Option L on the Montlake Historic District to itemize the multiple construction effects on the Roanoke Park Historic District and the historic resources in the Portage Bay neighborhood of Option K.
- C-008-099** |
- 135, para under “6-Lane Alternative” head (which should be deleted) The first sentence of the paragraph says, “This section discusses potential construction effects and notes all known effects from the project on historic properties.” The paragraph goes on to qualify its construction effects judgments and to indicate as before that they are preliminary. This pattern of making a statement and then qualifying it is confusing. Let the reader know immediately of the preliminary nature of

federal agency that promotes the preservation, enhancement, and productive use of our nation’s historic resources and advises the President and Congress on national historic preservation policy. The ACHP agreed to participate in the Section 106 process for the project in July 2010.

C-008-044

"Several" has been changed to "many" in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-045

WSDOT has addressed this language on a case-by-case basis throughout the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS). For most of these instances, “slightly” and “minor” have been changed and the wording has been updated to accommodate the request. However, WSDOT did not change “not substantially” or “not substantial” because these terms are directly related to the effects findings and are required by NEPA.

C-008-046

The Executive Summary of the Cultural Resources Discipline Report stated that the Roanoke Park Historic District is composed of 101 properties, 80 of which are contributing resources to the district. This has been updated for the next iteration, throughout the report, where appropriate.

The Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) does not discuss the 57 properties that the Portage Bay/Roanoke Park Community Council suggests are individually eligible historic resources. Because the Roanoke Park Historic District was already listed in the National Register of Historic Places (NRHP) in 2009, with note of its 80 contributing resources,

C-008-099	<p>construction effects findings in this iteration of the <i>Cultural Resources Discipline Report</i>. Something such as, "This section discusses preliminary identifications of potential adverse construction effects from the project on historic properties. Effects findings here will be finalized only with the concurrence of the State Historic Preservation Officer (SHPO)."</p>
C-008-100	<ul style="list-style-type: none"> 135, para under "6-Lane Alternative" head, second sentence Says the effects will be thoroughly analyzed before publication of the <i>FEIS</i>. Having not had enough review time and meeting time to discuss with WSDOT consultants their analyses of effects before publication of the <i>SDEIS</i>, we ask that explicit provision for post analysis discussion with consulting parties and proposals for avoidance, minimization, and mitigation be discussed with consulting parties and entered into a Memorandum of Agreement before publication of the <i>FEIS</i>.
C-008-101	<ul style="list-style-type: none"> 135, para under "6-Lane Alternative" head (which should be deleted) The faulty reasoning in earlier statements in the Methodology section about effects analysis (p 55) is repeated: "As noted in the Methodology Section [no initial cap on "section"], for the area near the I-5 and SR 520 interchange, and between I-5 and the Portage Bay bridge [the earlier version of this rationale said "between I-5 and Portage Bay"], the project is [features are] the same under each option, so the analysis of effects is discussed here only once." This faulty reasoning cannot justify the absence of discussion of effects and the different effects of each of the three options on the area between I-5 and the Portage Bay Bridge. The three options will have differing effects on views, noise, vibration, nighttime glare, and air quality in this area, for instance, during demolition and construction. Delete the two sentences. Because the report says that less is known of demolition and construction details in the area near the I-5 and SR 520 interchange, treat the two areas, the area near the I-5 and SR 520 interchange and the area between I-5 and Portage Bay, separately. If more is known about the design and construction plans of the I-5 and SR 520 interchange before the publication of the <i>FEIS</i> (and more should be known by then) and if WSDOT is still treating the three options by then (let's hope not!), include that information in the three sections devoted to Option A (147), Option K (157), and Option L (166).
C-008-102	<p style="text-align: center;">I-5 and SR 520 Interchange, Construction, Options A, K, and L</p> <ul style="list-style-type: none"> 135, under the "Historic Built Environment" head Of the area near the I-5 and SR 520 interchange, say something to the effect of "The redesign, demolition, and construction of the SR 520 and I-5 HOV ramp and interchange is likely to have an adverse effect on the eligible Chung House at 1980 Harvard Avenue East (C, 1932) and possibly on the eligible Talder House (C, 1909) at 2352 Broadway Avenue East. When demolition and construction details are known, possible effects of demolition and construction (and effects of operation in the operation section of this chapter) of this part of the project on historic resources will be more fully evaluated. If the SHPO concurs, avoidance, minimization, and mitigation measures will be proposed in a Memorandum of Agreement."
C-008-103	<ul style="list-style-type: none"> 135, Move the material from pp 135 last para to 141 first para into appropriate sections: the discussion of the I-5 and SR 520 interchange (above) and the sections devoted to Option A, Option K, and Option L.
C-008-104	<p style="text-align: center;">Area Between I-5 and Portage Bay, Construction, Options A, K, and L</p> <p><i>Construction—Staging, Options A, K, and L</i></p> <ul style="list-style-type: none"> 142, under "Historic Built Environment" head, talk about the taking of the Bagley Viewpoint and construction staging effects there on the Roanoke Park Historic District under Option A. The Bagley Viewpoint is very close, across the street from, the contributing and individually eligible (both Criterion A and Criterion C, Elmer E. Green, 1909) Gates-Bass Mansion at 1018 East

WSDOT is not required to resurvey the resource. WSDOT will remain consistent with the number of contributing resources that were reported in the 2009 NRHP nomination for the Roanoke Park Historic District. The Washington State Department of Archaeology and Historic Preservation has agreed to this approach.

C-008-047

The following recommendations were reviewed and addressed on a case-by-case basis, and changes were made as appropriate.

C-008-048

WSDOT has reviewed the potential effects that the project undertaking could have on the Roanoke Park Historic District. To ensure that the effects on the Roanoke Park Historic District do not diminish the integrity of the characteristics that convey its significance, WSDOT will implement the terms and conditions of the Programmatic Agreement (Attachment 9 to the Final EIS) and Community Construction Management Plan (outlined in Attachment 9 to the Final EIS).

WSDOT worked with the Portage Bay/Roanoke Park Community Council, other Section 106 consulting parties, and other affected community members to develop the Community Construction Management Plan that will help to avoid or minimize construction impacts. The Programmatic Agreement also contains stipulations to facilitate the involvement of the Section 106 consulting parties in the design process, which will help to ensure context-sensitive design and will effectively minimize the project's adverse effect on historic properties.

Further details can be found in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-104

Roanoke Street and the contributing and individually eligible (A, 1907) Booth House at 1004 East Roanoke Street and is close to the contributing and individually eligible Dalley House (C, Huntington & Gould, 1910) at 2608 10th Avenue East. Staging there would also detract from enjoyment of and access to the contributing Roanoke Park itself; and the contributing houses at 2612, 2616, and 2622, 2632, and 2636 10th Avenue East in the Roanoke Park Historic District would experience adverse effects. This staging, with diesel noise and pollution, vibration, nighttime glare, and fugitive dust, would have an adverse effect on at least these 9 contributing historic resources and on the 3 of these 9 contributing resources closest to the staging area that are eligible for individual listing. These staging effects and ways of avoiding, minimizing, or mitigating them should be discussed in a Memorandum of Agreement.

C-008-105

- Speak also to the effects of the taking of land along the front of the individually eligible Fire Station #22.

C-008-106

Construction—Vegetation Removal, Options A, K, and L

- 136, last para, first, second, and third sentences The argument that getting rid of vegetation (50-foot-wide swath along the WSDOT right of way north and south) that has buffered contributing and individually eligible houses in the Roanoke Park Historic District including the contributing and individually eligible Gates-Bass Mansion at 1018 East Roanoke Street, the contributing and individually eligible Booth House at 1004 East Roanoke Street, the contributing and individually eligible Dalley House at 2808 10th Avenue East, and the contributing houses at 2612, 2616, 2622, 2632, and 2636 10th Avenue East along with the contributing Roanoke Park itself, the contributing Betterton-Hillman House at 2601 Broadway Avenue East, the contributing and individually eligible Mayor Ole Hansan House at 2609 Broadway Avenue East, the contributing and individually eligible Storm House at 2611 Broadway Avenue East, the possibly individually eligible Winter house at 2617 Broadway Avenue East (C, 1942) and use of the possibly individually eligible St. Patrick Church (A and C, Krantz & Wrede, 1961) at 815 East Edgar Street, along with the individually eligible Boyd House at 2422 Federal Avenue East, the individually eligible Gunby House (C, John T. Jacobsen, 1940) at 1118 East Roanoke Street on the north and the individually eligible Alden Mason House (A and C, Victor Steinbrueck, 1949) on the south, the individually eligible Fire Station #22 at 901 East Roanoke Street, the individually eligible Keuss Building at 2351 10th Avenue East, the individually eligible Glover Homes Building at 914 East Miller Street, the individually eligible Wicklund-Jarr House at 910 East Miller Street, the individually eligible East Miller Condominium at 904 East Miller Street, and the individually eligible Sagamura House at 2408 Broadway Avenue East from SR 520 provides a good opportunity to get rid of the invasive species that have been smothering splendid stands of mature trees (because WSDOT has failed to deal with the invasives in those areas over many years) is unacceptable, along the lines of “we’ve already blighted it, so it’s OK to get rid of it.” It’s one thing to acknowledge the need to remove buffering vegetation for the sake of the project, another to pretend that this is a good thing.

C-008-107

- Removing mature trees that buffer these 12 contributing resources and St. Patrick Church in the Roanoke Park Historic District including 7 possibly individually eligible resources plus 9 more **individually eligible resources outside the district** that would be exposed to more of the present SR 520’s noise, visual, and air pollution for an unspecified amount of time would be an adverse effect. A Memorandum of Agreement should specify that vegetation removal be delayed as long as possible and remedied as soon as possible after removal.
- The vegetation removal will expose these contributing and individually eligible historic resources in the Roanoke Park Historic District (those identified above and in the Portage Bay and North Capitol Hill neighborhoods) to construction effects of the widening of the SR 520 roadway, the demolition and rebuilding of replacement bridges at East Roanoke Street and 10th Avenue East and Delmar Drive East, the building of the lids at East Roanoke and 10th and Delmar, and the demolition and reconstruction of the Bagley Viewpoint and the Portage Bay Bridge. These effects of vegetation removal and ways of avoiding, minimizing, or mitigating them should be discussed in a Memorandum of Agreement.

C-008-049

Please see the response to Comment C-008-046, which states that the Executive Summary has been updated to clarify the amount of contributing resources within the Roanoke Park Historic District.

C-008-050

The number of properties listed in or eligible for listing in the NRHP has been revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS). For clarity, a table with all individually eligible and contributing properties within the APE has been added.

C-008-051

A revised Executive Summary was written for the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-052

This paragraph has been removed from the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

As explained in the response comment C-008-048, WSDOT determined that the Roanoke Park Historic District’s characteristics of integrity may be altered by construction and operation of the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. However, implementation of the Programmatic Agreement (Attachment 9 to the Final EIS) and the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS) would resolve the adverse effect from the project.

C-008-053

Please see the response to Comment C-008-052, which states that the Roanoke Park Historic District’s characteristics of integrity may be

C-008-108

- 137, top of page Replanting with native plant materials near a freeway, where conditions are most unlike the conditions in which native plant materials thrived 160 years ago, seems like a misguided idea. Hardier choices are appropriate, and the communities would like language in the Memorandum of Agreement to say that they will be consulted on choices of species for both replacement buffering vegetation and lid landscaping.

C-008-109

Construction—Detours, Options A, K, and L

- 137, first full para The last iteration of the *Cultural Resources Discipline Report* proposed a **detour** to and from Fuhrman-Boyer Avenue East up and down 11th Avenue East. This iteration proposes a detour through the Roanoke Park Historic District. Both are objectionable for any length of time, let alone nine months. The 11th Avenue East detour around a steep blind curve would be dangerous for both residents and motorists. A detour through the Roanoke Park Historic District (presently DO NOT ENTER going north on 10th Avenue East and with a traffic diverter in Broadway Avenue East at East Edgar Street—both hard won by the community in order to discourage through traffic—would be dangerous for residents, bicyclists, walkers, and the district’s many young children accustomed to slow moving residential traffic. This would be a substantial change to the setting, feeling, and characteristic use of the historic district. In addition, historic resources in the district would be subject to increased fugitive dust and emissions from idling vehicles and speeding through traffic, noise, vibration, congestion, and erosion and soiling of buildings along with damage to landscaping from air pollution and vibration. Note that in the 2600, 2700, and 2800 blocks of 10th Avenue East and Broadway Avenue East in the district, many residents and visitors to Roanoke Park park their cars on both sides of the relatively narrow streets of the district. These cars would be subject to fugitive dust and emissions and possible damage from traffic traveling at speed through the district. These effects of detours and ways of avoiding, minimizing, or mitigating them should be discussed in a Memorandum of Agreement.

C-008-110

- 137, second full paragraph At Rob Berman’s request a sketch for a more appropriate design for the intersection of 10th Avenue East and East Roanoke Street, the chief gateway to the Roanoke Park Historic District, has been furnished, has met with WSDOT’s approval, and has been passed to the city’s SDOT for evaluation. We would like the Memorandum of Agreement to discuss adopting this plan.

C-008-111

Construction—Temporary Closures and Haul Routes, Options A, K, and L

- 137, second full para **Temporary closures** over a 15-month period that would “restrict access to the four contributing [good to see “contributing” mentioned with respect to the Roanoke Park Historic District in the report, although two of them are individually eligible as well] properties along East Roanoke Street” (1018 and 1004 East Roanoke Street, Roanoke Park and 2601 Broadway Avenue East), would also restrict access to its garage of the contributing house at 2612 10th Avenue East and to their garages of the contributing and individually eligible houses at 2609 and 2611 Broadway Avenue East and of the possibly individually eligible Winter house at 2617 Broadway Avenue East (C, 1942) and to the parking lot of the possibly individually eligible St. Patrick Church (A and C, Krantz & Wrede, 1961) at 815 East Edgar Street. (10 contributing resources among which 8 are possibly individually eligible.)

C-008-112

- 137, last para, Say, “This potential **haul route** along two borders of the Roanoke Park Historic District would adversely affect the setting and feeling of the historic district with increased fugitive dust and diesel emissions, noise, vibration, traffic, congestion, dusty windows, and damage to buildings from erosion and soiling and to landscaping from dust and vibration that would make many contributing and individually eligible historic properties in this part of the Roanoke Park Historic District less desirable as single-family residences.”

C-008-113

- Along Harvard Avenue East, 8 contributing, 1 thrice individually listed, 6 individually eligible and 2 possibly individually eligible historic resources would be adversely affected by this haul route: the contributing and individually eligible Brady-Alexander House (C, 1900—the second oldest house in the historic district) on the northeast corner

altered by construction and operation of the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. However, implementation of the Programmatic Agreement (Attachment 9 to the Final EIS) and the Community Construction Management Plan (Attachment 9 to the Final EIS) would resolve the adverse effect from the project. Additionally, the Roanoke Park Historic District is discussed in the Final Cultural Resources Assessment and Discipline Report, and was evaluated using the same methodology that was used to evaluate the Montlake Historic District.

C-008-054

All historic properties located in the APE are listed or discussed in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS). The Portage Bay neighborhood is not a historic district and, therefore, is not addressed under Section 106 or in the cultural resources documents.

C-008-055

The function of the Executive Summary is to provide an overview of the SR 520, I-5 to Medina: Bridge Replacement and HOV Project main project components and of the cultural resources located in the APE. The construction and transportation of the pontoons, which will eventually become the foundation for the Evergreen Point Floating bridge, is one of the main components of this project and warrants a discussion within the Executive Summary. The justification for mention of the pontoons is in the first paragraph of the Executive Summary, "This report also evaluates effects that might occur from the transport of pontoons that would be used to build the new floating bridge, as well as from the production and transport of supplemental pontoons."

Haul routes are not a main project component, and are not part of the Executive Summary. For more information on haul routes, please see Exhibit 44 of the SDEIS Cultural Resources Discipline Report. Updated

C-008-113

of Harvard Avenue East and East Shelby Street, the contributing and individually eligible Dawson House (A and C, 1907) on the southeast corner of Harvard Avenue East and East Shelby Street, the contributing Barter-Devers House (C, 1908) at 2832 Harvard Avenue East, the contributing and individually eligible Stephens House (C, 1913) at the northeast corner of Harvard Avenue East and East Hamlin Street, the contributing and individually eligible Gleason House (C, 1909) on the southeast corner of Harvard Avenue East and East Hamlin Street, the contributing Stokes House (1906) at 2722 Harvard Avenue East, the individually listed William H. Parsons House (A and C, Edward J. Duhamel, 1903; the Harvard Mansion as a City Landmark) on the northeast corner of Harvard Avenue East and East Edgar Street, the accustomed parking (in its lot) and characteristic uses of the possibly eligible St. Patrick's Church (A and C, Krantz & Wrede, 1961), the contributing and individually eligible King-Friedman House (A and C, 1910), and the contributing and individually eligible Clemmer House (A and C, 1910). (8 contributing, 1 thrice listed, and 8 possibly individually eligible resources)

- o This haul route would also adversely affect in the Roanoke Park Historic District 2 contributing and individually eligible resources along East Roanoke Street, including its contributing and individually eligible Gates-Bass Mansion (A and C, Elmer E. Green, 1909), and its contributing and individually eligible Booth House (A, 1907). On 10th Avenue East, the contributing and individually eligible Dalley House (C. Huntington & Gould, 1910), and the contributing Gifford, Fish, Bogue, Bloxom, and Horner houses would be adversely affected by this haul route. On Broadway Avenue East, the contributing Betterton-Hillman House (Elmer E. Green, 1912), the contributing and individually eligible Mayor Ole Hanson House (A and C, Elmer E. Green, 1911), the contributing and individually eligible Storm House (A and C, McClelland & Pinneh, 1924), the possibly eligible Winter House (C, 1942), and the possibly eligible St. Patrick Church (A and C, Krantz & Wrede, 1961) would be adversely affected by the haul route. (9 contributing and 7 possibly individually eligible resources)

C-008-114

- Discuss effects of the **haul route** along Fuhrman-Boyer Avenue East on historic resources in the Portage Bay neighborhood, including the as yet unsurveyed historic resources on the north and south Delmar Drive East hillsides, historic resources in the houseboat community, and historic resources along both sides of Fuhrman-Boyer Avenue East: "This potential haul route would adversely affect the setting and feeling of residential historic resources with increased fugitive dust and diesel emissions, noise, vibration, traffic, congestion, dusty windows, and damage to buildings from erosion and soiling and to landscaping from pollution and vibration that would make individually eligible historic properties less desirable as single-family residences."
- 137, last para, 140 Says "with average construction activity, truck trips would range from one to two trips per hour." Add in their appropriate sections the information that there would be **one to two trips per hour under Option A and Option L, and 1-5 trips per hour under Option K. During peak construction periods truck trips would range from 2-8 trips per hour under Option A, 2-20 trips under Option K, and 2-12 trips per hour under Option L.** The omission of the rest of the information from Marsha Tolon's 7/17/2009 letter would deceive the reader into thinking that truck trips would be confined to one to two trips per hour. We object to this misrepresentation of information relevant to effects findings. Provide an indication of how many and how often historic resources along this haul route would experience peak construction periods, and provide a comparison of the peak period volume of truck trips with normal arterial truck trip volumes. Note that diesel emissions are more polluting than auto emissions and that construction trucks are much noisier than autos.

C-008-115

- These effects of temporary closures and haul routes and ways of avoiding, minimizing, or mitigating them should be discussed in a Memorandum of Agreement.

information regarding haul routes is included in the Final Cultural Resources Assessment and Discipline Report.

The EIS analysis considers local street routes as possible haul routes for the purposes of estimating and disclosing effects that could occur. Local jurisdictions can limit the use of non-arterial streets for truck traffic; therefore, efforts were made to identify designated arterial streets for potential use as haul routes. Local jurisdictions will determine final haul routes for those actions and activities that require a street use or other jurisdictional permit. The permit process typically takes place during the final design phase and prior to construction.

C-008-056

As discussed in comment C-008-055, haul routes are not a main project component and will not be added to the Executive Summary. The Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) focuses on historic properties. St. Patrick's Church is neither a historic property nor a contributing element to the Roanoke Park Historic District and, therefore, is not discussed in the discipline report. St. Patrick's Church is noted as not being a contributing element to the historic district on the NRHP nomination form completed by O'Connor et al. that was used to list the district on the National Register. The form noted that the Church did not satisfy the requirements for individual listing or listing as a contributing property. St. Patrick's church is discussed in Sections 4.3 and 6.3 of the SDEIS and Final EIS.

C-008-057

The requested revision was not made because the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) focuses its discussion on historic properties within the project APE. The Laurelhurst community is not located within the APE and, therefore, is not listed on page one of the discipline report or discussed elsewhere within the document. The bulleted items on page 1 refer to areas within

C-008-116

Construction—Demolition, and (Re)Construction of the three arterial bridges and construction of the two lid over I-5 at East Roanoke Street and over SR520 between 10th Avenue East and Delmar Drive East , Option A

- 140–141 Move the discussion of effects on the properties mentioned in these paragraphs to the appropriate Option A, Option K, and Option L sections of the chapter’s consideration of potential construction effects.

C-008-117

- 140 Say, “. . . the entire Roanoke Park Historic District **including its individually listed** William H. Parsons House (Edward J. Duhamel, 1903),” to prevent mistaken impression that the Parsons House is outside the Roanoke Park Historic District as the other individual houses mentioned in the rest of the list are.

- 142 The same. Say, “The Roanoke Park Historic District **including its individually listed** William H. Parsons House.”

C-008-118

- **East Roanoke Street, 10th Avenue East, and Delmar Drive East Bridges, Demolition and Construction, Option A** The demolition and reconstruction of the East Roanoke Street bridge over I-5, the 10th Avenue East Bridge over SR 520, and the Delmar Drive East bridge over SR 520—of all three bridges—is likely to adversely affect contributing and individually eligible houses and use of the contributing Roanoke Park (1910) in the Roanoke Park Historic District along the 2600 block of Broadway Avenue East including the contributing Betterton-Hillman House at 2601 Broadway Avenue East (Elmer E. Green, 1912), the contributing and individually eligible Mayor Ole Hanson House at 2609 Broadway Avenue East (A and C, Elmer E. Green, 1911), the contributing and individually eligible Storm House (A and C, McClelland & Pinneh, 1924). All of these historic resources and the possibly eligible Winter house at 2617 Broadway Avenue East (C, 1942) and the possibly eligible St. Patrick Church (A and C, Wrede & Krontz, 1961) will suffer extreme concrete dust and ensuing building exterior erosion and soiling, dusty windows, damage to landscaping from dust and vibration, noise, vibration, and nighttime construction glare from the demolition and reconstruction of the East Roanoke Street, 10th Avenue East, and Delmar Drive East bridges. (4 contributing and 5 possibly individually eligible resources would suffer adverse effects from all three bridge and lid projects.
 - o **East Roanoke Bridge** The demolition and reconstruction of the East Roanoke Street bridge alone are likely to produce extreme effects of concrete dust and ensuing building exterior erosion and soiling, dusty windows, damage to landscaping from dust and vibration, noise, vibration, and nighttime construction glare in the areas of the Roanoke Park Historic District adjacent to I-5 near East Roanoke Street and along Harvard Avenue East, including the contributing and individually eligible Clemmer House (Criteria A and C, 1910) at 2612 Harvard Avenue East, the contributing and individually eligible King-Friedman House (A and C, 1910) at 2616 Harvard Avenue East, and the individually listed William H. Parsons House (the Harvard Mansion as a city-designated landmark, A and C, Edward J. Duhamel, 1903) at 2706 Harvard Avenue East. In addition to the aforementioned 4 contributing and 5 possibly individually eligible historic resources in the 2600 block of Broadway Avenue East, 2 contributing and individually eligible and 1 thrice-listed historic resources would be adversely affected by demolition and construction of the lid over I-5 at East Roanoke Street construction.
 - o **10th Avenue East and Delmar Drive East Bridges** Demolition and reconstruction of the two bridges in the area of the Roanoke Park Historic District across from the 10th Avenue East and Delmar Drive East bridges are likely to cause adverse effects from demolition concrete dust and ensuing building exterior erosion and soiling, dusty windows, damage to landscaping from air pollution and vibration, noise, vibration, and nighttime construction glare on historic resources including buffering mature trees and other vegetation along the south border of the district, and to 8 contributing and possibly 3 individually eligible historic resources: the contributing and individually eligible Booth House (A, 1907) at 1004 East Roanoke Street, the contributing and individually eligible Gates-Bass Mansion (A and C, Elmer E. Green,

the three main geographic areas that comprise the general project area. The boating community is not a geographic area and will not be included in the list.

C-008-058

Since the SDEIS was published, WSDOT has developed a Preferred Alternative. The Preferred Alternative does not include a replacement of the street bridge over I-5, but instead includes an enhanced bicycle and pedestrian path to be built as part of the existing East Roanoke Street overcrossing. The enhanced crossing would improve bicycle and pedestrian movement over I-5, and would offer aesthetic improvements such as plantings or views.

C-008-059

The requested change was not made because this section, and its explanation of the 6-lane alternative options, remains similar throughout the entire SDEIS, which was refined to increase readability and remain concise. See comment response C-008-61 below for a description of the new Portage Bay Bridge design.

C-008-060

The requested change was not made. Please refer to Exhibit 2-6 from the SDEIS for a depiction of the different configurations of the Portage Bay Bridge, which displays Option A next to Options K and L.

C-008-061

The design of the new Portage Bay Bridge, under the Preferred Alternative, includes two general-purpose lanes and an HOV lane in each direction, plus a westbound managed shoulder. A separate auxiliary lane is not part of the design of the Preferred Alternative. The westbound managed shoulder would be 8 feet wide. When operating, this shoulder lane would help to accommodate the high volume of

1909) at 1018 East Roanoke Street, the contributing and individually eligible Dalley House (C. Huntington & Gould, 1910) at 2608 10th Avenue East, the contributing Gifford House at 2612 10th Avenue East (1924), the contributing Fish House at 2616 10th Avenue East (1922), the contributing Jenner-Bogue House at 2622 10th Avenue East (1923), the contributing Bloxom House (C, 1917) at 2632 10th Avenue East, and the contributing Horner House (C, 1925) at 2636 10th Avenue East, as well as the aforementioned 4 contributing and possibly 5 individually eligible historic resources in the 2600 block of Broadway Avenue East.

- **Delmar Drive East Bridge** Demolition concrete dust and vibration, ensuing building exterior erosion and soiling, dusty windows, damage to landscaping from dust and vibration, noise, and nighttime construction glare from the Delmar Drive East part of the project is highly likely to have an adverse effect on the individually eligible Gunby House at 1118 East Roanoke Street (C, John T. Jacobsen, 1940), the individually eligible Alden Mason House at 2545 Fuhrman-Boyer Avenue East (A and C, Victor Steinbrueck, 1949), and the individually eligible Kelley House at 2518 Fuhrman-Boyer Avenue East (C, 1909). Portage Bay itself along with its marinas and boats will be vulnerable to heavy concrete dust and to possible soil deposits if the demolition activity produces vibration sufficient to start landslides. All of the contributing and individually eligible houses along the 2600 and 2700 blocks of 10th Avenue East, including 11 contributing houses, 4 of which are possibly individually eligible as well, will be vulnerable to landslides produced by bridge demolition vibration. As recently as May 2005, the Seattle Department of Planning and Development identified the east side of 10th Avenue East as a “Landslide Prone Hazard Area.”
- Along the north side of Delmar Drive East, where houses sit on the edges of precipitous, landslide-prone hillsides that already experience periodic landslides, Arthur Loveless-, Paul Thiry-, and Roland Terry–designed houses as yet unsurveyed and outside the Area of Potential Effects¹ will be exposed to heavy demolition dust and vibration, ensuing building exterior erosion and soiling, dusty windows, damage to landscaping from air pollution and vibration, noise, and nighttime glare from the demolition and construction of the Delmar Drive East bridge. Access to these houses will be blocked by the closure of Delmar Drive East. Note that the properties on which these houses sit already suffer periodic landslides. These properties need to be included in the CRDR’s survey, and measures to prevent construction landslides need to be included in a Memorandum of Agreement with the Portage Bay/Roanoke Park Community Council.
- Architect-designed houses on the steep, landslide-prone hillside on the south side of Delmar Drive East have not been surveyed yet, either, and are likely to suffer the heavy demolition dust and vibration, building erosion and soiling, damage to landscaping from air pollution and vibration, dusty windows, noise, and nighttime glare from the Delmar Drive East Bridge demolition and construction activity, as well.
- Adverse effects to both historic buildings and vegetation from all three arterial bridge and lid projects should be anticipated, and ways of avoiding, minimizing, and/or mitigating the multiple effects of this extremely dusty, clogging, building eroding and soiling, noisy, and earth-shaking demolition and construction activity should be discussed in a Memorandum of Agreement.
- The reconstruction plan for the bridge over I-5 at East Roanoke Street and the 10th Avenue East bridge over SR 520 is to build half lids to serve traffic as temporary bridges north of the present East Roanoke Street Bridge and either east or west of the present 10th Avenue East Bridge over SR 520. The closure of Delmar Drive East, as we understand it, means that a temporary bridge (half lid) will not be constructed adjacent to the present Delmar Drive East bridge over SR 520 at

¹ It’s difficult to determine, looking at the maps, whether these properties on Delmar Drive East lie within the Area of Potential Effects. Please advise. If they are not, we suggest that both they and the historic resources on the south hillside of Delmar Drive East should be included in the Area of Potential Effects.

vehicles entering from the Montlake interchange as well as those vehicles exiting to I-5 and improve operations on both the SR 520 westbound mainline and on Montlake Boulevard.

C-008-062

The Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) discusses the potential effect of the Preferred Alternative on historic resources in the APE. Discussion and analysis of the options evaluated in the SDEIS were not revisited or revised.

C-008-063

Quieter concrete pavement is included as a design feature for Option A, Option K, and the Preferred Alternative; however, because it is not an FHWA-approved mitigation measure and because future pavement surface conditions cannot be determined with certainty, it is not included in the noise model for the project.

WSDOT proposes to manage noise using a number of noise reduction strategies that are included in the Preferred Alternative, such 4-foot concrete traffic barriers with noise absorptive coating, noise-absorptive materials around lid portals, and a reduced speed limit on the Portage Bay Bridge.

For more information on noise mitigation, please see the Noise Discipline Report Addendum (Attachment 7 to the Final EIS).

C-008-064

The requested edit has not been made. Since the SDEIS was published, WSDOT has identified a Preferred Alternative with a floating bridge height that addresses both community concerns and bridge maintenance needs. The height of the floating bridge would be

- C-008-119** | Delmar Drive East, although building one there to avoid the closure of Delmar Drive East could be considered.
- C-008-120** | • Finishing and landscaping the lids over I-5 and SR 520 immediately after the replacement bridges have been constructed and put into operation would spare historic resources from many of the further adverse effects of the project's total seven-and-a-half-year to eight-year construction phase and provide an opportunity for monitoring and fine-tuning to perfect measures to avoid, minimize, and mitigate operation effects on historic resources. Here it is relevant to mention that the features in this area are the same for all three options and that building the lids could therefore take place early and even before the rest of the project is undertaken.
- C-008-121** | • Note that in the Phased Implementation scenario, said in the SDEIS to be the most likely scenario, lid construction would be deferred indefinitely. We request discussion of the adverse effects of this damaging prospect and treatment of the lid timing issue and construction mitigation in a Memorandum of Agreement.
- C-008-122** | • The effects of demolition and (re)construction of the three arterial bridges and two lids and ways of avoiding, minimizing, or mitigating the multiple effects should be discussed in the Memorandum of Agreement.
- C-008-123** | *Construction—Demolition and (Re)construction of the Seven-Lane Portage Bay Bridge, Option A*
- 140 third para, third sentence Saying “The temporary work bridges, barges, and heavy equipment used for demolition and construction of the Portage Bay Bridge **might** also introduce visual effects to the area” is unduly tentative. They will introduce adverse **visual effects** to the area.
- C-008-124** | • 141 The discussion treats the effects of the 6 years of demolition and construction of the Portage Bay Bridge without mentioning the adverse effects of this six-year period, with **views** of temporary work structures and barges, demolition noise and vibration, concrete dust and ensuing building erosion and soiling, dusty windows, damage to landscaping from dust and vibration, construction noise, and nighttime construction glare to historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood. Adverse effects of the construction of the Portage Bay Bridge, which in addition to being more than twice as wide or wider, depending on the option chosen, and higher, will be moved to the north in front of more homes in the Roanoke Park Historic District and in the Portage Bay neighborhood, are not discussed. These adverse construction effect on the Roanoke Park Historic District and the Portage Bay neighborhood should be discussed and avoidance, minimization and mitigation taken up in a Memorandum of Agreement.
- C-008-125** | • Again, we request that identification of the contributing and individually eligible historic resources in the Roanoke Park Historic District be brought to bear on effects findings as the contributing and individually eligible status of historic resources in the Montlake Historic District is routinely brought to bear on effects findings for that historic district.
- C-008-126** | • 141 Moving from west to east, discuss the effects of Option A construction on the area between I-5 and Portage Bay, presently omitted. Discuss historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood including historic resources on the north and south hillsides of Delmar Drive East that would be adversely affected by demolition and the construction of Option A's seven-lane Portage Bay Bridge, which include **visual blight**, noise, vibration, air pollution and consequent building exterior erosion and soiling, dusty windows, nighttime glare, and vegetation removal and damage.
- C-008-127** | • Historic properties on East Roanoke Street that would experience adverse effects from the demolition and construction of the seven-lane Portage Bay Bridge of Option A include the contributing and individually eligible Gates-Bass Mansion (A and C, Elmer E. Green, 1909) at 1018 East Roanoke Street, the contributing and individually eligible

approximately 20 feet above the water, and approximately 5 to 10 feet lower than the SDEIS design options. Noise walls are not recommended for the Evergreen Point Floating Bridge because there are no permanent noise-sensitive land uses in Lake Washington.

C-008-065

The descriptions on page 8 of the Cultural Resources Discipline Report refer to all options, as noted in Exhibit 5 on the next page, entitled, “6-Lane Alternative at the Evergreen Point Bridge (Common to All Options).”

C-008-066

As discussed in the response to Comment C-008-003 and Section 2.8 of this Final EIS, this final EIS discusses the potential for construction of the floating bridge and landings to be built as the first phase and other areas to be constructed concurrently at a later time.

With revised potential phasing, the construction of the Portage Bay Bridge and the West Approach would largely overlap and would be constructed concurrently.

WSDOT will employ a number of best management practices and mitigation measures from the construction management plan to reduce construction effects.

C-008-067

The requested change was not made because the Phased Implementation scenario that was considered in the SDEIS is not discussed in the Final Cultural Resources Discipline Report (Attachment 7 to the Final EIS). However, the Final EIS evaluates revised phasing as described in the response to Comment C-008-003.

C-008-127

Booth House (A, 1907) at 1004 East Roanoke Street, and the contributing Roanoke Park (1910). Along the 2600 block of the district's 10th Avenue East, the contributing and individually eligible Dalley House (C, Huntington & Gould, 1910) at 2608 10th Avenue East, the contributing Gifford House at 2612 (1924), the contributing Fish House at 2616 (1922), the contributing Jenner-Bogue House at 2622 (1923) the contributing Bloxom House (1917) at 2632, and the contributing Horner House (1925) at 2636 10th Avenue East would experience these adverse effects. (9 contributing, 3 of which are also individually eligible)

- In the 2700 block of the Roanoke Park Historic District's 10th Avenue East, historic properties adversely affected by the demolition and construction of the seven-lane Portage Bay Bridge of Option A would include the contributing and individually eligible Beckwith-Thompson House (A, 1910) at 2700, the contributing and individually eligible Saunders House (A and C, Frederick A. Sexton, 1908) at 2701, the contributing and individually eligible Parshall House (C, Thomas L. West, 1911) at 2706, the contributing and individually eligible Siegley House (C, E. H. Sanders, 1909) at 2712, the contributing and individually eligible Cavanaugh House (C, 1909) at 2722, the contributing and individually eligible Conly House (A, 1916) at 2726, and the contributing and individually eligible Finley House (A and C, 1909) at 2731 10th Avenue East. (7 contributing, of which all 7 are also individually eligible)
- Historic resources in the Portage Bay neighborhood that would be adversely affected by the demolition and construction of the seven-lane Portage Bay Bridge of Option A include the individually eligible Gunby House (C, John T. Jacobsen, 1940), the individually eligible Alden Mason House (A and C, Victor Steinbrueck, 1949), and the individually eligible Kelley House (C, 1909), which will be adjacent to the wider, higher bridge moved farther north of Option A.
- Other potentially eligible resources in the Portage Bay neighborhood have not been surveyed, including the Arthur Loveless, Paul Thiry, and Roland Terry houses on the north side of Delmar Drive East and the architect-designed houses at the top of the Delmar Drive East south hillside, which might or might not lie within the APE, and the houseboat community in the west end of Portage Bay, the potential historic bungalow district along East Gwinn Street between Harvard Avenue East and Fuhrman-Boyer Avenue East, and historic resources along many of the other streets that make up the point, and many of the other historic resources along both sides of Fuhrman-Boyer Avenue East, which have been left out of the APE. Most of these properties would be affected by hauling and construction, and some of them would be affected by demolition as well.

C-008-128

- Without the lids that have been designed into the project, that are an integral part of the project, and because the "temporary" construction effects would go on for seven-and-a-half to eight years, these construction effects on historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood would be tantamount to permanent effects and ultimately lead to "demolition by neglect" as property values plummeted, and even then **visual blight**, noise, dust, vibration, and diesel emissions would mean that people would not be able to sell their homes for amounts approaching their present worth. Many of the houses would be rented out to lower income renters, those not in a position to avoid living so close to a mammoth, many-years-long freeway construction project. Many of the houses would become rooming houses. A general deterioration would ensue in the absence of owner-residents who work steadily to improve their historic houses and their communities. Repairs would tend to be done on the cheap, with little regard for the historic integrity that owner-residents have prized and maintained over 100 years. With the deterioration of the social fabric of the communities would come a deterioration of the setting and feeling and characteristic single-family use of the Roanoke Park Historic District and of the historic resources in the Portage Bay neighborhood.

C-008-068

The requested change was not made because the first paragraph on this page is foundational and discusses the regulatory context behind the effort to safeguard cultural resources in the project area. It is noted, at the end of the page, that one of the governing regulations, Section 106, will, "...seek ways to avoid, minimize, or mitigate any adverse effects."

Avoid, minimize, and mitigate are not explicitly defined in Section 106 of the National Historic Preservation Act, but they are understood contextually. Avoid, minimize, and mitigate can be understood in the same way when reading the Cultural Resources Discipline Report.

C-008-069

The requested revision was not made because from a Section 106 standpoint, the viewsheds adjacent to the Roanoke Park Historic District are not historic or identified as character defining feature or contributing element that makes the district eligible for listing on the NRHP. The viewsheds are not considered a protected historic property because they are not listed or eligible for listing in the NRHP, and they were not listed as a character-defining feature or element of integrity of the Roanoke Park Historic District when it was determined eligible for the NRHP.

C-008-070

Although the Evergreen Point Floating Bridge is a historic property, its vulnerability to catastrophic failure and the need to maintain the traffic movement function across the lake in that location compels replacement of the structure and supersedes the preservation purpose of Section 106. Its demolition will be mitigated in a number of ways, including extensive documentation of it as a historic property.

The views from the Evergreen Point Floating Bridge are not a protected historic property. The views are not listed, or eligible for inclusion, in the National Register of Historic Places. However, the views will be

C-008-128

- An accurate **perception that the neighborhoods had become unhealthy** would mean that many families with young children would move away. A recent snapshot, block-to-block survey of the number of children under the age of 20 conducted by the Portage Bay/Roanoke Park Community Council revealed that the predominantly single-family homes in the Roanoke Park Historic District and the Portage Bay neighborhood shelter 126 young children under the age of 20, of which 79 are under the age of 14. Note that the reluctance of many parents in this day and age to release such information means that these numbers of children are probably higher.

C-008-129

- Finishing and landscaping the lids over I-5 and SR 520 immediately after the replacement bridges have been constructed and put into operation would spare historic resources from many of the further adverse effects of Option A's seven-lane Portage Bay Bridge project's six-year construction phase and provide an opportunity for monitoring and fine-tuning to perfect measures to avoid, minimize, and mitigate subsequent permanent operation effects on historic resources.
- Scheduling lid construction for an early part of the Phased Implementation scenario rather than deferring lid construction indefinitely would address some of these adverse construction effects. This question and other means of avoiding, minimizing, and mitigating effects of the construction of the Portage Bay Bridge need to be addressed in a Memorandum of Agreement.

C-008-130

Construction—Portage Bay Bridge and Second Bascule Bridge, Option A, Views

- **Views** to the east, of Portage Bay, the historic NOAA Fisheries Building, the historic Seattle Yacht Club and marinas, the historic Montlake Cut, the historic Montlake Bridge, Lake Washington, the lights of Bellevue and Kirkland, trees in the foothills, and the Cascade Mountains from many of the contributing and individually eligible houses in the Roanoke Park Historic District and historic resources in the Portage Bay neighborhood both surveyed and unsurveyed would be adversely affected by the construction of Option A's seven-lane Portage Bay Bridge and second bascule bridge. Construction of the Portage Bay Bridge expected to last 6 years and of the second bascule bridge expected to last 27 months would be **both visible and audible**. These construction effects would be compounded by Sound Transit's deep-bore 300-foot-deep twin tunnel project, which is not even mentioned in the *Cultural Resources Discipline Report*. That project is underway now and is expected to go on until some time in 2016.

C-008-131

- Note that the statement that "only a few" historic resources in the Roanoke Park Historic District enjoy this panoramic **view shed** of high vividness is a diminution of the number of houses that enjoy this viewshed and of the extent and the quality of the views enjoyed by these historic resources. This misinformation, repeated in the December 2009 *Visual Quality and Aesthetics Discipline Report*, a reversal of the description in the 2005 *VQADR*, has contributed to a finding of "no adverse effect" and a consequent refusal to engage in a Memorandum of Agreement. The diminishing language needs to be corrected, the adverse effects need to be acknowledged, and the adverse effects should be taken up in a Memorandum of Agreement.
- The East Edgar Street, East Hamlin Street, and East Shelby Street hills continue to slope at the top of the Roanoke Park Historic District plateau from the east side of 10th Avenue East to the plateau's high point along Broadway Avenue East. Residents in the large houses at the intersections of the Roanoke Park Historic District as far west as the west side of Broadway Avenue East at some intersections enjoy views east variously including Portage Bay, the historic Fisheries Building, the historic Seattle Yacht Club and marinas, the historic Montlake Cut, the historic Montlake Bridge, Lake Washington, the lights of Bellevue and Kirkland, trees in the foothills, and the Cascade Mountains. Many more historic resources in the Roanoke Park Historic District than "a few" enjoy these memorable "expansive" views of "high vividness."
 - Houses from which these expansive views of high vividness may be enjoyed include most obviously the contributing and individually eligible Gates-Bass Mansion at 1018 East Roanoke Street (A and C, Elmer E. Green, 1909) and most of the houses along the east side of 10th Avenue East: the contributing Gifford House (1924) at 2612, the

maintained and will be available to all motorists, bicyclists, and pedestrians alike. Noise walls are not recommended for the floating span of the new bridge, and travelers will be able to see the same views that they currently enjoy.

C-008-071

The number of historic properties in the Roanoke Park Historic District that enjoy views of the Portage Bay area has been revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-072

Indirect effects on the Roanoke Park Historic District from project construction would alter the integrity of setting and feeling of the district, but would not diminish the integrity of the characteristics that convey its significance, including materials, design, workmanship, association and location. Additionally, the stipulations provided in the Section 106 Programmatic Agreement (Attachment 9 of the Final EIS) would resolve the adverse effect from the project.

As previously mentioned, no landslides in the historic district are expected from project construction.

C-008-073

Visual effects of the new Portage Bay bridge will be minimized through a context-sensitive design process for the new bridge, which will include the Section 106 consulting parties.

Once completed, the SR 520, I-5 to Medina project is expected to improve air quality and water quality and reduce noise levels. Because of these projected improvements, the Roanoke Park Historic District would not be affected by increased traffic or traffic noise or effects from emissions or fugitive dust.

C-008-131

contributing Fish House (1922) at 2616, the contributing and individually eligible Bogue House (A, 1923) at 2622, the contributing Bloxom House (1917) at 2632, the contributing Horner House (1925) at 2636, the contributing and individually eligible Beckwick-Thompson House (A, 1910) at 2700, the contributing and individually eligible Parshall House (C, Thomas L. West, 1911) at 2706, the contributing and individually eligible Siegley House (C, 1909) at 2712, the contributing and individually eligible Cavanaugh House (C, E. H. Sanders, 1909) at 2722, the contributing and individually eligible Conly House (A, 1916) at 2726, the contributing and individually eligible Mayer House (C, Hunt & Wheatley, 1924) at 2802, the contributing and individually eligible Spencer House (C, Ed Merritt, 1909) at 2808, the contributing Turner House (1903) at 2812, the contributing and individually eligible Richardson House (C, Julian G. Everett, 1912) at 2816, the contributing and individually eligible Phillips-Hyde House (C, Huntington & Gould, 1909) at 2822, the contributing and individually eligible Higgins House (A, 1909) at 2832, and the contributing and individually eligible Patten House (A and C, 1909) at 2836. (The contributing and individually eligible Booth House at 1004 East Roanoke Street [A, 1907] and the contributing and individually eligible Dalley House at 2608 10th Avenue East [C, Huntington & Gould, 1909] have their views impeded by trees and other houses.) (20 contributing, 13 of which are also individually eligible)

- The four houses on the north side of East Shelby Street at its east end that enjoy these views are the contributing and individually eligible Prosser-Dowling House (A and C, Hunt & Jones, 1909) at 912, the contributing and individually eligible Slater House (C, 1910) at 920, the contributing and individually eligible Ross House (A, 1912) at 926, and the contributing Dart House (C, 1909) at 1000. On the south side of East Shelby Street, the contributing and individually eligible Twelves House (A and C, Edwin J. Ivey, 1923) at 817, the contributing and individually eligible Denny House (A and C, 1910) at 2838 Broadway Avenue East, and the contributing Sutherland House (1908) at 2837 10th Avenue East also enjoy these views. (7 contributing, of which 5 are also individually eligible)
- On the north and south sides of East Hamlin Street, the contributing and individually eligible Sullivan-Walker House (A and C, 1899—the oldest house in the district) at 2736 Broadway Avenue East, the contributing and individually eligible Finley House (A and C, 1909) at 2731 10th Avenue East, the contributing and individually eligible Hunter House (A and C, Frederick A. Sexton, 1909) at 2801 Broadway Avenue East, the contributing and individually eligible Johanson House (A, and C, attributed to Cutter & Malmgren, 1909) at 2800 Broadway Avenue East, and the contributing and individually eligible Wentworth-Elliott House (A and C, Merritt, Hall & Merritt, 1910) at 918 East Hamlin Street enjoy these views east as well. (5 contributing, all 5 of which are individually eligible)
- As do, before leafing out, the contributing and individually eligible Neterer House (A and C, Andrew Willatsen, 1915) at 2702 Broadway Avenue East and the contributing and individually eligible Saunders House (A and C, Frederick A. Sexton, 1908) at 2701 10th Avenue East. (Other houses along the west side of 10th Avenue East have partial views of Lake Washington and the Cascades from their high vantage points.) (2 contributing, both of which are individually eligible)

C-008-132

- All of these 34 contributing resources—more than a third of the Roanoke Park Historic District's 80 contributing resources and almost half of the district's 57 individually eligible historic resources—would suffer damage from the adverse effects to the setting and feeling of the Roanoke Park Historic District from the visual blight alone, and from pollution, noise, and nighttime glare at the various sites during the seven-and-a-half-year to eight-year construction project. (The State Historic Preservation Officer will decide finally whether the adversely affected contributing

The Area of Potential Effects (APE) was established in consultation with the Washington State Department of Archaeology and Historic Preservation (DAHP) and with the Section 106 consulting parties and revised according to comments throughout the project's environmental review and Section 106 consultation processes. DAHP has concurred with the determinations of eligibility for the historic properties identified within the original and revised boundaries of the APE.

C-008-074

Please see the responses to comments C-008-022 and C-008-028, which states that no landslides are expected from this project.

C-008-075

Please see the responses to comments C-008-025 and C-008-069, which states that the viewsheds are not a protected historic property and the visual effect to the Roanoke Park Historic District would not diminish the integrity of the historic district.

C-008-076

Upon review of the Sherwood Report, this paragraph has been revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS). The City of Seattle acquired the land in 1905 and developed it as a park in 1910. Interlaken Park was established in 1905.

C-008-077

Although WSDOT did not contact all of the owners of the more than 350 historic buildings identified in the APE, WSDOT did contact a number of entities with demonstrated interest in the identified historic resources within the APE and invited them to be part of the Section 106 process. In spring 2009, WSDOT initiated contact with the City of Seattle

C-008-132

resources identified here include properties also individually eligible for National Register and Washington Heritage Register listing.)

In addition, as has been noted, some of these 34 resources both contributing and contributing and individually eligible—and one listed resource along Harvard Avenue East, more contributing and individually eligible resources along the west side of 10th Avenue East, the as yet unmentioned contributing and individually eligible resources along the east and west sides of Broadway Avenue East, and the four historic contributing and individually eligible resources along East Roanoke Street including the contributing Roanoke Park itself—would experience adverse effects from staging, vegetation removal, detours, temporary closures and haul routes, demolition and (re)construction of the three arterial bridges and two lids, demolition and (re)construction of the seven-lane Portage Bay Bridge, and construction of the second bascule bridge of Option A.

- These multiple adverse effects of demolition and (re)construction to so many contributing and individually eligible resources and ways of avoiding, minimizing, or mitigating them should be discussed in a Memorandum of Agreement.

C-008-133

Construction— Demolition and Construction, Option K

- 149, Discuss the construction effects of the six-lane Option K on the historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood.
 - The construction effects on historic resources would come from staging, vegetation removal, detours, temporary closures and haul routes, demolition and construction of three bridges and two lids, and demolition and construction of the six-lane Portage Bay Bridge.
 - Construction effects of the six-lane Portage Bay Bridge would be almost as damaging in its effects as construction of Option A’s seven-lane Portage Bay Bridge. See the earlier discussion of these effects with respect to Option A, and include them here.
 - Construction of Option K’s tunnels under the Montlake Cut, with freezing, boring, and excavation, would be visible and audible for almost four years. Coincident with this part of the SR 520 project in Option K would be Sound Transit’s project to excavate, haul, and construct a 300-foot-deep twin tunnel across the Montlake Cut. This project is underway and is expected to go on until 2016.
 - Option K’s lower profile at various sites in the project as a whole might mean that visual blight from construction might be a less adverse effect over the seven-and-a-half-year construction phase.

C-008-134

- Without the lids that have been designed into the project, that are an integral part of the project, and because the “temporary” construction effects would go on for seven-and-a-half to eight years, these effects on historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood would be tantamount to permanent effects and lead to ultimate “demolition by neglect” as property values plummeted, and even then visual blight, noise, dust, vibration, and diesel emissions would mean that people would not be able to sell their homes for any amount approaching their present worth. Many of the houses would be rented out to lower income renters, those not in a position to avoid living so close to a mammoth, many-years-long freeway construction project. Many of the houses would become rentals and rooming houses. A general deterioration would ensue in the absence of owner-residents who work steadily to improve their historic houses and their communities. Repairs would tend to be done on the cheap, with little regard for the historic integrity that owner-residents have prized and maintained over 100 years. With the deterioration of the social fabric of the neighborhoods, would come a deterioration of the setting and feeling and characteristic single-family use of the Roanoke Park Historic District and of the historic resources in the Portage Bay neighborhood.

Historic Preservation Program, the Documentation and Conservation of Buildings, Sites and Neighborhoods of the Modern Movement Western Washington Chapter, the Eastlake Community Council, the Historic Bridge Foundation, Historic Seattle Preservation Foundation, Museum of History and Industry, the Montlake Community Club, National Oceanic and Atmospheric Administration Northwest Fisheries Science Center, Friends of Seattle’s Olmsted Parks, the Portage Bay/Roanoke Park Community Council, the Seattle Yacht Club, the University of Washington, the Washington Park Arboretum Foundation, and the Washington Trust for Historic Preservation.

The North Capitol Hill Neighborhood Association was invited to be part of the Section 106 consulting process in the summer of 2010 after a suggestion by the Portage Bay/Roanoke Park Community Council.

The Port of Olympia accepted the offer to engage in the Section 106 consulting process in the summer of 2010.

Following guidelines in 36 CFR 800, WSDOT and FHWA have provided the public with information about the project and its effects on historic properties and have sought public comment and input. WSDOT would be open to including additional consulting parties into the Section 106 process if interested groups came forward or were recommended.

C-008-078

Please see the response to Comment C-008-012, which discusses the additional survey of historic properties within the APE performed by WSDOT.

C-008-079

This was revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-135

- An accurate perception that the neighborhoods had become unhealthy would mean that many families with young children would move away. A recent snapshot, block-to-block survey of the number of young children under the age of 20 conducted by the Portage Bay/Roanoke Park Community Council revealed that the predominantly single-family homes in the Roanoke Park Historic District and the Portage Bay neighborhood shelter 126 children, 79 of which are under 14. Note that the reluctance of many parents in this day and age to release such information means that these numbers of children are probably higher. A Memorandum of Agreement should treat avoiding, minimizing, and mitigating these adverse secondary, or indirect, effects.

C-008-136

- Finishing and landscaping the lids over I-5 and SR 520 immediately after the replacement bridges have been constructed and put into operation would spare historic resources from many of the further adverse effects of Option K's six-lane Portage Bay Bridge project's six-year construction phase and provide an opportunity for monitoring and fine-tuning to perfect measures to avoid, minimize, and mitigate subsequent permanent operation effects on historic resources.
- The multiple effects of demolition and (re)construction in Option K and ways of avoiding, minimizing, or mitigating them should be discussed in a Memorandum of Agreement.

Construction—Demolition and Construction, Option L

C-008-137

- 160, Discuss the construction effects of the six-lane Option L on the historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood.
 - The construction effects on historic resources would come from staging, vegetation removal, detours, temporary closures and haul routes, demolition and construction of bridges and lids, and construction of the six-lane Portage Bay Bridge.
 - Construction of Option L's six-lane Portage Bay Bridge over a six-year period would be almost as damaging in its effects as construction of Option A's seven-lane Portage Bay Bridge. See the earlier discussion of these effects with respect to Option A, and include them here.
 - Construction of Option L's second bascule bridge farther to the east and out of sight of these neighborhoods might have little effect on the neighborhoods that surround the Portage Bay basin. Note that any noise from the second bascule bridge construction project that reached the Roanoke Park Historic District or historic resources in the Portage Bay neighborhood would be compounded by noise from Sound Transit's project to construct a 300-foot-deep twin tunnel across the Montlake Cut. This project is underway and is expected to last until some time in 2016.
 - Option L's elevated profile at various sites in the project as a whole would mean that visual blight from construction might be a more adverse effect over the seven-and-a-half-year construction phase.

C-008-138

- Without the lids that have been designed into the project, that are an integral part of the project, and because the "temporary" construction effects would go on for seven-and-a-half years, these effects on historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood would be tantamount to permanent and lead to ultimate "demolition by neglect" as property values plummeted, and even then visual blight, noise, dust, vibration, and diesel emissions would mean that people would not be able to sell their homes for any amount approaching their present worth. Many of the houses would be rented out to lower income renters, those not in a position to avoid living so close to a mammoth, many-years-long freeway construction project. Many of the houses would become rooming houses. A general deterioration would ensue in the absence of owner-residents who work steadily to improve their historic houses and their communities. Repairs would tend to be done on the cheap, with little regard for the historic integrity that owner-residents have prized and maintained over 100 years. With the deterioration of the social fabric of the neighborhoods would come a deterioration of the setting

C-008-080

Please see the response to Comment C-008-046, which states that the number of contributing resources in the Roanoke Park Historic District is clarified throughout the Cultural Resources Assessment and Discipline Report.

C-008-081

This was revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS). The William Parsons House will now be referred to as William H. Parsons House (Harvard Mansion).

C-008-082

The examples of adverse effects provided on this page were taken directly from 36 CFR 800.5. Because Section 106 is the regulation that guides the project's cultural resource effects determinations, the examples of adverse effects and the contextual definitions of direct, indirect, and cumulative effects were taken from this regulation as well. The regulation does not provide explicit definitions for direct, indirect, and cumulative effects, but they are implied contextually. For additional examples of adverse effects see 36 CFR 800, Protection of Historic Properties, Section 800.5: Assessment of adverse effects.

C-008-083

The requested change was not made because Option A was one of the 6-lane design options presented and evaluated in the SDEIS.

C-008-084

For Options A, K and L, the areas near the I-5 and SR 520 interchange and between I-5 and the Portage Bay Bridge were the same and would have had similar effects on historic properties. The requested change was not made because the Final Cultural Resources Assessment and

- C-008-138** | and feeling and the characteristic single-family use of the historic district and of the historic resources in the Portage Bay neighborhood.
- C-008-139** | • An accurate **perception that the neighborhoods had become unhealthy** would mean that many families with young children would move away. A recent snapshot, block-to-block survey of the number of young children under the age of 20 conducted by the Portage Bay/Roanoke Park Community Council revealed that the predominantly single-family homes in the Roanoke Park Historic District and the Portage Bay neighborhood shelter 126 young children including 79 under the age of 14. Note that the reluctance of many parents in this day and age to release such information means that these numbers of children are probably higher.
- C-008-140** | • Finishing and landscaping the lids over I-5 and SR 520 immediately after the replacement bridges have been constructed and put into operation would spare contributing and potentially individually eligible historic resources from many of the further adverse effects of Option L's six-lane Portage Bay Bridge project's six-year construction phase and provide an opportunity for monitoring and fine-tuning to perfect measures to avoid, minimize, and mitigate subsequent permanent operation effects on historic resources.
- The effects of demolition and (re)construction in Option L and ways of avoiding, minimizing, or mitigating them should be discussed in a Memorandum of Agreement.
- C-008-141** | • Note that the decline in livability described in many of the *SDEIS* discipline reports and in the *Health Impact Assessment* (regrettably, not included in the *SDEIS*) would lead to "demolition by neglect" of historic resources in these areas adjacent to the SR-520 Bridge Replacement and HOV Project. The lids designed into the project are integral, not mitigation, but early **timing** of their completion could be regarded as a construction mitigation of this secondary, indirect, adverse effect in a Memorandum of Agreement.
- C-008-142** | **Potential Effects of the Project, Operation section p 170**
- Because the report says that less is known of details in the area near the I-5 and SR 520 interchange, treat the two areas, the area near the I-5 and SR 520 interchange and the area between I-5 and Portage Bay, separately.
- C-008-143** | **I-5 and SR 520 Interchange, Operation, Options A, K, and L**
- Of the I-5 and SR 520 interchange, say something to the effect of "The operation of the SR 520 and I-5 interchange is likely to have an adverse effect on the eligible Chung House at 1980 Harvard Avenue East (1932) and possibly on the eligible Talder House (1909) at 2352 Broadway Avenue East. When design and operation details are known, possible effects of operation of this part of the project on historic resources will be more fully evaluated."
- C-008-144** | **Area Between I-5 and Portage Bay, Operation, Options A, K, and L**
Operation—I-5 and 10th & Delmar Lids, Options A, K, and L
- Without the lids that have been designed into the project, that are an integral part of the project, the operation effects on historic resources in the Roanoke Park Historic District and Portage Bay neighborhood would lead to ultimate "demolition by neglect" as property values plummeted, and even then noise, air pollution, and visual blight would mean that people would not be able to sell their homes for any amount approaching their present worth. Many of the houses would be rented out to lower income renters, those not in a position to avoid living so close to a mammoth freeway. Many of the houses would become rooming houses. A general deterioration would ensue in the absence of owner-residents who work steadily to improve their historic houses and their communities. Repairs would tend to be done on the cheap, with little regard for the historic integrity that owner-residents have prized and maintained over 100 years. With the deterioration of the social fabric of the neighborhoods, would come a **deterioration of the setting and feeling and characteristic single-family use** of the historic district and the historic resources in the Portage Bay neighborhood.

Discipline Report (Attachment 7 to the Final EIS) focuses its assessment on the potential effect from the Preferred Alternative and does not revisit a discussion of Options A, K and L.

C-008-085

The examples of potential mitigation listed on this page, in the last paragraph, are not the only ways to mitigate an adverse effect on historic properties. As stated in the text, they were examples and suggestions only and were not meant to be an exhaustive list of potential mitigation measures. Mitigation agreed upon to resolve the project's adverse effect can be found in the Programmatic Agreement (Attachment 9 to the Final EIS).

Compensatory mitigation is discussed, in greater detail, in the Mitigation for Unavoidable Adverse Effects to Archaeological Resources section on pages 192 and 193 in the Cultural Resources Discipline Report.

C-008-086

Please see the response to Comment C-008-046, which states that the number of contributing resources in the Roanoke Park Historic District is clarified throughout the Final Cultural Resources Assessment and Discipline Report (Attachment 7 of the Final EIS).

C-008-087

These exhibits have been revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) as follows:

- A description of the Roanoke Park Historic District has been added
- Exhibit 13 and Exhibit 15 are now merged into one exhibit
- A period of significance has been added for the Roanoke Park Historic District

C-008-145

- An accurate perception that the neighborhoods had become unhealthy would mean that many families with young children would move away. A recent block-to-block, snapshot survey of the number of young children under the age of 20 conducted by the Portage Bay/Roanoke Park Community Council revealed that the predominantly single-family homes in the Roanoke Park Historic District and the Portage Bay neighborhood shelter 126 children including 79 under the age of 14. Note that the reluctance of many parents in this day and age to release such information means that these numbers of children are probably higher. This demographic would undergo a drastic alteration. A Memorandum of Agreement should treat these adverse secondary, or indirect, effects and ways of avoiding, minimizing, and mitigating them.

C-008-146

Operation, Portage Bay Bridge, Options A, K, and L

- Because the view shed is so important to the setting and feeling of the neighborhoods on the steep western and southern hillsides of the Portage Bay basin, we urge the writer to make use of the comments that follow here in discussions of the operation effects of Options A, K, and L on historic residences in the Roanoke Park Historic District and the Portage Bay neighborhood including historic residences that should be in the APE along both sides of Fuhrman-Boyer Avenue East, many as yet unsurveyed, an unsurveyed historic bungalow district along East Gwinn Street between Harvard Avenue East and Fuhrman-Boyer Avenue East, and unsurveyed historic resources along the other streets that make up the point, the unsurveyed houseboat community in west Portage Bay, and the as yet unsurveyed historic resources on the north and south hillsides of Delmar Drive East that might or might not be and should be included in the APE.

C-008-147

- We urge consideration of the 2005 VQADR because it is more candid with respect to adverse effects findings than the December 2009 SDEIS version of the VQADR, because the aesthetic principles the earlier report employed in its effects findings have not gone out of date, and because the earlier report's representations of these neighborhoods and its effects findings have not been tainted by the numerous misrepresentations and omissions in the 2009 CRDR, which obviously informed both the later VQADR's account of historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood and the later VQADR's much more sanguine effects findings.

C-008-148

- The *Visual Quality and Aesthetics Discipline Report* of 2005 for the SR 520 Bridge Replacement and HOV project observes of the present Portage Bay Bridge that **"the Portage Bay Bridge is a dominant part of many views from the hills around the bay and from the bay itself"** (p 19). The report also notes that **the present SR 520 structures "are not visually compatible with the natural-appearing landscapes or the smaller scale of the neighborhoods"** (p 24) and that **"the columns and highway break up the visual composition of natural-appearing areas and neighborhoods"** (p 24). The wider, higher prospective bridge, shifted north, and with massive concrete noise walls will be even less compatible with the natural-appearing landscapes and the smaller scale of the neighborhoods. And the higher, wider prospective six- or seven-lane bridge with massive noise walls in Options A and L, moved north in front of these historic resources, will break up the visual composition of natural-appearing areas and small-scale neighborhoods and bays to an extremely damaging degree. This is a cumulative adverse effect.

C-008-149

- A section of the 2005 *Visual Quality and Aesthetics Discipline Report* on viewer sensitivity to prospective changes to these views says, **"residents around Portage Bay and along the western shore of Lake Washington form the largest viewer group, with views of the roadway in Seattle. This includes East Roanoke Park . . ."** The report goes on, **"Residents and park and trail users in this [Seattle] area have high sensitivity to landscape aesthetics because they either are in their home community or expect a pleasant, natural-appearing landscape for recreation."** The Portage Bay Bridge demolition and construction over six years and the permanent operation of the higher, wider bridge, shifted north and with noise walls, will degrade views to an extreme extent.

- The total number of historic properties within the Roanoke Park Historic District has been added, as listed in the 2009 nomination form. (For reasons discussed in comment C-008-046, the 57 properties that were suggested by the Portage Bay/Roanoke Park Community Council to be individually eligible were not listed.)
- The William H. Parsons House (Harvard Mansion) is identified as part of the Roanoke Park Historic District.

C-008-088

Exhibit 13 and Exhibit 15 of the Cultural Resources Discipline Report were merged into one Exhibit for the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) and include the suggested changes.

WSDOT has determined that while there would be temporary effects that would slightly alter the setting and feeling of the Roanoke Park Historic District, the project effect would not diminish the integrity of the district because the characteristics that qualify the district for inclusion in the NRHP would not be affected. Furthermore, the Section 106 consultation process resulted in a Programmatic Agreement (Attachment 9 to the Final EIS) that records the stipulations agreed upon to resolve the adverse effect from the project. Please see the Final Cultural Resources Assessment and Discipline Report for further discussion.

C-008-089

These suggestions have been included as part of the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-090

The Final EIS contains the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS), which incorporates

C-008-150

- Under "Potential Effects of the Project," the 2005 *Visual Quality and Aesthetics Discipline Report* says that effects of the proposed alternatives on the visual quality and aesthetics of a landscape would differ according to changes in width, elevation, addition or removal of structures and vegetation, and the degree to which new structures would contrast or blend with the existing landscape. It rates visual quality changes on the basis of low, moderate, or high contrast. **High contrast is described as "easily noticeable contrast between scale or character of proposed facilities and existing environment in which viewers are sensitive to visual change and expect attractive views or surroundings and substantial changes in shadow levels of light and glare that would be easily noticeable."**

C-008-151

- Of the most modest alterations to the Portage Bay Bridge, in the old Four-Lane Alternative, the 2005 *Visual Quality and Aesthetics Discipline Report* says that the new bridge would shift to the north and be 10 to 20 feet higher and about 50 feet wider than the current 54-foot-wide bridge and that the change in scale would be **very noticeable** to motorists and to viewers looking at the bridge anywhere in the Portage Bay basin. The 2005 *Visual Quality and Aesthetics Discipline Report* also observes that the northward placement of the bridge would **noticeably change** the view eastward from Roanoke Park homes north of the bridge by encroaching on their views to the south. It goes on, "Sound walls in the Portage Bay/Roanoke Park area would result in **very high changes to the visual character of SR 520 and to the quality of views from and toward the roadway.** At 18 to 22 feet along North Capitol Hill, the walls would drastically and negatively alter the motorist's experience and could block views from residences adjacent to the wall. A 10-foot-high sound wall could encroach on Bagley Viewpoint and obstruct views to the south."

C-008-152

- Of the view from outside the roadway of the Four-Lane Portage Bay Bridge, the 2005 *Visual Quality and Aesthetics Discipline Report* said, "the addition of 8- to 10-foot-high sound walls on the south side of the Portage Bay Bridge would create **a profile that is very different from [that of] the existing bridge. The walls, in combination with the taller girders and the greater bridge width, would make the bridge structure more massive and box-like, and would greatly increase the visual presence of the bridge.** Moreover, the sound walls would not be consistent with the Scenic Route classification of SR 520 from the driver's viewpoint because the high sound walls would block lateral views outward from the roadway and would partially obstruct long-distance views of the Cascades." (Note that according to a February 1, 2010, letter from Julie Meredith, P. E., SR 520 Program Director, WSDOT, and Randolph Everett, Major Projects Oversight Director, FHWA, the designs for Options A and L now include noise walls on both the north and the south sides of the Portage Bay Bridge.)
- Of the Six-Lane Alternative (before Options A, K, and L had been developed and before Roanoke Park had become the Roanoke Park Historic District), the 2005 *Visual Quality and Aesthetics Discipline Report* said that "sound walls in [the] Roanoke Park [Historic District] would be 12 to 14 feet high on the south side of the highway." It's not clear whether sound walls will also be on the north side of the highway.
- Of a new Bagley Viewpoint to be designed into the 10th & Delmar lid in the Six-Lane Alternative (before Options A, K, and L had been developed), the 2005 *Visual Quality and Aesthetics Discipline Report* said that **the placement of 10-foot-high sound walls near the viewpoint could affect the view.**

C-008-153

- The 2005 *Visual Quality and Aesthetics Discipline Report* also said that in the Six-Lane Alternative (Options A, K, and L had not yet been developed) "vegetation below Bagley Viewpoint and in 50-foot-wide swaths on the north and south sides of the roadway would be removed."

appropriate comments and corrections and revises a number of previous effects findings.

C-008-091

The requested revision was not made because this format, used to list the architects represented in the Roanoke Park Historic District, maintains the reader-friendly style that is consistent with other WSDOT documents. No architects were added to the list.

C-008-092

No additional information about the contributing architects of the Roanoke Park Historic District, or supporting information for the district's eligibility, is included in this section of the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS). For additional information pertaining to the Roanoke Park Historic District, please see the nomination form in Attachment 4 of the Cultural Resources Discipline Report, as well as in the Final Cultural Resources Assessment and Discipline Report.

C-008-093

This was revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-094

Please see the response to comment C-008-091, which states that the Final Cultural Resources Assessment and Discipline Report incorporates appropriate comments and corrections and revises a number of previous findings.

C-008-095

WSDOT has verified that there are no elms planted in the existing

C-008-154

- o The 2005 *Visual Quality and Aesthetics Discipline Report* observed that in the Six-Lane Alternative [before Options A, K, and L had been developed], **“the Portage Bay Bridge would be more than twice the width [even wider in the seven-lane Option A] but similar in style”** and that **the northward alignment and added width would have a moderate to high visual quality effect on views toward and from the roadway.** The report also observed that **“the roadway would be within 70 to 100 feet of a few homes just below the Bagley Viewpoint”** and that **“the view eastward from Roanoke Park homes would noticeably change because of proximity of the Portage Bay Bridge.”** The 2005 *Visual Quality and Aesthetics Discipline Report* of course does not say how much closer the then unplanned seven-lane Portage Bay Bridge of Option A would be to the homes below the Bagley Viewpoint or how **much more noticeably** the view eastward from Roanoke homes would change under the seven-lane Option A.

C-008-155

- The 2005 *Visual Quality and Aesthetics Discipline Report* added, **“sound walls on the south [and now north?] side[s] of the Portage Bay Bridge would compound the visual effects of the taller girders and make the highway structure appear more massive when seen from viewpoints outside of the roadway.”**²

C-008-156

- 170, first para What would be the effect of **variable tolling** in the No Build Alternative, considering both tolling SR-520 alone and tolling I-90 as well as SR-520? Tolling is expected to begin in spring 2011, which means it will initially take place on the four-lane bridge.

C-008-157

- 172 The “6-Lane Alternative” head is out of date. Option A has seven lanes on the Portage Bay Bridge with noise walls. Option K has six lanes on the Portage Bay Bridge with quieter pavement. Option L has six lanes on the Portage Bay Bridge with noise walls.

C-008-158

- 172 Note that the 10th Avenue East & Delmar Drive East lid would visually shield the Roanoke Park Historic District from the wider roadway beneath the lid but that it would not visually shield the Roanoke Park Historic District from the wider and higher Portage Bay Bridge moved north in front of the Roanoke Park Historic District.

C-008-159

- 172, third para, second and third sentences The Andrew Gunby House would not be shielded from noise by the 10th & Delmar lid, nor would it be visually shielded by the lid.

C-008-160

- 172, end of third para Include quieter pavement data here, too.

C-008-161

- 172, ff Were noise levels measured at bedroom height?

C-008-162

- 173 Note that the width of the Portage Bay Bridge would be greater in Option A and that whether sound walls are used would affect the profile of the Portage Bay Bridge.

C-008-163

- 173, next to last para Many more contributing (and individually eligible) houses than those mentioned have views of the Portage Bay Bridge, and those views would be adversely affected by the wider, higher Portage Bay Bridge moved north: houses on the east side of East Shelby Street, for instance, and houses at the intersections of East Hamlin Street and East Edgar Street with the east side of Broadway Avenue East and the west side of 10th Avenue East. See the earlier discussion of contributing and individually houses that enjoy these views in the Construction Effects part of these comments, pp 28–31.

² In a letter dated February 1, 2010, Julie Meredith, P. E., SR 520 Program Director, and Randolph Everett, FHWA Major Projects Oversight Manager, say that “If noise walls are included on the Portage Bay Bridge under any option, they would run the entire length of the bridge on both sides.” Still to be examined as an alternative to the visual blight of noise walls is the use of quieter pavement, not as mitigation, which the FHWA does not endorse, but as an integral part of any design adopted.

southern curb beds of Roanoke Park, therefore the requested change was not made.

C-008-096

The requested revision and inclusion of additional photographs has not been made. For information about the historic district and photographs of historic properties in the Roanoke Park Historic District, please see the NRHP Nomination Form in Attachment 4 of the Cultural Resources Discipline Report and in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-097

Under the Variable Tolling Project, WSDOT will toll the Evergreen Point Bridge beginning in 2011. The purpose of the toll is to reduce congestion and improve travel time, speed, and reliability and to generate revenue for the SR 520 corridor, subject to legislative appropriation.

C-008-098

For Options A, K and L, the areas near the I-5 and SR 520 interchange and between I-5 and the Portage Bay Bridge were the same and would have had similar effects on historic properties.

Since the SDEIS was published, WSDOT has identified a Preferred Alternative. The Preferred Alternative reduces the adverse effect on historic properties in the APE from the SDEIS options. The Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) analyzes the effect from the Preferred Alternative and does not revisit the discussion of Options A, K and L.

C-008-099

This language is revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS). In accordance

C-008-164

- 173, last para An out-of-scale six- or seven-lane higher bridge running beside notable buildings such as the John Graham, Sr.–designed terra-cotta and brick NOAA Fisheries Building and the diminutive John Graham, Sr., Seattle Yacht Club would have an adverse effect on views of those historic buildings, and the scale of the project would visually intrude on views of Portage Bay from many contributing and individually eligible properties in both the Roanoke Park Historic District and theas yet not fully surveyed Portage Bay neighborhood. These historic resources are noted for their views. **The foreseeable effects of the new project added to past and present effects would be a cumulative adverse effect.**

C-008-165

- Once again, note that the operation effects, like the demolition and construction effects, vary in the three options. And note again that Option A is according to WSDOT “the seven-lane option.” The report should treat historic resources in the area between I-5 and Portage Bay as it does the historic resources in the neighborhoods east of Portage Bay with respect to effects from operation of the three different options.
- Discuss operation effects on historic resources in the Roanoke Park Historic District and historic resources in the Portage Bay neighborhood from all three options in the sections devoted to Option A, Option K, and Option L as is done for other historic resources and the other historic district in the APE in this section on the effects of operation of the three different options.

C-008-166

- 174, first para, last three sentences: “Only a small portion of the district has a view of [34 of 80—more than one-third of contributing—and 26 of 57—almost half of individually eligible houses] and would be adversely affected by, the replacement bridge. In addition , there is already a bridge there, so its [higher and wider] replacement [moved farther north in front of historic residences] would not be a substantial change from existing conditions. Therefore, the visual effect from the new bridge would not be an adverse effect.” The “therefore” based on false representation of the number of contributing and individually eligible historic resources in the district that have views of the Portage Bay Bridge and on the imprecise words “would not be a substantial change” is not earned. **The new bridge’s greater height and width moved farther north in front of more homes added to past and present effects would be a cumulative adverse effect.**

C-008-167

- 174, bulleted list of effects on the Roanoke Park Historic District needs to consider the effects separately of the seven-lane Option A and the six-lane Options K and L and the effects if the building of the lids is deferred in the Phased Implementation scenario, said in the *SDEIS* to be the most likely scenario.

C-008-168

- 174, last para, third sentence The seven-lane Portage Bay Bridge of Option A is said to be 35 feet wider than the existing bridge. On p 181, second para, first sentence, the six-lane Portage Bay Bridge of Option K is said to be “approximately 35 feet wider than the existing bridge.” Which one will be 35 feet wider—the six-lane or the seven-lane?

C-008-169

- 175, second para, third to last sentence “Only a small portion of the district has a view of, and would be visually affected by, the replacement [Portage Bay] bridge” is simply not true. See the itemized discussion of the number and the status (contributing and individually eligible) of resources from which views east are enjoyed above, pp 30–31, in the Construction section of these comments.

C-008-170

- 175, second para The last three sentences repeat the specious reasoning re the wider and higher new Portage Bay Bridge from p 174: the infamous “there is already a bridge there, so its [wider and higher] replacement [moved north] would not be a substantial change from existing conditions” denies the definition of cumulative effects and denies the effects finding of the 2005 *Visual Quality and Aesthetics Discipline Report*. (“Would not be substantial” is not substantiated here or elsewhere.)

with the Section 106 consultation process, WSDOT submits all effects findings and determinations to the State Historic Preservation Officer (SHPO) for comment and concurrence.

C-008-100

The potential effect of the Preferred Alternative was thoroughly analyzed prior to publication of the Final EIS.

WSDOT has established more frequent communication with Section 106 consulting parties and has worked to create a forum for idea exchange and discussion of potential effects. WSDOT met with Section 106 parties on a number of occasions throughout 2010 and 2011. Throughout the Section 106 consultation process, WSDOT worked with the Section 106 consulting parties to identify potential adverse effects from the project on historic properties and to outline specific measures to resolve those effects.

This process culminated in the creation of a Programmatic Agreement (Attachment 9 to the Final EIS), which stipulates the measures agreed to by the Section 106 consulting parties to mitigate the project's adverse effect. The Programmatic Agreement also sets the terms and conditions that will be followed for coordination with the Section 106 consulting parties after the Final EIS and NEPA Record of Decision are issued.

C-008-101

Please see the response to Comment C-008-084, which states that the options evaluated as part of the SDEIS would have had similar effects on historic properties between I-5 and the Portage Bay Bridge.

C-008-102

The Cultural Resources Discipline Report stated that the Chung House and Talder House would have the potential to experience increased

C-008-171

- 175, last para and 176, first para Changes from the second bascule bridge of Option A to the watery setting and feeling of the delicate span of the Montlake Bridge would also be an adverse effect on views of the historic Carl F. Gould Montlake Bridge from the Roanoke Park Historic District and the Portage Bay neighborhood, including unsurveyed historic resources in the Portage Bay neighborhood. Note that residents of these neighborhoods walk down to East Shelby Street to enjoy the most spectacular view of the Montlake Bridge and Montlake Cut that they have partial views of from their own homes.

C-008-172

- 175, third para The Montlake Bridge is a part of the view from more houses than “on 10th Avenue East between East Hamlin and East Shelby Street.” Large, tall houses along the east and west sides of East Shelby Street and at intersections on Broadway Avenue East and the west side of 10th Avenue East enjoy views of the Montlake Bridge as well. Again a diminution of the number and a disregard for the contributing and individually eligible status of historic resources leads to a finding of no adverse effect in a district known for its spectacular views, where spectacular views contribute “substantially” to setting and feeling.
- 175, third para “Although it would affect the setting and feeling of **this edge of the district** and of these contributing [!] properties, this effect would not be adverse” under-represents the number of affected properties and those that are both contributing and individually eligible. More resources than those at this “edge” of the district would be affected by the adverse effects on views. The finding that “this effect would not be adverse” is not substantiated in any way.
- 177, third para “primarily visible from the rear of houses on 10th Avenue East” condescends to the decks, terraces, living rooms, and upstairs rooms from which the view is enjoyed along the east side of 10th Avenue East and under-represents the number of contributing and individually eligible historic resources from which the view is enjoyed, including many views from the fronts and sides of houses at intersections.

C-008-173

- 177, third para “The width of Portage Bay geographically separates the Montlake Bridge from the Roanoke Park Historic District” seems like an obvious observation. And of course the views across the beautiful waters of the bay and the cut to the delicate span are prized. Is the remark about the geographic separation meant to suggest that the viewer must be on top of the bridge or underneath it or beside it in order to enjoy views of it? The watery expanse before the view of the bridge is part of the charm of the view from one of the neighborhood’s beloved viewpoints.

C-008-174

- 179, bulleted list The following items similar to the bulleted list of operation effects on the Montlake Historic District describe operation effects on the Roanoke Park Historic District and on historic resources, both surveyed and unsurveyed in the Portage Bay neighborhood:
 - “Change to setting caused by wider Portage Bay Bridge”
 - “Change to setting caused by new bascule bridge”
 - “Change to setting caused by widened roadway” on East Roanoke Street
 - “Change to setting” by diminution of Bagley Viewpoint and vegetation removal for widening of the SR 520 roadway “resulting in some loss of landscaped buffer” for the Gates-Bass Mansion and historic houses along at least the 2600 block of 10th Avenue East and Broadway Avenue East and possibly more contributing and individually eligible historic residences in the south part of the district
 - Beneficial change to setting from introducing lid over I-5 at East Roanoke Street and over SR 520 between 10th Avenue East and Delmar Drive East—if the lids are constructed. The statement in the *SDEIS* that the Phased Implementation scenario, with its indefinite

noise, fugitive dust, and possible vibration from construction activities to rebuild the I-5/SR 520 interchange and add the new HOV ramp. These construction impacts will be addressed through the stipulations set forth in the Programmatic Agreement (Attachment 9 to the Final EIS) and Community Construction Management Plan (outlined in Attachment 9 to the Final EIS).

C-008-103

Please see the response to Comment C-008-084, which states that the options evaluated as part of the SDEIS would have had similar effects on historic properties between I-5 and the Portage Bay Bridge.

C-008-104

Although the Preferred Alternative would incorporate the Bagley Viewpoint into the 10th Avenue and Delmar Drive lid, WSDOT does not have any plans for construction staging in that area and thus would not block access to Roanoke Park or contributing resources in the historic district. However, the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) does state that noise, fugitive dust, and possible vibrations from demolition of the 10th Avenue East and Delmar Drive East overcrossings and construction of the new lid will have an indirect effect on the Roanoke Park Historic District. These indirect effects may slightly alter the integrity of the historic district, but the stipulations in the Programmatic Agreement would ensure that adjacent construction would not diminish the district's integrity.

C-008-105

The design of the Preferred Alternative would acquire 0.03 acre of land from Fire Station #22. This acquisition would not affect the historic building, and it would not impact usage or access to the property. Please see the Final Cultural Resources Assessment and Discipline Report

C-008-174

deferral of lids, is the most likely scenario throws the prospect of timely lid construction into doubt.

- o To be added: Adverse multiple and cumulative effects on setting from increased noise, air pollution, vibration, and nighttime traffic glare from a wider highway with more vehicle traffic, particularly from operation of the seven-lane Portage Bay Bridge.
- o To be added: Adverse secondary, indirect, effects from perceptions of desirability and healthy livability from the direct effects and a consequent change to setting and feeling and characteristic use of the historic district and the historic resources in the Portage Bay neighborhood.

C-008-175

- These effects and others mentioned on pages 4 through 7 of these comments should be mitigated through stipulations outlined in a Memorandum of Agreement.

C-008-176

- 173–174 See the discussion of the 2005 *Visual Quality and Aesthetics Discipline Report* above for its perspective on the **high contrast changes** that even a four-lane or a six-lane alternative would lead to. The minimizing discussion and conclusions here are at the very least debatable, out of touch with the very real adverse effects of Option A’s seven-lane-wide and higher Portage Bay Bridge with noise walls, moved farther north, on **views** from more of the historic resources than those along the east side of 10th Avenue East. Similar adverse effects would result from the wider and higher six-lane Portage Bay Bridge of Options K and L moved north. Correct the information in the passage here, and move the discussion into the following Option A, Option K, and Option L sections.

C-008-177

- The East Edgar Street, East Hamlin Street, and East Shelby Street hills continue to slope at the top of the Roanoke Park Historic District plateau from the east side of 10th Avenue East to the plateau’s high point along Broadway Avenue East. Residents in the large houses at intersections of the Roanoke Park Historic District as far west as the west side of Broadway Avenue East enjoy views east variously including Portage Bay, the historic Fisheries Building, the historic Seattle Yacht Club and marinas, the historic Montlake Cut, the historic Montlake Bridge, Lake Washington, the lights of Bellevue and Kirkland, trees in the foothills, and the Cascade Mountains.
 - o Houses from which these views may be enjoyed include most obviously the contributing and individually eligible Gates-Bass Mansion at 1018 East Roanoke Street (A and C, Elmer E. Green, 1909) and most of the houses along the east side of 10th Avenue East: the contributing Gifford House (1924) at 2612, the contributing Fish House (1922) at 2616, the contributing Bogue House (1923) at 2622, the contributing Bloxom House (1917) at 2632, the contributing Horner House (1925) at 2636, the contributing and individually eligible Beckwick-Thompson House (A and C, 1910) at 2700, the contributing and individually eligible Parshall House (C, Thomas L. West, 1911) at 2706, the contributing and individually eligible Siegley House (C, 1909) at 2712, the contributing and individually eligible Cavanaugh House (C, E. H. Sanders, 1909) at 2722, the contributing Conly House (1916) at 2726, the contributing and individually eligible Mayer House (C, Hunt & Wheatley, 1924) at 2802, the contributing and individually eligible Spencer House (C, Ed Merritt, 1909) at 2808, the contributing Turner House (C, 1903) at 2812, the contributing and individually eligible Richardson House (A and C, Julian G. Everett, 1912) at 2816, the contributing and individually eligible Phillips-Hyde House (C, Huntington & Gould, 1909) at 2822, the contributing and individually eligible Higgins House (A, 1909) at 2832, and the contributing and individually eligible Patten House (A and C, 1909) at 2836. All of these contributing and individually eligible resources would suffer degradation of their views and increased noise from the operation of Option A’s seven-lane Portage Bay Bridge and second bascule bridge, not only from the sight of the massive Portage Bay Bridge, with its increased height and view-blocking noise walls, but also from the impairment by the

(Attachment 7 to the Final EIS) for further discussion of the Fire Station #22.

C-008-106

As stated in the Final Cultural Resources Assessment and Discipline Report, WSDOT seeks to minimize effects on mature tree growth within the WSDOT right-of-way. As a general WSDOT policy, when WSDOT crews are directed to remove vegetation on a project site, they will also remove any invasive species on the site. This extra effort benefits existing vegetation in adjacent neighborhoods.

This paragraph was revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) to increase clarity.

C-008-107

Please see the response to Comment C-008-052, which states that the Roanoke Park Historic District’s characteristics of integrity may be altered by construction and operation of the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. However, implementation of the Programmatic Agreement (Attachment 9 to the Final EIS) and the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS) would resolve the adverse effect from the project. The Community Construction Management Plan will reduce construction impacts and will include stipulations such as retaining existing vegetation whenever possible and restoring areas where vegetation was removed, to existing or better conditions, after construction is completed.

C-008-108

Roadside plant materials are selected with specific purpose according to federal and state laws. The roadside is a component of the transportation facility and function to promote traffic safety, provide erosion control and water quality, as well as provide visual screening and

C-008-177

second bascule bridge of views of the delicate span of the Carl F. Gould Montlake Bridge. (Note that the views east of the Booth and Dalley houses at the south end of the historic district are impeded by trees and other houses.)

- o The four houses on the north side of East Shelby Street at its east end that enjoy these views are the contributing and individually eligible Prosser-Dowling House (A and C, Hunt & Jones, 1909) at 912, the contributing and individually eligible Slater House (C, 1910) at 920, the contributing and individually eligible Ross House (A and C, 1912) at 926, and the contributing Dart House (1909) at 1000. On the south side of East Shelby Street, the contributing and individually eligible Twelves House (A and C, Edwin J. Ivey, 1923) at 817, the contributing and individually eligible Denny House (A and C, 1910) at 2838 Broadway Avenue East, and the contributing Sutherland House (1908) at 2837 10th Avenue East also enjoy these views.
- o On the north and south sides of East Hamlin Street, the contributing and individually eligible Sullivan-Walker House (A and C, 1899—the oldest house in the district) at 2736 Broadway Avenue East, the contributing and individually eligible Finley House (A and C, 1909) at 2731 10th Avenue East, the contributing and individually eligible Hunter House (A and C, Frederick A. Sexton, 1909) at 2801 Broadway Avenue East, the contributing and individually eligible Johanson House (A, and C, attributed to Cutter & Malmgren, 1909) at 2800 Broadway Avenue East, and the contributing and individually eligible Wentworth-Elliott House (A and C, Merritt, Hall & Merritt, 1910) at 918 East Hamlin Street enjoy these views east as well.
- o As do the contributing and individually eligible Neterer House (A and C, Andrew Willatsen, 1915) at 2702 Broadway Avenue East and the contributing and individually eligible Saunders House (A and C, Frederick A. Sexton, 1908) at 2701 10th Avenue East. (Other houses along the west side of 10th Avenue East have partial views of Lake Washington and the Cascades from their high vantage points.)

C-008-178

- All of these historic resources in the Roanoke Park Historic District would suffer permanent damage to setting and feeling and characteristic single-family use from the visual blight, pollution, noise, and nighttime glare at various sites during operation of the project.

Operation, Option A

C-008-179

- 174 Option A, Historic Built Environment head Moving from west to east, discuss the permanent effects of Option A operation on the area between I-5 and Portage Bay, presently omitted. Discuss historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood including the unsurveyed historic resources on the north and south hillsides of Delmar Drive East that would be adversely affected by the permanent operation of Option A's seven-lane Portage Bay Bridge, higher and moved north, with sound walls, which adverse effects would include visual blight, noise, vibration, air pollution and consequent building exterior erosion and soiling, dusty windows, damage to landscaping from air pollution and vibration, nighttime glare, and the loss and damage of vegetation.

C-008-180

- Note that the east end of the Roanoke Park Historic District, including the contributing and individually eligible Gates-Bass Mansion and the contributing and individually eligible houses along 10th Avenue East would suffer permanent blocking of views south from noise walls on the north and south sides of the Portage Bay Bridge. (See the 2005 *Visual Quality and Aesthetics Discipline Report*.)
- Visitors to the new, much diminished Bagley Viewpoint would have their views permanently impeded by a ten-foot-high noise wall on the south side of the Viewpoint. (See the 2005 *Visual Quality and Aesthetics Discipline Report*.)

habitat for birds and small mammals. To accomplish these functions WSDOT complies with the Native Wildflower Act by using native and drought-tolerant plant materials. Through the Section 106 consulting party coordination process as described in the Programmatic Agreement (Attachment 9 to the Final EIS), WSDOT would work to employ context sensitive design to blend with the adjacent historic district to the degree possible. The design of buffering vegetation would not be a product of the Section 106 consultation process.

C-008-109

These detours have been eliminated from the project. There are no potential detours in or around the Roanoke Park Historic District. The only potential detour that remains as part of the project redirects traffic onto 24th Avenue East and to Montlake Boulevard for access off of SR 520.

C-008-110

The design plan submitted by the Portage Bay/Roanoke Park Historic District was received and considered by WSDOT. WSDOT considered this plan while designing the intersection at 10th Avenue East and East Roanoke Street. WSDOT continues to work with the Roanoke Park Historic District and the City of Seattle to ensure that design elements at this intersection, on a street adjacent to the historic district, are context sensitive.

C-008-111

Although access to a few historic properties along East Roanoke Street could be temporarily blocked, the closures would be brief and intermittent. The lane realignment, which would cause the access restrictions, would only include short-term closures during off-peak times over the course of 15 months. However, at least one lane would be open at all times to allow local traffic access on East Roanoke Street.

- C-008-181** | • Note that the 10th & Delmar lid will end at the current Bagley Viewpoint and that the historic resources in the Portage Bay neighborhood north of the new Portage Bay Bridge, including many as yet unsurveyed houses, would have no buffering from the visual blight, noise, air pollution and consequent building exterior erosion and soiling, damage to landscaping from air pollution and vibration, dusty windows, vibration, nighttime traffic glare, and the loss and damage of vegetation in operation of the seven-lane Portage Bay Bridge of Option A.
- C-008-182** | • In operation, degradation in Option A of the views for which the Roanoke Park Historic District is noted would have a permanent adverse effect on the Roanoke Park Historic District. Historic resources in the Portage Bay neighborhood, including unsurveyed historic resources on the hills along the north and south sides of Delmar Drive East, in the houseboat community, and along both sides of Fuhrman-Boyer Avenue East would suffer permanent adverse effects on views as well.
- C-008-183** | • 174, last para second and third sentences. Says “The new Option A Portage Bay bridge would be seven lanes wide, with an overall width of at least 108 feet, which is 35 feet wider than the existing bridge.” Check the present width of the Portage Bay Bridge (54 feet?) and check the projected width in Option A of the Portage Bay Bridge. The 2005 *Visual Quality and Aesthetics Discipline Report* says that the Portage Bay Bridge would be 50 feet wider than the present bridge in the Four-Lane Alternative. The new width of a seven-lane bridge would be much wider than the new width of the Four-Lane Alternative, and the seven-lane bridge would be more than the 35 feet wider than the existing bridge that the *Cultural Resources Discipline Report* claims here.
- C-008-184** | • The eventual operation of a massive seven-lane bridge with sound walls, a bridge that will be higher than the present bridge, shifted farther north, and more air polluting causing erosion and soiling of historic resources, would be a permanent adverse effect on contributing and individually eligible historic resources in the Roanoke Park Historic District and on individually eligible resources in the Portage Bay neighborhood.
- C-008-185** | • None of the contributing and individually eligible properties in the Roanoke Park Historic District are noted in Option A operation effects findings even though they will be adversely affected by the operation of the new Portage Bay Bridge, which in addition to being higher and more than twice as wide with noise walls will be moved to the north in front of more homes in the Roanoke Park Historic District—even though contributing historic resource status and individually eligible property status in the Montlake Historic District are routinely brought to bear on operation effects findings.
- C-008-186** | • In operation, the second bascule bridge would permanently detract from the delicate span of the Carl F. Gould Montlake Bridge visible from many contributing and individually eligible historic houses in the Roanoke Park Historic District. This view is prized by walkers through the district as well.
- C-008-187** | • Considering in toto these multiple operation effects and the multiple long-term demolition and construction effects of Option A on contributing and individually eligible resources discussed earlier in these comments one would conclude that the Roanoke Park Historic District would be adversely affected by changes to the setting and feeling of the district and its single-family characteristic use.
- C-008-188** | • Considering in toto the multiple effects from the operation and construction of Option A on individually eligible historic resources in the Portage Bay neighborhood, one would conclude that these eligible historic resources would be adversely affected by changes to their setting and feeling and changes from their characteristic single-family use. Note that individually eligible historic resources along both sides of Fuhrman-Boyer Avenue East including those in the houseboat community, among the bungalows along East Gwinn Street and historic resources and historic resources along the steep hillsides on the north and south sides of Delmar Drive East have not

During this time, at least one access point, although possibly the secondary access point, would be maintained for these four houses.

C-008-112

The Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) states that the potential haul routes would have an indirect effect on the Roanoke Park Historic District and the William H. Parsons House. The properties along the potential haul routes could experience higher traffic volume, fugitive dust, and increased noise from the intermittent truck traffic along these haul routes. WSDOT is working with the Section 106 consulting parties to develop a Community Construction Management Plan (outlined in Attachment 9 to the Final EIS), which will include measures to minimize effects from hauling.

C-008-113

A Community Construction Management Plan (outlined in Attachment 9 to the Final EIS) is being developed, in coordination with the Section 106 consulting parties and other affected community members, to outline the mitigation and minimization measures and best management practices that will be used to reduce the effects of hauling.

C-008-114

Since publication of the SDEIS, WSDOT has refined potential haul routes to avoid using non-arterial neighborhood streets. Local jurisdictions can limit the use of non-arterial streets for truck traffic; therefore, efforts were made to identify designated arterial streets for potential use as haul routes. Fuhrman Avenue East and Boyer Avenue East are still both designated as potential haul routes, however the Boyer Avenue East haul route has been revised. Please see the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) for further discussion about how the haul routes may

- C-008-188** | been identified in the *Cultural Resources Discipline Report's* survey of historic resources in the Portage Bay neighborhood.
- C-008-189** | *Operation, Option K*
- 181, second para Moving from west to east, discuss the effects of Option K operation on the area between I-5 and Portage Bay, presently omitted. Discuss historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood including the unsurveyed historic resources on the north and south hillsides of Delmar Drive East that would be adversely affected by the permanent operation of Option K's six-lane Portage Bay Bridge, which include visual blight, noise, vibration, air pollution and consequent building exterior erosion and soiling, damage to landscaping from air pollution and vibration, dusty windows, nighttime traffic glare, and vegetation removal and damage. Refer to the discussion above of the 2005 *Visual Quality and Aesthetics Discipline Report's* findings with respect to adverse effects on views from even the old Four-Lane Alternative and from the wider old Six-Lane Alternative.
- C-008-190** |
- At six-lanes, Option K's Portage Bay Bridge with no noise walls would not be as damaging in its operation effects on views as Option A's seven-lane Portage Bay Bridge with noise walls. See the earlier discussion of effects on views from Option A. Six lanes, higher and wider and moved farther north would still have a noticeable effect on views, however. Speak also to the noise reduction effects of the quieter pavement designed into Option K.
- C-008-191** |
- 181, second para Note that the 10th & Delmar lid ends at the current Bagley Viewpoint and that with Option K's quieter pavement and lack of noise walls the historic resources in the Portage Bay neighborhood north and south of the new Portage Bay Bridge, including many as yet unsurveyed historic houses, might have only modest buffering from the noise and no buffering from the vibration, air pollution, eroding and soiling of buildings, dusty windows, and vegetation removal and damage of the six-lane Option K moved closer to these historic resources. The conclusion that the Portage Bay neighborhood historic resources mentioned in this passage would not suffer an adverse effect from the operation of the Portage Bay Bridge moved closer to these resources seems dubious.
- C-008-192** |
- Option K's quieter pavement might mean that operation of the six-lane project would have the adverse effect of increased noise from buses and autos—more so than in the operation of Option A, which includes sound walls. The effects of the two kinds of noise deterrents at bedroom levels need to be studied and included in the *Cultural Resources Discipline Report*. Unlivable historic resources would quickly deteriorate.
- C-008-193** |
- The absence of noise walls and the narrower width of the Portage Bay Bridge would mean that the historic viewshed would be less damaged in Option K than in Option A (or Option L), but viewers of the roadway in the Roanoke Park Historic District and Portage Bay neighborhood would still experience a high contrast between the new views and the present views and thus a cumulative adverse effect from the movement of a wider and higher Portage Bay Bridge farther to the north in Option K (and in Option A and Option L).
- C-008-194** |
- Option K's double tunnel under the Montlake Cut would not have a permanent visual effect on historic resources in the Portage Bay basin. Note that construction of Sound Transit's deep-bore twin tunnel under the Montlake Cut is underway and that staging, excavation, hauling, and construction effects of this project will last until some time in 2016. Understanding that WSDOT will not mitigate this cumulative effect of the construction of the two projects "because it doesn't have jurisdiction over another agency," we do expect WSDOT to coordinate with Sound Transit over the effects of the two projects on historic resources in the Portage Bay basin.
- C-008-195** |
- Option K's lower profile at most sites along the roadway with the exception of the six-lane Portage Bay Bridge, which even then would have a lower profile thanks to the absence of noise walls, would make it the least damaging option as far as views are concerned.

indirectly affect historic properties. Chapter 6 of the Final EIS and the Final Transportation Discipline Report (Attachment 7 to the Final EIS) include more specific information about haul routes, volumes, duration, and scheduling.

Local jurisdictions will determine final haul routes for those actions and activities that require a street use or other jurisdictional permit. The permit process typically takes place during the final design phase and prior to construction.

WSDOT has reported average haul truck numbers for each route, and for routes where truck volumes may vary substantially over the construction period, peak volumes were also provided. In many cases, the projected trips have been compared against the existing trip count.

C-008-115

WSDOT is working with the Section 106 consulting parties and other affected community members to develop a Community Construction Management Plan (outlined in Attachment 9 to the Final EIS) that will include mitigation and minimization measures and best management practices that will be used to minimize or avoid the impacts from temporary closures and haul routes.

C-008-116

Please see the response to Comment C-008-084, which states that the options evaluated as part of the SDEIS would have had similar effects on historic properties between I-5 and the Portage Bay Bridge.

C-008-117

References to the William H. Parsons House have been revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS), where appropriate.

- C-008-195**
 - The absence of noise walls and the use of quieter pavement, however, might have an adverse effect in the form of noise, vibration, air pollution, and nighttime traffic glare in operation of Option K.
 - Taking the multiple construction and operation effects in toto, one concludes that even the least damaging Option K would have an adverse effect on these historic resources and require a Memorandum of Agreement.
- C-008-196**

Operation, Option L

 - 185, second para Moving from west to east, discuss the permanent effects of Option L operation on the area between I-5 and Portage Bay, presently omitted. Discuss historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood including the individually eligible historic resources on the north and south hillsides of Delmar Drive East that would be adversely affected by the permanent operation of Option L's wider and higher Portage Bay Bridge with noise walls, moved farther north, which include visual blight, noise, vibration, air pollution and consequent building exterior erosion and soiling, dusty windows, damage to landscaping from air pollution and vibration, nighttime traffic glare, and vegetation removal and damage. Refer to the discussion above of the 2005 *Visual Quality and Aesthetics Discipline Report* for its perspective on the high contrast with present views that would be a result of even the Four-Lane Alternative and of Option L's Six-Lane Alternative moved farther north and with noise walls.
- C-008-197**
 - Option L's six-lane Portage Bay Bridge with its noise walls would be almost as massive and almost as damaging in its operation effects as Option A's seven-lane Portage Bay Bridge. See the earlier discussion of these effects with respect to Option A, and include them here.
 - Note that the east end of the Roanoke Park Historic District, including the Gates-Bass Mansion, the contributing and individually eligible houses along 10th Avenue East, and contributing and individually eligible houses at some of the Roanoke Park Historic District's intersections would suffer view blocking 8-to-10-foot noise walls along the north and south sides of the Portage Bay Bridge.
 - Option L's noise walls would have a permanent adverse effect on views from historic resources in the Portage Bay neighborhood as well.
- C-008-198**
 - 186, first para See discussions of the views and which of many contributing and individually eligible resources in the Roanoke Park Historic District enjoy these views east earlier in these comments (pp 26–29), and change this statement that “only a small portion of the district has a view of, and would be visually affected by, the replacement bridge [the replacement Portage Bay Bridge]. In addition there is already a bridge there, so its replacement would not be a substantial change from existing conditions. Therefore the visual effect from the new bridge would not be an adverse effect on the Roanoke Park Historic District or its contributing elements.” The movement north of the wider, higher bridge with noise walls would affect views from a substantial number of contributing (34 contributing resources, more than a third) and possibly individually eligible (a preliminary count of 26—almost half) resources in the Roanoke Park Historic District that currently enjoy the “expansive” views of “high vividness” that contribute to the setting and feeling as well as the single-family use of resources in the district.
- C-008-199**
 - We object to the minimization of the number of contributing (and individually eligible) historic resources in the district whose desirability would be affected by permanent degradation of these views.
- C-008-200**
 - We object again to the cavalier and oft-repeated conclusion that “there is already a bridge there, so its [wider, higher, with noise walls, moved farther north] replacement would not be a substantial change from existing conditions.” See the 2005 *Visual Quality and Aesthetic Discipline Report*,

C-008-118

Construction of an enhanced bicycle and pedestrian path on the East Roanoke Street Bridge and the construction process for the 10th Avenue and Delmar Drive lid has been discussed with the Section 106 consulting parties throughout the Section 106 process. WSDOT worked with the Portage Bay/Roanoke Park Community Council and other Section 106 consulting parties to develop the Programmatic Agreement, which would resolve the project's adverse effect on historic properties, and is also developing a Community Construction Management Plan (outlined in Attachment 9 to the Final EIS).

The Community Construction Management Plan will outline measures to reduce construction-related effects, including items such as best management practices to minimize construction noise, dust, and visual quality, limitations on daily construction work windows, provisions to minimize the potential impact from haul routes, special protective measures for facilities determined to be at risk from vibration, and measures designed to protect the setting and integrity of historic properties and districts.

C-008-119

A temporary roadway would be constructed adjacent to the 10th Avenue East Bridge and would allow access to Delmar Drive East, except for brief and intermittent closures during off-peak hours.

C-008-120

The Preferred Alternative does not include a landscaped lid over I-5; instead, the design includes an enhanced bicycle and pedestrian path to be constructed on the existing East Roanoke Street overcrossing. To expedite the construction schedule, the construction of this bicycle and pedestrian path would be concurrent with the construction of the 10th Avenue East and Delmar Drive East lid. The 10th Avenue East and Delmar Drive East lid would be finished and landscaped as soon as all of

- C-008-200 | which concluded that even a new four-lane or six-lane Portage Bay Bridge with noise walls would appear massive and produce a great alteration to the extent and the nature of views from all sites in the Portage Bay basin.
- C-008-201 | • Operation of Option L's second bascule bridge some distance east of the Montlake Bridge would be unlikely to have permanent adverse effects on views of the Montlake Bridge from the historic resources on the west side of the Portage Bay basin. Note, however, that construction of Sound Transit's deep-bore twin tunnel under the Montlake Cut is underway and that visible and audible staging, excavation, hauling, and construction effects of this project would last until some time in 2016.
- C-008-202 | • Option L's elevated profile at most sites along the roadway would have permanent adverse effects on views from the Roanoke Park Historic District and historic resources in the Portage Bay neighborhood.
- C-008-203 | • 190, third para, last sentence The new floating portion of the floating bridge is said to be "slightly higher than the existing floating portion." With a maintenance deck resting on pontoons that rise ten feet out of the water topped by tall columns that are topped by the road deck which in turn is topped by noise walls, the floating bridge would be considerable higher than the current 8 to 10 feet above the water.
- C-008-204 | • 190, last para on Phased Implementation Scenario "As noted earlier, none of these effects [noise and visual effects] would differ substantially from the existing conditions, and none would be considered adverse" is a flawed a conclusion in this context—even moreso now because of lid construction deferral.
- C-008-205 | **Mitigation, p 191**
 - 191, first para Refresh the reader's understanding of direct, indirect, collective or multiple, and cumulative effects here, and refresh the reader's understanding of the technical meanings of avoid, minimize, and mitigate.
- C-008-206 | • 191, second para Why the change from "must" to "may" in the second sentence of the passage "Agency officials must provide the public with information about the project and its effects on historic properties, and seek public comment and input. Agency officials **may** [used to say "must"] involve the public in accordance with the agency's published NEPA procedures for public involvement in order to comply with this aspect of Section 106." Which of these obligations and possible inclinations as described is purely discretionary, so much so that "may" rather than "must" is appropriate?
- C-008-207 | • 191, third para Is data recovery a minimization or a mitigation? Called a minimization here but a mitigation on p 192.
- C-008-208 | • 192, last para Data recovery called a "mitigation" here. These terms remain fuzzy and should have clear definitions with helpful examples and clear, precise use throughout the *Cultural Resources Discipline Report*.
- C-008-209 | • 192, third para "Compensatory mitigation" is used and seems to mean any measure that is not conventional data recovery, at least as far as archeological mitigation is concerned. Is compensatory mitigation open as a mitigation measure for cultural resources and historic resources of the built environment as well? (As on p 193, second bulleted item, in a section on avoiding or minimizing adverse effects on historic properties of the built environment: "Install landscaping or landscaped buffers to **compensate** in those areas where buffer zones are being removed or reduced, and where new or relocated traffic lanes intrude on the character of a historic district or the settings of individual historic properties.") Early installation, during early parts of construction, of landscaped buffering needs to be negotiated in a Memorandum of Agreement.

the structural elements were complete. The construction timeframe in this area is approximately two years.

C-008-121

Please see the response to Comment C-008-003. Lids are considered a major project element and would be built at the same time as the corresponding portion of the corridor.

C-008-122

Impacts resulting from construction of the Preferred Alternative's enhanced bicycle and pedestrian path over I-5 and of the 10th Avenue East and Delmar Drive East lid will be avoided through the measures provided in the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS).

C-008-123

The Cultural Resources Discipline Report stated that the Roanoke Park Historic District may experience indirect effects from construction noise, fugitive dust, and vibration from construction of the work bridges flanking the Portage Bay Bridge, demolition of the existing bridge, and construction of the new bridge. These construction impacts will be avoided, minimized or mitigated through the use of best management practices and through the agreed-upon conditions outlined in the Community Construction Management Plan (Attachment 9 to the Final EIS), included by reference in the Programmatic Agreement (Attachment 9 to the Final EIS).

C-008-124

The Final Cultural Resources Assessment and Discipline Report states that the Roanoke Park Historic District may experience indirect effects from the change in setting and feeling during the construction period from the visual interruptions by the work bridges and construction activity

- C-008-210** | • 193 second bulleted item Removing buffering vegetation should be delayed as long as possible. Replacing removed buffering vegetation should be an early priority, during construction.
- C-008-211** | • 194, first bulleted item Clean buildings (and vegetation) **periodically and as needed**, not just at the conclusion of the long, seven-and-a-half to eight-year project. Also note that operation of more vehicles on the SR 520 highway, on ramps, and exits closer to historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood and on arterials will permanently increase erosion and soiling from air pollution. What can WSDOT do about this adverse effect on historic buildings?
- C-008-212** | • 194 last bulleted item Say “. . . and avoid obscuring views of **and from** historic properties.”
- C-008-213** | • 195, first para, first bulleted item See replacement this iteration of “positive change” for “beneficial effect” in “These measures have a positive change on the adjacent historic properties by reducing anticipated noise.” Reducing anticipated noise is not a positive change. Reducing present noise would be a positive change. Given the increased size and number of lanes in all alternatives of the project and the lack of good data on noise walls collected at bedroom height and the lack of any information on the ability of quieter pavement to reduce noise coming from this expanded highway project, the statement doesn’t have a sound (no pun) basis.
- C-008-214** | • 195 In the order established in the document of moving from west to east, speak first of mitigation in the area from I-5 to Portage Bay including North Capitol Hill, the Roanoke Park Historic District, and the Portage Bay neighborhood including the unsurveyed historic resources on the north and south hillsides of Delmar Drive East, in the houseboat community, and along both sides of Fuhrman-Boyer Avenue East. Then speak of mitigation for the Seattle Yacht Club, mitigation for the Montlake Historic District, etc., moving east. Note again that historic resources in the Portage Bay neighborhood’s houseboat community, the potential historic bungalow district along East Gwinn Street from Harvard Avenue East to Fuhrman-Boyer Avenue East, and other historic resources on both sides of Fuhrman-Boyer Avenue East have not been surveyed and included in the APE. And note again that historic resources on the north and south hillsides of Delmar Drive East, which might or might not have been included in the APE, have not been surveyed.
- C-008-215** | • 195 first para, fourth bulleted item Lids are designed into the project and are not mitigation. Be sure that lids are described in the Introduction, which seems to be the only place where description of the project is taken up. Not much information on the options is provided there. A construction mitigation measure might include early completion and landscaping of lids to protect historic resources from the long seven-and-a-half-year to eight-year construction project.
- C-008-216** | A separate letter will follow, containing recommendations for measures to offset the multiple direct, indirect, and cumulative adverse effects that would be visited on historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood by the construction and operation of the SR 520 Bridge Replacement and HOV project.

related to the Portage Bay Bridge. These indirect effects will be avoided, minimize or mitigated through the use of best management practices and agreed-upon measures outlined in the Community Construction Management Plan (Attachment 9 to the Final EIS), included by reference in the Programmatic Agreement (Attachment 9 to the Final EIS).

C-008-125

References to eligible and contributing resources were revised, where appropriate, in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-126

The impacts to the area between I-5 and Portage Bay from construction of Option A were not omitted, and can be found on pages 135 through 140 of the Cultural Resources Discipline Report. For the areas near the I-5 and SR 520 interchange and between I-5 and the Portage Bay Bridge, the project was the same under each option. Consequently, this analysis was discussed only one time, and is located in the Potential Effects section. Additionally, the analysis contained in the Final Cultural Resources Assessment and Discipline Report is discussed from west to east.

C-008-127

Please see the response to comments C-008-123 and C-008-124, which state that construction impacts would be avoided, minimized and mitigated through the use of best management practices and agreed-upon conditions outlined in the Community Construction Management Plan (Attachment 9 to the Final EIS).

C-008-128

Please see the response to Comment C-008-024, which states that NEPA avoids speculative conclusions.

Erin O'Connor
2612 10th Ave E
Seattle, WA 989102
April 14, 2010

Jenifer Young
Environmental Manager
SR 520 Program Office
600 Stewart Street, Suite 520
Seattle, WA 98101

Dear Ms. Young:

Although we are dismayed at the prospect of adverse effects on our historic resources from the SR 520 Bridge Replacement and HOV Project, we are confident that a fair and accurate consideration of the setting, feeling, and characteristic use of our historic resources and the likely multiple, indirect, and cumulative adverse effects from construction and operation of the project will lead to efforts on WSDOT's part to avoid, minimize and mitigate those adverse effects and to cement understandings in a Memorandum of Agreement. Following are some measures that make sense in light of the nature of these adverse effects during construction and in anticipation of operation.

Construction

- **Construct solid fencing and plant buffering vegetation** to protect historic resources in the Roanoke Park Historic District and historic properties in the Portage Bay neighborhood from the effects of demolition and reconstruction of the three bridges over I-5 on East Roanoke Street and over SR 520 on 10th Avenue East and Delmar Drive East, from the effects of construction of the two new lids, and from the effects of the demolition and reconstruction of the Portage Bay Bridge, which will be moved closer to and in front of more homes in the Roanoke Park Historic District and the Portage Bay neighborhood.
- **Without the lids that have been designed into the project, that are an integral part of the project, and because the "temporary" construction effects would go on for seven and a half to eight years**, these effects on historic resources in the Roanoke Park Historic District and Portage Bay neighborhood would be tantamount to ultimate "demolition by neglect" as property values plummeted, and even then visual blight, noise, dust, vibration, and diesel emissions would mean that people would not be able to sell their homes for amounts approaching their present worth. Many of the houses would be rented out to lower income renters, those not in a position to avoid living so close to a mammoth, many-years-long freeway construction project. Some, perhaps many, of the houses would become rooming houses as happened after the construction of I-5 and SR 520 and the economic decline of the 1970s. As we saw then on the borders of the district, a general deterioration would ensue in the absence of owner-residents who work steadily to improve their historic houses and their communities. Repairs would tend to be done on the cheap, with little regard for the historic integrity that owner-residents have maintained over 100 years. With the deterioration of the social fabric of the neighborhoods, would come a deterioration of the setting and feeling of the Roanoke Park Historic District and of the historic resources in the Portage Bay neighborhood.
- Families with young children especially would be likely to move away to protect their children from the **protracted health effects of a seven-and-a-half-to-eight-year construction project**. A snapshot survey conducted by the Portage Bay/Roanoke Park Community Council reported that 126 young people under the age of 20 live in the district. 79 of these children are under the age of 14. (Because parents are reluctant to reveal this kind of information in today's social climate, the number of young children is probably underreported.)

C-008-129

Please see the response to Comment C-008-120 and C-008-122, which state that WSDOT has drafted a construction timeline for the enhanced bicycle and pedestrian path, as well as the 10th Avenue East and Delmar Drive East lid.

C-008-130

Please see the response to comment C-008-124, which states that construction impacts would be avoided, minimized and mitigated through the use of best management practices and the agreed-upon conditions outlined in the Community Construction Management Plan (Attachment 9 to the Final EIS). WSDOT has determined that the integrity of the Roanoke Park Historic District would not be diminished from construction of the second bascule bridge because of the distance and the landscape features that separates the historic district from the bridge.

WSDOT examined the potential for construction effects of the SR 520, I-5 to Medina project to overlap in time and vicinity with the construction effects of other projects, producing concurrent construction effects. The tunneling referred to in the comment is expected to be completed by mid-2013. Therefore, it would not occur concurrently with construction of the Portage Bay Bridge and new bascule bridge. However, construction of University Station, which is part of Sound Transit's University Link, would overlap with construction of the Portage Bay Bridge and new bascule bridge. WSDOT found that concurrent construction effects on visual quality would not result from the SR 520, I-5 to Medina project together with University Station construction because the two projects would be sufficiently separated by distance. However, the two projects have potential to produce concurrent noise effects from construction. It should be noted that University Station construction would not involve pile driving.

C-008-131

These references to the views from the Roanoke Park Historic District,

C-008-217

- These would be serious indirect adverse effects on the single-family with children demographic of our neighborhoods and on businesses and schools in the neighborhoods.
 - According to WSDOT consultant Larry Kyle, the construction plan for the bridge replacements is to build **half lids** to serve traffic as temporary bridges north of the present East Roanoke Street Bridge and east of the present 10th Avenue East Bridge over SR 520. (The closure of Delmar Drive East, as we understand it, means that a temporary bridge [half lid] will not be constructed adjacent to the present Delmar Drive East bridge over SR 520 at Delmar Drive East.)
 - **Finishing and landscaping the lids over I-5 and SR 520 immediately after the replacement bridges have been constructed and put into operation** would spare historic resources from many of the further adverse effects of the preferred option's six- or seven-lane Portage Bay Bridge project's six-year construction phase and the highway widening phase and would provide **an opportunity for monitoring and fine-tuning** to perfect measures to avoid, minimize, and mitigate subsequent operation effects on historic resources.
 - Deferring lid construction, as is predicted in the SDEIS's indication that the Phased Implementation Scenario is the most likely construction scenario, would lead to major adverse construction effects on historic resources that could be avoided or minimized. The most vulnerable parts of the project, most in need of replacement, should of course be taken care of first. But lids could go a long way toward easing construction effects. **Note that both the I-5 and the 10th and Delmar lids are designed and option neutral. Their early installation would be an expression of good faith on WSDOT's part, an expression badly needed at this stage of WSDOT's relations with the communities and institutions adjacent to the project.**
- **Adverse effects to both buildings and vegetation from demolition and construction effects** of all three arterial bridge projects and the two lid projects should be anticipated, and ways of avoiding or minimizing, the effects of this extremely dusty, clogging, eroding and soiling, noisy, and earth-shaking demolition and construction activity should be discussed in a Memorandum of Agreement.
- WSDOT should stay in touch with the residents. WSDOT should furnish **current contact phone numbers and an e-mail address** so that residents can keep WSDOT apprised of effects, and WSDOT should make speedy response to resident notifications. **Developing a website and reporting periodic monitoring results would be a good idea as well.**
- Every precaution should be taken to ensure that historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood are not affected during construction by vibration, excavation, or heavy equipment. **Monitor vibration levels** for all demolition and construction activity.
 - **Monitor noise periodically at bedroom height** and ensure compliance with local noise regulations for construction and equipment operation. "Periodically" could mean regularly and whenever a new kind of construction activity starts up and during that activity.
 - **Monitor air quality periodically from the construction footprint to 300 meters from any construction activity.** (300 meters is the distance the *Health Impact Assessment* says highway pollution would reach.) "Periodically" could mean both regularly and whenever a new kind of construction activity starts up and during that activity.
 - **Install fencing and landscaping or landscaped buffers in the Roanoke Parklands South East and West and other areas** where historic resources would be exposed to construction and

and from its contributing resources, have been revised in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS), where appropriate.

C-008-132

Throughout construction, best management practices (BMPs) will be used to minimize impacts from construction activities. BMPs will minimize loss of vegetative buffers, reduce fugitive dust, manage truck traffic, reduce nighttime glare, and reduce other construction impacts as much as possible.

Although the setting and feeling of the contributing properties in the district may be altered by construction activities, none of the effects would be permanent.

As noted in the Historic Property Inventory Form for the Roanoke Park Historic District, this district was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion A and Criterion C. The district was determined eligible under Criterion A because of its association with events that have made significant contributions to the broad patterns of our history. Under Criterion C, the district has been shown to embody the distinctive characteristics of a type, period, or method of construction and to represent the work of a master.

This project will not alter the Roanoke Park Historic District's association with events that have made significant contributions to the broad patterns of our history. Additionally, this project will not affect the architectural character of the district and contributing properties or their representations of the work of a master.

The characteristics that qualified the district for the NRHP will not be diminished by construction. Indirect effects from construction will be

operation effects of the project to offset the removal or reduction of vegetation in buffer zones and where new or relocated traffic lanes intrude on the character of the historic district or the settings of individual historic properties.

- **Install historically faithful double-paned windows** in houses likely to be affected by seven and a half to eight years of increased construction noise.
- **Wash windows** of affected historic buildings periodically.
- **Protect exteriors of affected historic buildings** from an accumulation of excessive dirt and dust during demolition, staging, hauling, and construction, and clean them in an appropriate manner periodically during construction and at the conclusion of construction. WSDOT is to consult with the SHPO and/or the Seattle Historic Preservation Officer before implementing any protection or cleaning methods.
- **Protect mature trees** from vibration and an accumulation of excessive dirt and dust during demolition, staging, hauling, and construction. Wash them periodically.
- Locate any construction sheds, barricades, or material storage away from historic properties, and **avoid obscuring views of and views from historic properties.**
- **Provide construction access directly to and from the construction zone along arterials** to eliminate construction truck traffic and detours along residential streets in the Roanoke Park Historic District and the Portage Bay neighborhood.
- Make every effort to keep the historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood accessible and functional during and after construction. **Residents should have priority in reaching their homes and accustomed parking places.**

Operation

- Depending on the option, **noise walls and/or quieter pavement** have been incorporated into the design of the project to reduce noise along the proposed roadway. The choice of noise reduction method along the segments of the project should be made in light of both effectiveness and potential visual effects. **The use of more than one method should be considered.** Minimization of noise at expansion joints should be a priority. **Measure and compare the respective noise reducing methods at bedroom height in both the Roanoke Park Historic District and the Portage Bay neighborhood.** WSDOT should consult with the Arizona Department of Transportation, which has experienced great success with quieter pavement over many years with studded tires, chains, and freezing and thawing in the Flagstaff area, on proper installation and maintenance of quieter pavement.
- New lids have been designed to cover I-5 at the East Roanoke Street crossing and to cover SR 520 at 10th Avenue East and Delmar Drive East. **These lids are to be landscaped and have pedestrian crossings, providing a new green space in each area and reuniting the communities on either side.** The landscaped lids will also help to minimize the visual and audible effects of I-5 and SR 520. (See the discussion of early lid construction and landscaping as mitigation in the "Construction" section above.)
- **New bicycle/pedestrian paths are to be built along the I-5 and 10th and Delmar lids** to reconnect the Roanoke Park and North Capitol Hill neighborhoods, the Roanoke Park and Eastlake neighborhoods, and the Roanoke Park and Portage Bay neighborhoods, particularly with respect to the many schools in these neighborhoods, and to enhance pedestrian access, which was made unpleasant when I-5 and SR 520 were built in the 1960s.

avoided, minimize or mitigated through the use of best management practices and agreed-upon measures outlined in the Community Construction Management Plan (Attachment 9 to the Final EIS), included by reference in the Programmatic Agreement (Attachment 9 to the Final EIS).

C-008-133

Please see the response to comments C-008-118 and C-008-130, which state that construction impacts would be avoided, minimized and mitigated through the use of best management practices and agreed-upon conditions outlined in the Community Construction Management Plan (Attachment 9 to the Final EIS).

C-008-134

In response to community and agency input and comment, the Preferred Alternative includes lids and enhanced crossings in these locations:

1. I-5 and East Roanoke Street (enhanced pedestrian crossing)
2. 10th Avenue East and Delmar Drive East
3. Montlake Boulevard and 24th Avenue East

These lids have been designed to reconnect communities and landscapes by creating open space, restoring or creating views, and enhancing bicycle and pedestrian movement. The lid at 10th Avenue East and Delmar Drive East will directly benefit the Roanoke Park Historic District by enhancing the setting and feeling of the district and reducing the operational effects from SR 520. This lid is expected to be completed within a two-year timeframe.

Also, please see the response to comment C-008-024, which states that NEPA avoids speculative conclusions.

C-008-217

- **Every measure should be taken to ensure that historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood are not affected by visual blight, vibration, noise, air pollution, and nighttime glare in operation of the new arterial bridges, the widened highway, the SR 520 bridges (including the Portage Bay Bridge, the West Approach, and the floating bridge), and ramps.**
- **As mitigation, WSDOT should work with the Roanoke Park Historic District to engage designers or sponsor a competition to provide historic markers for the Roanoke Park Historic District at East Shelby Street on Harvard Avenue East and on three gateways to the Roanoke Park Historic District: East Roanoke Street at Harvard Avenue East, the main gateway at 10th Avenue East at its intersection with East Roanoke Street, and Delmar Drive East at its intersection with East Roanoke Street. Historic lighting fixtures would be a part of this design project.**
- **In addition, WSDOT has been working with the Roanoke Park Historic District to come up with a treatment of the streets that run along the Roanoke Park Historic District on its south and west sides that is sympathetic with the residential, tree-lined setting of the Roanoke Park Historic District, urban intersections, and in the interests of traffic calming.** Rob Berman, the SR 520 Program Planning Manager, asked us for a plan, which we have furnished. The plan has met with WSDOT's approval and has been passed to SDOT for their evaluation. When approval has been granted, this intention should be recorded in the Memorandum of Agreement.
- **The introduction of traffic calming devices on the arterials to keep traffic moving at a slow and steady speed, less polluting than idling or high speeds,** would contribute to a lessening of the air pollution that threatens the structural integrity of materials in the built historic environment and that would harm the mature shade trees that so contribute to the atmosphere and feeling of the district's setting.
- **The undergrounding of wires on the bridges and along the arterials** would permit the planting of tree canopy so characteristic of the setting of the historic district the streets run beside and help to reduce the accurate perception that air pollution from two more lanes of gas-powered vehicles had worsened air quality in our neighborhoods.
- **The use of quiet pavement on SR-520 as it runs along the West Approach, the Portage Bay Bridge, and the highway to I-5, on ramps, and on Harvard Avenue East, East Roanoke Street, 10th Avenue East, Delmar Drive East, and Fuhrman-Boyer Avenue East** would further contribute to the quiet atmosphere and feeling for which the Roanoke Park Historic District and the Portage Bay neighborhood are noted.
- **Having undergrounded overhead wires and constructed substantial lid columns, plant large shade trees to create a canopy over the streets that run alongside the Roanoke Park Historic District on the west and the south, along the three arterial replacement bridges, along the edges of the lids and on lid columns, and along Fuhrman-Boyer Avenue East.**

All of these measures to avoid, minimize, and mitigate the construction and operation of the SR 520 Bridge Replacement and HOV project should be recorded and committed to in a Memorandum of Agreement between WSDOT and the Portage Bay/Roanoke Park Community Council to protect and enhance the historic resources in the Roanoke Park Historic District and the historic resources in the Portage Bay neighborhood.

Sincerely,

Erin O'Connor
Historic Resources Chair, Portage Bay/Roanoke Park Community Council
Roanoke Neighborhood Elms Fund
Friends of Roanoke Park

C-008-135

Please see the response to Comment C-008-024, which states that NEPA avoids speculative conclusions.

C-008-136

Please see the response to Comments C-008-120 and C-008-122, which state that construction impacts would be avoided, minimized and mitigated through the use of best management practices and agreed-upon conditions outlined in the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS).

C-008-137

Please see the response to Comment C-008-118 and C-008-130, which state that construction impacts would be avoided, minimized and mitigated through the use of best management practices and agreed-upon conditions outlined in the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS).

C-008-138

Please see the response to Comment C-008-134, which states that an enhanced bicycle and pedestrian path and two lids are included as part of the Preferred Alternative.

C-008-139

Please see the response to Comment C-008-024, which states that NEPA avoids speculative conclusions.

C-008-140

Please see the response to Comments C-008-120 and C-008-122, which state that WSDOT has drafted a construction timeline for the enhanced bicycle and pedestrian path, as well as the 10th Avenue East and Delmar Drive East lid.

From: Erin O'Connor [mailto:erinoc28@comcast.net]
Sent: Wednesday, April 14, 2010 1:39 PM
To: Young, Jenifer (Consultant); SR 520 Bridge SDEIS; Brooks, Allyson
Cc: 'Houser, Michael (DAHP)'; Karen.Gordon@seattle.gov;
chris.gregoire@gov.wa.gov; Turner, Joyce; Arnold-Williams, Robin; Brown, Marty; edward.murray@leg.wa.gov; frank.chopp@leg.wa.gov;
jamie.pedersen@leg.wa.gov; mike.mcgin@seattle.gov; 'Richard Conlin';
mike.obrien@seattle.gov; tom.rasmussen@seattle.gov;
jean.godden@seattle.gov; tim.burgess@seattle.gov; Nick.Licata@Seattle.Gov;
warneda@consultant.wsdot
Subject: Addendum on Mitigation for Adverse Effects of 520 project on Historic Resources in Roanoke Park Historic District and Portage Bay Neighborhood

Dear Ms. Young:

As promised at the end of our March 2009 formal comments on the *SDEIS December 2009 Cultural Resources Discipline Report* (below and attached), we are sending you an addendum (attached) on proposed mitigation measures (meant to be understood as avoidance, minimization, and mitigation measures) of the adverse direct, indirect, and cumulative effects of the SR 520 Bridge Replacement and HOV Project construction and operation on historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood. We trust that these proposed mitigation measures will be included in a Memorandum of Agreement between WSDOT and the Portage Bay/Roanoke Park Community Council.

Sincerely,

Erin O'Connor
Historic Resources Chair, Portage Bay/Roanoke Park Community Council
Roanoke Neighborhood Elms Fund
Friends of Roanoke Park

C-008-141

The enhanced bicycle and pedestrian path, along with the two lids, are major project elements of the Preferred Alternative. They are not considered mitigation, but are design elements that support motorized and non-motorized traffic flow, while connecting communities adjacent to SR 520. The enhanced bicycle and pedestrian path will be completed with completion of the portion of the project in which it is located. Mitigation measures to reduce construction impacts will be outlined in the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS), a plan that the Section 106 consulting parties are helping to develop. Mitigation measures used to resolve the project's adverse effect are provided in the Programmatic Agreement (Attachment 9 to the Final EIS), to which the Section 106 consulting parties have concurred.

C-008-142

The requested change was not made because in the areas near the I-5 and SR 520 interchange and between I-5 and the Portage Bay Bridge, the project would be the same under each option. Therefore, the effects were only discussed once.

C-008-143

The requested change was not made because the high-occupancy vehicle ramp adjacent to the existing on-ramp would only result in a slight change in visual quality. The visual effect would not be a significant change from the existing viewshed of the historic properties and would not diminish the integrity of the adjacent historic properties. See the Final Cultural Resources Assessment and Discipline Report for a visual simulation of the new HOV ramp.

Additionally, the project's effect on historic properties has been fully evaluated through the Section 106 process. In consultation with Section 106 consulting parties, a Programmatic Agreement (Attachment 9 to the

Final EIS) has been developed to record the terms and conditions agreed upon to resolve project's adverse effect. To minimize effects, the Programmatic Agreement includes a stipulation that WSDOT will consult with appropriate concurring parties during the design process for the I-5 interchange about the aesthetic treatment of the flyover HOV ramp and potential measures for protecting views of and from historic properties.

C-008-144

Please see the response to Comment C-008-134, which states that an enhanced bicycle and pedestrian path and two lids are included as part of the Preferred Alternative.

C-008-145

Please see the response to Comment C-008-024, which states that NEPA avoids speculative conclusions.

C-008-146

WSDOT has reviewed each of the following comments and has responded accordingly.

The potential effect from operation of the project on historic properties located within the Area of Potential Effects (APE) was analyzed in the Final Cultural Resources Assessment and Discipline Report. The APE has been revised a number of times in response to community and agency input and changes in project design. Historic resources outside the APE were not surveyed and are not discussed in the Final Cultural Resources Assessment and Discipline Report (Attachment 9 to the Final EIS).

The viewshed for historic properties within the APE was considered in WSDOT's analysis of the setting and feeling. Information from the Visual Quality Discipline Report and Addendum was used in this analysis. The

Visual Quality Discipline Report and Addendum include a more comprehensive analysis of the viewshed that includes properties outside of the APE.

WSDOT surveyed all properties along the potential haul route including along Furhman and Boyer Avenues.

C-008-147

The 2005 Visual Quality and Aesthetics Discipline Report was one step in determining the visual effect on historic properties. The 2005 discipline report remains part of the public and administrative record for the project. The analyses in the 2005 Visual Quality and Aesthetics Discipline Report and the 2010 Visual Quality and Aesthetics Discipline Report were conducted using the same methodology; however, because they analyzed different design options, they have different findings about the effects on the surrounding environment. The Visual Quality and Aesthetics Discipline Report Addendum (Attachment 7 to the Final EIS) also has a slightly different finding because it analyzed the Preferred Alternative.

The information in the Visual Quality and Aesthetics Discipline Report is not dependent on the information from the Cultural Resources Discipline Report and is not influenced by cultural resources determinations. The visual quality discipline reports use different criteria than those used in the cultural resources discipline reports. The Visual Quality and Aesthetics Discipline Report includes the most current and accurate information for its discipline.

C-008-148

One of the first steps in the SR 520 Program was the formation of the Design Advisory Group (DAG), whose purpose was to explore and articulate an aesthetic vision for the new SR 520 facilities. The DAG was an important step in the ongoing community information and outreach

process that began with the Trans-Lake Washington Study and will continue through design and construction.

WSDOT has a strong commitment to developing projects in accordance with the Context-Sensitive Design/Solutions (CSD/CSS) philosophy. The SR 520 Program's CSD/CSS process is both collaborative and interdisciplinary and places great emphasis on understanding the relationship between land use form and function and transportation design, as well as engaging and involving community stakeholders in the design process.

The final design of the Portage Bay Bridge will be context sensitive to increase compatibility with existing landscape features and to avoid breaking up the vividness, intactness, and unity of the area. The width of the bridge has been further reduced compared to the options presented in the SDEIS, and the increase in height would only occur on the bridge's eastern half. Noise walls are not recommended for the Portage Bay Bridge with the Preferred Alternative because the associated noise reduction would not satisfy WSDOT feasibility criteria.

Although the new Portage Bay Bridge will be the project's greatest change to visual quality, the completed bridge will include aesthetic treatments such as haunches and false arches. The visual change that results from the new Portage Bay Bridge would not diminish the integrity of the Roanoke Park Historic District.

C-008-149

Please see the response to Comment C-008-011, which states that although the setting and feeling of the Roanoke Park Historic District would be altered by construction activities in Portage Bay, none of the impacts would be permanent.

C-008-150

The Visual Quality and Aesthetics Discipline Report Addendum (Attachment 7 to the Final EIS) states that the overall character and quality of the Portage Bay landscape unit would be different as a result of the new Portage Bay Bridge, but visual quality would not change significantly because the bridge is already the dominant structure in the views in this area. The context-sensitive design of the new bridge would allow the vividness and unity of views in the area to remain high and could even increase intactness.

C-008-151

To ensure that visual effects do not become diminish the integrity of historic properties, the design of the new Portage Bay Bridge will be context sensitive. The addition of aesthetic treatments such as haunches and false arches and the absence of noise walls will help to reduce visual interruption.

C-008-152

Noise walls are not recommended for the new Portage Bay Bridge under the Preferred Alternative because the associated noise reduction would not satisfy WSDOT feasibility criteria. The noise analysis of the Preferred Alternative for the Final EIS demonstrates that noise in the Portage Bay area would achieve adequate reduction from the 10th Avenue East and Delmar Drive East lid, the use of noise-absorptive traffic barriers, and from the reduced speed limit on the Portage Bay Bridge.

Aesthetic treatments will also be applied to the new Portage Bay Bridge to enhance the visual experience and appeal of the bridge.

C-008-153

The Roanoke Park Historic District could experience a change in visual

quality from vegetation removal in the surrounding areas. To minimize the change in visual quality, WSDOT would protect and retain mature vegetation as much as is reasonable and feasible. Although some existing vegetated buffer areas might be reduced, adding the lid at 10th Avenue East and Delmar Drive East would provide a new type of buffer from the roadway that would be more extensive than the existing vegetative buffer.

C-008-154

Although the new Portage Bay Bridge would have a moderate to high visual effect on the landscape unit, the context-sensitive design would ensure that the visual effect would not diminish the integrity of surrounding historic properties.

The proximity of Option A and the Preferred Alternative to the Bagley Viewpoint has not been discussed because these designs incorporate the Bagley Viewpoint into a larger lidded design. Although the Roanoke Park Historic District would experience a visual change to setting from the replacement bridge, there will be a beneficial change to setting and feeling, and visual improvement, from the new 10th Avenue/Delmar Drive lid.

C-008-155

Please see the response to Comment C-008-152, which states that noise walls are not recommended for the new Portage Bay Bridge under the Preferred Alternative.

C-008-156

Please see the response to Comment C-008-097, which states that the toll would generate revenue for the SR 520 corridor, subject to legislative appropriation.

C-008-157

The requested change was not made because the design of the Portage Bay Bridge under Option A included six lanes and an auxiliary lane.

C-008-158

This has been addressed on page 173 of the Cultural Resources Discipline Report, which stated, “The new Portage Bay Bridge would have a visual effect on the houses on the east side of 10th Avenue East between East Roanoke Street at the south and just north of East Shelby Street at the north. Those houses currently have views of the existing Portage Bay Bridge, and the new bridge would be approximately 12 feet taller. This would have a visual effect on the setting and feeling of the Roanoke Park Historic District and those contributing elements that view the bridge.”

The Cultural Resources Discipline Report also stated that the Roanoke Park Historic District would experience a change to setting from the replacement of the Portage Bay Bridge, but that a beneficial change to setting and feeling would be experienced because of the visual improvement from the landscaped lid.

C-008-159

The Cultural Resources Discipline Report did not say that the Andrew Gunby House will be shielded from noise by the lid at 10th Avenue East and Delmar Drive East, as indicated in this comment. However, it did state that, “The lid would be beneficial to the Roanoke Park Historic District, Fire Station 22, the Boyd House, and the *Andrew Gunby House*, because it would provide a pedestrian passageway between the North Capitol Hill and Roanoke Park/Portage Bay neighborhoods currently separated by SR 520, increased landscaped green space in the area, and *some reduced noise levels*” (pg 172 [emphasis added]).

The Final Cultural Resources Assessment and Discipline Report

(Attachment 7 to the Final EIS) goes further, stating that the lid would visually shield many of the historic properties (including the Gunby house) from the visual effect of the wider SR 520 roadway.

C-008-160

Quieter concrete pavement was not included in the models used to calculate noise levels for the SDEIS or Final EIS because future pavement surface conditions cannot be determined with certainty. Quieter concrete pavement is included as a design feature for Option A, Option K, and the Preferred Alternative.

C-008-161

Per WSDOT Traffic Noise Analysis and Abatement Policy and Procedures (found online at <http://www.wsdot.wa.gov/NR/rdonlyres/26528ACC-7437-427C-BE81-F6FFA9C3BFD2/0/WSDOTNoisePolicy.pdf>), all outdoor human use areas are included in a traffic noise analysis. The sites selected are in the yard of the property, typically facing the project roadway, at an elevation of 5 feet off the ground. For multifamily units, apartments and condominiums, this modeling site can be on the deck of the unit if that is the primary exterior use at that residence. WSDOT does not predict noise levels at the second floors of single-family residences, unless there is a deck and that deck is the primary outdoor use at the residence. Indoor locations may be used where outdoor use areas do not exist. For a project with a large number of residences, it is not necessary to have traffic sound level predictions at every residence. However, sufficient sound level predictions must be made to accurately represent the sound level conditions that are most likely to occur. Sound level predictions are derived from the FHWA Traffic Noise Model, not from field-measured noise levels. The model includes a breakdown of passenger vehicles, delivery trucks, heavy trucks, and buses, and uses peak-hour traffic volumes traveling at posted speed limits in the model. Given these

inputs, the analysis presented in this EIS is a conservative estimate of what would be experienced outdoors at each of the modeling locations.

C-008-162

The Preferred Alternative design is the only design discussed in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS). With the Preferred Alternative, the new Portage Bay Bridge is narrower than the design in Option A, and noise walls are not recommended.

C-008-163

The number of homes with views of the Portage Bay Bridge has been updated in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS). The new Portage Bay Bridge would have a visual effect on portions of the Roanoke Park Historic District and would be most pronounced for houses on the east side of 10th Avenue East between East Roanoke Street on the south and just north of East Shelby Street on the north.

C-008-164

When conducting an the analysis for change in visual quality, WSDOT did not compare future views to those that existed before the construction of the current SR 520 and Portage Bay Bridge. Instead, WSDOT compared the future views with the present-day views, both of which contain a bridge at the southern end of Portage Bay as the dominant structure in this viewshed. WSDOT has determined that the new Portage Bay bridge may alter the setting and feeling of the district, but that the visual change would not be considered to be a cumulative effect of the project.

C-008-165

Please see the response to Comment C-008-092, which states that

additional information pertaining to the Roanoke Park Historic District can be found in the NRHP nomination form in Attachment 4 of the Cultural Resources Discipline Report.

A portion of the Portage Bay/Roanoke Park neighborhood between I-5 and Portage Bay is a Historic District and is included within the project's APE. Its boundary is shown on Exhibit 4.6-1 in the Final EIS. Other portions of the neighborhood which are not within the Historic District but within the APE were also surveyed and are shown on Exhibit 4.6-1.

The Cultural Resources Discipline Report, pages 174 through 189, includes a separate discussion of operation effects for all three SDEIS options. These discussions indicate that the potential effects from Options A, K, and L to the Roanoke Park Historic District would be generally the same. The Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) provides a discussion of operation effects for the Roanoke Park Historic District and the Individually Eligible Historic Properties in the Portage Bay/Roanoke Park Area (Outside of the Roanoke Park Historic District).

C-008-166

Please see the response to comment C-008-163, which states that the number of homes with views of the Portage Bay Bridge has been updated in the Final Cultural Resources Assessment and Discipline Report.

C-008-167

The potential effects to the Roanoke Park Historic District were generally the same for the three SDEIS options. An updated list analysis of the potential effect on the Roanoke Park Historic District from the Preferred Alternative has been added to the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

See the responses to Comments C-008-003, -010, -121, and -141. The Preferred Alternative does not include a lid over I-5 (see Chapter 2 of the Final EIS). Instead, the proposed I-5 lid will be replaced with an enhanced bicycle and pedestrian crossing. The lids are a major project element, and will be built at the same time as the corresponding portion of the corridor.

C-008-168

The Portage Bay Bridge design from Option A was the widest of the three options evaluated in the SDEIS. The Portage Bay Bridge design in the Preferred Alternative is narrower than in Option A, but will be approximately 42 to 56 feet wider than the existing bridge. See Table 2-6 in the Final EIS for additional information.

C-008-169

Please see the response to Comment C-008-163, which states that the number of homes with views of the Portage Bay Bridge has been updated in the Final Cultural Resources Assessment and Discipline Report.

C-008-170

WSDOT has determined that there will be a visual change to the setting of the Roanoke Park Historic District from the replacement Portage Bay Bridge. However, this visual change will not diminish the integrity of adjacent historic resources because the existing Portage Bay Bridge dominates the existing viewshed.

Relevant analyses have been updated in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-171

WSDOT has acknowledged that the new bascule bridge may diminish the integrity of the historic Montlake Bridge. Construction of the new

bascule bridge parallel to the Montlake Bridge will create a change in visual quality for properties on the north side of the Montlake Historic District. Also, the view of the historic bridge would be impeded during construction, but this would be temporary. However, the new bascule bridge would not obscure the view of the original and the context-sensitive design would help to minimize the visual impact of the new bridge. The Programmatic Agreement (Attachment 7 to the Final EIS) stipulates that the new bridge design would be context sensitive.

C-008-172

Although the new bascule bridge could alter the setting and feeling of some contributing properties in the Roanoke Park Historic District, the change would not diminish any of the defining characteristics because of the distance of the historic bridge from the district. The new bascule bridge would be visible primarily from the rear of houses on 10th Avenue East between East Hamlin and East Shelby streets. The new bascule bridge would not obscure the view of the original Montlake Bridge from these houses because it would be built on the eastern side of the historic Montlake Bridge

C-008-173

This sentence pertaining to the width of Portage Bay has been removed and is not included in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-174

A list of the potential impacts from operation of the Preferred Alternative on the Roanoke Park Historic District has been added to the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-175

To ensure that a temporary change in setting and feeling does not result in a diminishment of integrity, WSDOT has committed to implementing a number of avoidance and minimization measures, which have been stipulated in the Programmatic Agreement (Attachment 9 to the Final EIS). Additional mitigation and minimization measure will be included in the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS), which is also being developed in coordination with Section 106 consulting parties.

C-008-176

The Final Cultural Resources Assessment and Discipline Report stated that there will be a visual change to the setting of the Roanoke Park Historic District from the replacement of the Portage Bay Bridge. The visual change would be minimized through a context-sensitive design and the absence of noise walls.

The requested edit pertaining to Options K and L was not made because the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) focuses on an analysis of the Preferred Alternative.

C-008-177

The Preferred Alternative would cause some indirect visual effects on the Roanoke Park Historic District that would alter the setting and feeling of the district. Measures to avoid and minimize these visual effects on the Roanoke Park Historic District were refined through consultation with the Section 106 consulting parties, and the agreed-to conditions were incorporated as stipulations in the Programmatic Agreement (Attachment 9 to the Final EIS).

C-008-178

Although the Preferred Alternative would cause some indirect visual and potential noise effects on the Roanoke Park Historic District that would alter the setting and feeling of the district, these effects would not diminish the overall levels of integrity of association, location, design, materials, and workmanship of the district. Also, WSDOT analyses have shown that local air quality would improve compared to the No Build Alternative. Stipulations in the Programmatic Agreement and the Community Construction Management Plan (both in Attachment 9 to the Final EIS) will resolve the effects that could temporarily alter the integrity of the historic district.

C-008-179

The Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) does not discuss SDEIS Options A, K, and L; instead, it addresses the Preferred Alternative that was developed after the SDEIS was published. Analysis of the Preferred Alternative has found that the new Portage Bay Bridge would have a visual effect on portions of the Roanoke Park Historic District and would alter the setting and feeling of the historic district. These changes would be minimized through a context-sensitive design for the bridge. Noise walls are not recommended for the Portage Bay Bridge with the Preferred Alternative, and noise conditions are expected to improve over the No Build Alternative. Please see the Noise Discipline Report Addendum (Attachment 7 to the Final EIS) for more information related to noise. WSDOT analyses have also shown that local air quality would improve over the No Build Alternative. Nighttime glare and vibration are not expected to alter the setting and feeling of the historic district. Please see the Air Quality Discipline Report Addendum and the Geology and Soils Discipline Report Addendum (Attachment 7 to the Final EIS) for more detailed information.

C-008-180

The noise modeling of the Preferred Alternative for the Final EIS demonstrated that noise in the Portage Bay area would achieve adequate reduction from the 10th Avenue East and Delmar Drive East lid, the use of noise-absorptive traffic barriers, and the reduced speed limit on the Portage Bay Bridge. Noise walls are not recommended for the Portage Bay Bridge under the Preferred Alternative because the associated noise reduction would not satisfy WSDOT feasibility criteria.

C-008-181

Analysis of the Preferred Alternative has found that the new Portage Bay Bridge would have a visual effect on adjacent historic properties and could alter setting and feeling as well. These indirect effects would be minimized through a context-sensitive design for the bridge as stipulated in the Programmatic Agreement (Attachment 9 to the Final EIS).

The noise modeling of the Preferred Alternative for the Final EIS demonstrated that overall noise in the Portage Bay area would decrease compared to the No Build Alternative. Adequate noise reduction would result from the noise-reducing effects of the 10th Avenue East/Delmar Drive East lid, noise-absorptive traffic barriers, and the lower speed limit across the Portage Bay Bridge. Noise walls are not recommended for the Portage Bay Bridge with the Preferred Alternative, and noise conditions are expected to improve over the No Build Alternative.

WSDOT analyses have shown that with the Preferred Alternative, local air quality would improve over the No Build Alternative. Nighttime glare and vibration are also not expected to impact the historic resources in the Portage Bay neighborhood. Please see the Air Quality Discipline Report Addendum and the Geology and Soils Addendum (Attachment 7 to the Final EIS) for more detailed information.

C-008-182

The visual change to the Roanoke Park Historic District caused by replacement of the Portage Bay Bridge will be minimized through the implementation of the specific stipulations set forth in the Programmatic Agreement (Attachment 9 to the Final EIS). These stipulations were refined through consultation with the affected parties and included community involvement in context-sensitive design for the new Portage Bay Bridge. Adjacent homeowners and properties beyond the APE boundaries will also benefit from this mitigation.

C-008-183

Currently, the width of the Portage Bay bridge ranges from 63 to 102 feet. Under Option A, from the SDEIS, the proposed width of the Portage Bay bridge would have ranged from 110 to 165 feet. The width of the new Portage Bay Bridge, with the Preferred Alternative, is 105 to 158 feet.

Thus the width of the Portage Bay bridge will increase by 42 to 56 feet through the design of the Preferred Alternative. See Table 2-6 in the Final EIS for additional information.

C-008-184

Noise walls are not recommended for the new Portage Bay Bridge under the Preferred Alternative because the associated noise reduction would not satisfy WSDOT feasibility requirements. The new bridge would be less than 15 feet higher than the existing structure, and the height increase would only occur on the eastern half of the bridge. WSDOT analyses have shown that with the project, local air quality would improve over the No Build Alternative. Because of the forecasted improvement of local air quality, erosion and soiling of historic resources is not expected from operation of the new Portage Bay Bridge.

Although the Portage Bay Bridge would cause a visual change to the

Roanoke Park Historic District, this would be minimized through the implementation of the terms and conditions in the Programmatic Agreement (Attachment 9 to the Final EIS).

C-008-185

The Roanoke Park Historic District and its contributing elements were not discussed in the operations effects findings section for Option A because WSDOT determined operation of Option A would not alter or diminish the integrity of the Roanoke Park Historic District. Upon further analysis and consultation, the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) has been updated to reflect the potential for a visual change from operation of the Portage Bay Bridge. The final report includes a detailed discussion of the potential impacts from project operation on the Roanoke Park Historic District. This change would be minimized through the implementation of the terms and conditions of the Programmatic Agreement (Attachment 9 to the Final EIS) including the use of a context-sensitive design.

C-008-186

As stated in the Cultural Resources Discipline Report, the design of the new bascule bridge will be context sensitive to minimize its impact on the setting and view of the historic Carl F. Gould Montlake Bridge. Stipulations of the Programmatic Agreement (Attachment 9 to the Final EIS) would resolve the effects that could temporarily or permanently alter or diminish the integrity of the historic bridge.

C-008-187

Additional analysis of the project effect on historic properties was conducted for the Preferred Alternative. WSDOT reviewed the potential for the Preferred Alternative to temporarily or permanently alter or diminish the integrity of the Roanoke Park Historic District. Although the Preferred Alternative would cause some indirect visual and potential

noise effects on the Roanoke Park Historic District that would affect the setting and feeling of the district, these effects would not diminish the overall levels of integrity of association, locations, design, materials, and workmanship of the district. None of the potential effects from the project would diminish the integrity of the Roanoke Park Historic District, conditional upon implementation of the Programmatic Agreement (Attachment 9 to the Final EIS).

WSDOT has determined that there would be indirect effects on the Roanoke Park Historic District that would result in changes to the setting and feeling of the district. However, the integrity of design, materials, workmanship, association, and location of the district would be retained.

C-008-188

For this project, the APE consists of three footprints:

1. The known or anticipated construction footprint that includes staging and laydown areas
2. A buffer area (one property deep or 200 to 300 feet from the construction footprint, as appropriate) that includes sufficient area to encompass historic structures, commercial buildings and residences, historic districts, and public facilities (including parks and bridges) that might be directly or indirectly affected by demolition, change of land use, noise, dust, vibration, degraded visual quality, or other effects
3. Additional areas outside the construction footprint, determined through consultation, such as the entire Roanoke Park Historic District, the entire Washington Park Arboretum, and all the navigable waters of Portage Bay

In May 2010, the APE was amended to include areas along potential haul routes.

The Houseboat community is not included in the APE because they are not located along haul routes, and are not in an area where they would be affected by the project. As part of the Programmatic Agreement, however, WSDOT will assist the community in their future historic planning efforts by recording the houseboats currently docked on the west shore of Portage Bay between University Bridge and the Queen City Yacht Club docks.

Individually eligible historic properties in the Portage Bay neighborhood may experience a change to setting and feeling from the construction and operation of the new SR 520. However, because stipulations in the Programmatic Agreement that was developed in coordination with the Section 106 consulting parties would be implemented, the integrity of these properties will not be diminished. Many homes adjacent to the SR 520 corridor will certainly benefit from a number of the terms and conditions set forth in the Programmatic Agreement. Although the minimization and mitigation measures in the Programmatic Agreement were designed in conjunction with the Section 106 parties, with the intention to avoid, minimize, and mitigate the adverse effect on historic properties, many adjacent properties will also benefit from this agreement.

C-008-189

For Options A, K and L, the areas near the I-5 and SR 520 interchange and between I-5 and the Portage Bay Bridge were the same and would have had similar effects on historic properties.

Please see the response to comment C-008-179, which states that the Final Cultural Resources Assessment and Discipline Report does not discuss SDEIS Options A, K, and L; instead, it addresses the Preferred Alternative that was developed after the SDEIS was published.

C-008-190

With the Preferred Alternative, noise modeling shows that noise walls would not be recommended in the Seattle portion of the project, except potentially along I-5 in the North Capitol Hill area where the reasonableness and feasibility of a noise wall is still be evaluated. With the Preferred Alternative, noise walls are not recommended for the Portage Bay Bridge, specifically, because the associated noise reduction would not satisfy WSDOT feasibility criteria. See Section 5.7 of the Final EIS for additional detail.

The impact of the new Portage Bay Bridge on adjacent views would be minimized through a context-sensitive design. The design process for the Portage Bay Bridge has also incorporated community input, part of the effort to produce a mutually agreeable final design.

Although quieter concrete pavement was considered in Options A and K, it was not included in WSDOT noise models because future pavement surface conditions cannot be determined with certainty.

C-008-191

Please see the response to Comment C-008-181 regarding effects of the Portage Bay Bridge. Noise walls are not recommended for the Portage Bay Bridge under the Preferred Alternative, and noise conditions are expected to improve over the No Build Alternative. WSDOT analyses have shown that with the Preferred Alternative, local air quality would improve over the No Build Alternative. Nighttime glare and vibration are also not expected to impact the historic resources in the Portage Bay neighborhood.

Also see the response to Comment C-008-021 regarding landscape buffers. As stipulated in the Programmatic Agreement, "WSDOT will install landscaping or landscaped buffers where practicable in areas where buffer zones are being removed or reduced, and where new or

relocated traffic lanes would intrude on the character of a historic district or the settings of individual historic properties.”

C-008-192

Noise modeling for both the SDEIS and Final EIS was performed for the typical outdoor uses at noise sensitive properties along the corridor, as required by the FHWA and WSDOT. No noise modeling is performed at upper floors except for multi-family residences where a deck is the main outdoor use. The analysis uses projected year 2030 traffic volumes and vehicle mixture (cars, medium and heavy trucks, and buses) at the proposed speed limits, and included the effects of the lids and 4-foot concrete traffic barriers with noise-absorptive coating. WSDOT's noise analysis and abatement efforts are in compliance with the National Environmental Policy Act of 1969, the Federal-Aid Highway Act of 1970, the Noise Control Act of 1972, and follows the Code of Federal Regulations (CFR) 772. Noise modeling was conducted for each SDEIS design option without noise walls, and noise walls were evaluated for all design options based on FHWA and WSDOT's noise mitigation policies.

The noise analysis of the Preferred Alternative for the Final EIS includes noise reduction strategies such as 4-foot concrete traffic barriers with noise-absorptive coating, noise absorptive materials around lid portals, and a reduced speed limit on the Portable Bay Bridge. An analysis of noise walls is also included where warranted. The FHWA traffic noise model has shown that the Preferred Alternative, with these design options, would reduce overall corridor noise levels compared to the No Build Alternative.

Quieter concrete pavement is included as a design feature for Option A, Option K, and the Preferred Alternative; however, because it is not an FHWA-approved mitigation measure and because future pavement surface conditions cannot be determined with certainty, it is not included in the noise model for the project. WSDOT is continuing testing and

evaluation of quieter concrete pavement to determine the best overall pavement type for the project.

Please see the Noise Discipline Report Addendum (Attachment 7 to the Final EIS) for a more detailed discussion.

C-008-193

Please see the response to comment C-008-164, which states that the change to views from the new Portage Bay Bridge would not diminish the integrity of historic resources.

C-008-194

Although Option K's double tunnel may not have had a visual effect on the historic properties in the Portage Bay basin, the Preferred Alternative reduces the effect on historic properties compared to Options A, K, and L. The adverse effects from the Preferred Alternative on historic properties will be mitigated through the terms and conditions in the Programmatic Agreement (Attachment 9 to the Final EIS). WSDOT does not mitigate cumulative effects, including those effects from the concurrent construction of the Sound Transit deep-bore project, because many entities contribute to them in ways that are beyond WSDOT's control. WSDOT does disclose the project's likely contribution to each identified cumulative effect and continues to coordinate with Sound transit concerning the project activities.

C-008-195

Please see the response to comment C-008-164, which states that the change to views from the new Portage Bay Bridge would not diminish the integrity of historic resources. Also see the response to Comment C-008-194 regarding visual effects of Option K.

Through the analyses conducted for the SDEIS, WSDOT determined

that Options K and L would result in higher impacts to natural resources than Option A. Option K, in particular, had substantially greater impacts to wetland and aquatic resources and received a considerable number of negative comments from regulatory agencies. As a result of the SDEIS analysis, direction from the Legislative Workgroup, and input from the community and agencies, FHWA and WSDOT have developed a Preferred Alternative that is similar to Option A, but with a number of design refinements to minimize effects and meets the project purpose and need.

Additionally, the Preferred Alternative further reduces effect on historic properties compared to Options A, K, and L. The adverse effect from the Preferred Alternative on historic properties will be mitigated according to the terms and conditions in the Programmatic Agreement (Attachment 9 to the Final EIS).

C-008-196

Please see the response to Comment C-008-179 regarding the Portage Bay Bridge. The Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) does not discuss SDEIS Options A, K, and L; instead, it addresses the Preferred Alternative that was developed after the SDEIS was published.

C-008-197

Noise walls are not recommended for the Portage Bay Bridge with the Preferred Alternative because the associated noise reduction would not satisfy WSDOT feasibility criteria. The noise modeling of the Preferred Alternative for the Final EIS demonstrated that noise in the Portage Bay area would achieve adequate reduction from the 10th Avenue East and Delmar Drive East lid, the use of noise-absorptive traffic barriers, and the reduced speed limit on the Portage Bay Bridge.

The visual impact of the new Portage Bay Bridge on adjacent views

would be minimized through a context-sensitive design. The Community Construction Management Plan (outlined in Attachment 9 to the Final EIS) will include measures associated with the design process for the Portage Bay Bridge as part of the effort to produce a mutually agreeable final design.

C-008-198

This statement has been updated in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS), which now reads, "The new [Portage Bay] bridge would alter the integrity of setting and feeling [of the Roanoke Park Historic District]. Approximately a third of the contributing properties in the district (roughly 30 to 35 properties, depending on the season) has views of, and would be visually affected by, the replacement bridge."

WSDOT has determined that there would be a visual change to the setting of the Roanoke Park Historic District from the replacement Portage Bay Bridge. However, this visual change would not diminish the integrity of adjacent historic resources because the existing Portage Bay Bridge dominates the existing viewshed.

C-008-199

Please see the response to Comment C-008-163, which states that the number of homes with views of the Portage Bay Bridge has been updated in the Final Cultural Resources Assessment and Discipline Report.

C-008-200

Please see the response to Comment C-008-170, which states that the visual change from the new Portage Bay Bridge will not alter the setting and feeling of historic properties because the existing bridge currently dominates this viewshed.

C-008-201

Since the SDEIS was published, WSDOT and FHWA have developed a Preferred Alternative that is similar to Option A.

WSDOT does not mitigate cumulative effects, including those effects from the concurrent construction of the Sound Transit deep-bore project, because many entities contribute to them in ways that are beyond WSDOT's control. WSDOT does disclose the project's likely contribution to each identified cumulative effect and suggests practicable ways by which the cumulative effect could be mitigated.

C-008-202

Visual effects from the Preferred Alternative will be minimized or mitigated through context-sensitive design and stipulations in the Programmatic Agreement (Attachment 9 to the Final EIS).

C-008-203

As a result of comments on the SDEIS, the height of the bridge above the water has been lowered to reduce visual effects. At midspan, the floating bridge would now be approximately 20 feet above the water, which is approximately 5 to 10 feet lower than previous designs considered in the Draft EIS and SDEIS. The roadway would be about 10 feet higher than the existing bridge. Additionally, noise walls are not recommended for the Evergreen Point Floating Bridge because there are no permanent noise-sensitive land uses in Lake Washington.

C-008-204

The Preferred Alternative would cause some indirect visual and potential noise effects on the Roanoke Park Historic District. Although these impacts would not diminish the integrity of the historic district, their impact will be further minimized through the implementation of the Programmatic Agreement (Attachment 9 to the Final EIS) and the

Community Construction Management Plan (outlined in Attachment 9 to the Final EIS).

See the response to Comment C-008-003 regarding phased implementation. Lids would be built at the same time as the corresponding portion of the corridor.

C-008-205

The requested edit was not made in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) because the Mitigation section was designed to address the mitigation of the project's effect. The section was not intended to discuss indirect, collective, multiple, or cumulative effects. Additionally, the discussion of avoidance and minimization does not include technical meanings, but instead focuses on the measures used to avoid and minimize impacts from construction.

C-008-206

This paragraph has been removed from the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

For informational purposes, the referenced paragraph reads as it does, with the two modal verbs, must and may, because these terms are used in the guiding text from 36 CFR 800.

Section 36 CFR 800.2.ii.2.d, Providing Notice and Information, states that, “[t]he agency official must, except where appropriate to protect confidentiality concerns of affected parties, provide the public with information about an undertaking and its effects on historic properties and seek public comment and input.”

Section 36 CFR 800.2.ii.3.d, Use of Agency Procedures, also states that, “[t]he agency official may use the agency’s procedures for public

involvement under the National Environmental Policy Act or other program requirements in lieu of public involvement requirements in subpart B of this part, if they provide adequate opportunities for public involvement consistent with this subpart.”

C-008-207

Because WSDOT determined that the Miller Street Landfill is not an NRHP-eligible archaeological site, this paragraph has been removed from the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

For informational purposes, data recovery is a mitigation measure.

C-008-208

Because no NRHP-eligible archaeological sites were identified within the Area of Potential Effects, the discussion of data recovery has been removed from the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-008-209

Because no NRHP-eligible archaeological sites were identified within the Area of Potential Effects, the discussion of compensatory mitigation has been removed from the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

Compensatory mitigation was defined, on page 192 of the Cultural Resources Discipline Report (2009), as an alternative form of mitigation for archaeological resources.

C-008-210

To ensure that temporary impacts to the Roanoke Park Historic District during construction do not diminish the integrity of the historic district,

WSDOT has committed to addressing those impacts under NEPA. The retention of existing vegetation where possible was identified as a measure that would minimize the temporary alteration of setting and feeling. Retaining vegetation to the extent reasonable and feasible will be included in the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS).

As possible and where possible, vegetation removal will be delayed. Replanting is generally done once construction activities will no longer affect the site. Interim planting may occur as a regulated erosion control measure. WSDOT will continue to develop the Community Construction Management Plan, in coordination with the Section 106 consulting parties and other affected community members, as part of the ongoing effort to minimize the project effect.

C-008-211

WSDOT is committed to the preservation of historic properties within the Area of Potential Effects. Throughout the construction period, WSDOT will control fugitive dust by employing a number of best management practices and permit conditions, including avoiding grading and excavation of soils and keeping dumpsters covered where appropriate, using tarps to cover piles of soil, and other practices deemed necessary. WSDOT will also adhere to the terms and conditions in the Programmatic Agreement, and implement the mitigation measures in the Community Construction Management Plan (Attachment 9 to the Final EIS), to minimize impacts from construction, including fugitive dust.

C-008-212

Similar text will be included in the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS), which is being developed in coordination with the Section 106 consulting parties.

C-008-213

The noise modeling of the Preferred Alternative for the Final EIS demonstrated that overall noise in the Portage Bay area would decrease compared to the No Build Alternative. Adequate noise reduction would result from the noise-reducing effects of the 10th Avenue East/Delmar Drive East lid, the noise-absorptive traffic barriers, and the lower speed limit across the Portage Bay Bridge. This noise reduction would constitute a beneficial change for the Roanoke Park Historic District.

C-008-214

The Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) does not include specific mitigation measures. See the Programmatic Agreement (Attachment 9 to the Final EIS), developed through the Section 106 consultation process, for specific mitigation measures.

C-008-215

Lids are not mitigation. The lids were designed into the project as a way to avoid and minimize negative project effects and to reconnect communities and landscapes by creating open space, restoring or creating views, and enhancing bicycle and pedestrian movement.

The presence of the lids was noted in the Cultural Resources Discipline Report on page 4, which stated, “[t]he project would include landscaped lids across SR 520 at I-5, 10th Avenue East and Delmar Drive East, and in the Montlake area to help reconnect the communities on either side of the roadway.”

The enhanced pedestrian and bicycle crossing and two lids are also discussed in the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

All major project elements, including the enhanced pedestrian and

bicycle crossing and two lids, will be completed with the portion of the project in which they are located.

C-008-216

WSDOT has read and considered, as well as responded to, every official SDEIS comment letter.

C-008-217

This letter is a duplicate of the letter submitted separately by Erin O'Connor. Please see the responses to comments in item Number C-022.