



The City of Seattle

Pike Place Market Historical Commission

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AWV Facilities Team
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August 15, 2011

MHC 128/11

Angela Angove
Alaskan Way Viaduct Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Angove:

O-004-001

The Pike Place Market Historical Commission identified inadequate evaluation of potential adverse effects to the Pike Place Market Historic District (Attachment A) in the Alaskan Way Viaduct Replacement Project Final Environmental Impact Statement and requests that additional information be included in the Project's Record of Decision.

Constructive use of Pike Place Public Market under Section 4(f) of the National Transportation Act through construction activities at Victor Steinbrueck Park, the PC-1 Site, and Western Avenue due to Alaskan Way Viaduct demolition and Elliott/Western Connector work is not identified in the FEIS Exhibit 4(f)-2. Preliminary Elliott/Western Connector drawings prepared in 2009 by Boris Dramov for FHWA, WSDOT, and SDOT (Attachments B-E) were not identified in Appendix C (Exhibit 1-1, page 1-8) of the FEIS under transportation discussion.

The following points identify areas of insufficient information in the FEIS relative to the issue stated above and other impacts to the Pike Place Market Historical District anticipated by the Pike Place Market Historical Commission:

O-004-002

- 1) FEIS- Project Area, item 21 asks, "What community and social services serve these neighborhoods?" (Alaskan Way Viaduct Replacement Project Final EIS, p.103) While Pioneer Square and Belltown are rightfully mentioned due to the high number of social services available in these areas, services in the Pike Place Market are not. The concentration of social services within this comparatively small district include; the Pike Market Clinic, Food Bank, senior housing, and low-income residences. The Food Bank in particular operates very close to the existing Viaduct, and the senior housing, "Heritage House" is located immediately adjacent to the Viaduct. Low-income housing is located adjacent to Western Avenue in the LaSalle Addition and Leland Building. These social services should be listed in the Record of Decision.

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O-004-001

FHWA has been fully involved and carefully reviewed the Final Section 4(f) Evaluation for this project, which is included with the Final EIS. This evaluation considers potential constructive use of the Section 4(f) resources, including the Pike Place Market Historic District, and concludes there are none (see Final EIS Section 4(f) Chapter, Question 9).

The 2009 drawings that show the Elliott/Western Connector are not drawings of the Bored Tunnel Alternative. Both the Cut-and-Cover Tunnel and Elevated Structure Alternatives include connections to Elliott and Western Avenues. However, the Elliott/Western Connector is not a part of the Bored Tunnel Alternative (see Appendix B, Alternatives Description and Construction Methods). Since the Elliott/Western Connector is not part of the Bored Tunnel, it is not included in the Section 4(f) evaluation of that alternative.

O-004-002

The text in the Final EIS is a summary of the information contained in the discipline reports. The project acknowledges the presence of social resources in the Pike Place Market area, and they are discussed in the Final EIS Appendix H, Social Discipline Report, Chapter 4.

These resources will not be called out specifically in the Record of Decision; however, the mitigation measures described in the Project Commitments section of this Record of Decision to address effects on social resources and minority and low-income populations do apply to them.

O-004-003

2) On p. 124 in Appendix H, Social Discipline Report, it says, "Construction impacts that would affect minority and low-income populations in the project area include traffic congestion, reduced mobility, reduced transit service, increased air emissions, and increased noise." The Record of Decision needs to include mitigation measures that would be taken to protect the low-income population in the Market that lives adjacent to Western Avenue and on First Avenue.

O-004-004

3) On pp. 23-24 in Appendix M, Air Discipline Report, it says, "Exposure assessments are difficult because it is difficult to accurately calculate annual concentrations of MSATs near roadways and to determine the portion of a year that people are actually exposed to those concentrations at a specific location." Within the Market Historical District in the 1500 block of Western Avenue, in addition to the Market Clinic, Food Bank, senior and low-income housing, the Pike Market Childcare Center & Preschool's playground immediately adjacent to Western Avenue. The daycare includes low-income children. The low-income residences, food bank and daycare are important to preserving the Pike Place Market Historical District's history serving the low-income population in Seattle. On p. 34 in Appendix T 2010 SDEIS Comments and Responses, your response to concerns raised by the Dept of Ecology about the impact of the project on low-income residents, was that, "Currently available technical tools do not allow a prediction of the project-specific health effects that would result from the potential emission changes associated with a project." The Commission is concerned about the impact of increased vehicle exhaust, specifically Mobile Source Air Toxics (MSATs) on the low-income residents, senior residents, food bank users, and the daycare's playground, all adjacent to Western Avenue.

O-004-005

4) In Appendix M, the Air Discipline Report, you include information concerning the long-term effect of the Bored Tunnel on air quality. You seem to have mainly concentrated on seven intersections, (Yesler and 1st Ave, Columbia St and 1st Ave, Denny Way and Dexter Avenue, Denny Way and Aurora Ave northbound, Mercer St and Fairview Ave N, Mercer St and Westlake Ave N, Mercer St and Dexter Ave North). The entire project area is located within a "maintenance area," that is an area once classified as a non-attainment area, but which has since been demonstrated attainment of National Ambient Air Quality Standards, (NAAQS). Are the seven intersections, including the tunnel portals, the areas that you considered the most problematic? What of the long-term effects on air quality near the Pike Place Market, particularly in the vicinity of Western Avenue?

O-004-006

5) In Appendix B, on p. 46 there is a description of a rubble lot near Lenora Street where construction rubble will be dumped and stored. A map on p. 49 (Attachment F) shows the rubble lot northwest of Victor Steinbrueck Park. The Record of Decision needs to include information on how noise and dust will be controlled at the site so that it does not impact visitors at Victor Steinbrueck Park.

O-004-007

6) The map on p. 49 in Appendix B (Attachment F) appears to show staging areas in the Right of Way on Western Avenue, within the Pike Place Market Historical District. The staging areas within the District must be described in the Record of Decision along with

O-004-003

The Record of Decision Project Commitments section includes mitigation measures to address effects on low-income and minority populations in the project area.

O-004-004

FHWA understands your concern about MSATs affecting sensitive populations adjacent to Western Avenue. The Final EIS Appendix M, Air Discipline Report, discusses the results of the MSAT analysis during project operation in Chapter 5. For the Bored Tunnel Alternative, the conclusion states that future MSAT concentrations in the project area are projected to be lower than existing concentrations, even with increased VMT (due to EPA's national control programs). MSATs in the study area are predicted to substantially decrease in the future compared to existing conditions (Section 5.2.3 of Appendix M).

O-004-005

Section 3.4.3 of the Final EIS Appendix M, Air Discipline Report, describes the process that lead to the selection of these seven intersections for analysis. First, major intersections in the project area that may be affected by the project were identified. Then these intersections were evaluated for traffic volumes and level of service under all the build alternatives for the design year 2030 and ranked according to the results. The highest ranked intersections for each condition were selected for analysis.

The air quality analysis for the project concludes that regional MSAT emissions are not expected to increase and no exceedances of the NAAQS are expected; therefore, no significant adverse effects on air quality are expected to result from the project.

- O-004-007** | any mitigation measures to be taken to protect residents, the Market Childcare & Preschool and businesses along Western Avenue within the District from the potential impacts of the staging areas.
- O-004-008** | 7) On p. 122 in Appendix H, Social Discipline Report, Western Avenue is listed as one of the streets on the construction-related truck haul routes. Will this include Western Avenue between Union and Virginia? If so, can the truck haul route be moved to an arterial outside of the Historical District?
- O-004-009** | 8) The FEIS indicates that there will be measures implemented to help business owners and neighborhoods maintain viability during construction, including: a communications plan, providing information for alternative transportation modes and parking, use of best practices, an assurance of continual access, and a construction schedule that considers peak and seasonal shopping periods.
- What is the process for Market tenants to directly receive reimbursement funds if their businesses are damaged due to Viaduct project-related activities?
- How will information about the construction process be communicated to Market businesses? When will outreach begin?
- Is there a budget to assure adequate public notification so people know in advance and can make plans?
- O-004-010** | 9) You show potential ground disturbance because of construction of the Bored Tunnel, as occurring between Yesler Way and S. Seneca St. Do you anticipate ground disturbance as a result of tunnel boring in the vicinity of the Pike Place Market?
- O-004-011** | 10) Measures to minimize harm to Victor Steinbrueck Park and supporting garage structure are not adequately described. The park is part of the Pike Place Public Market Historic District and subject to Pike Place Historical Commission review and Certificate of Approval requirements.
- O-004-012** | 11) The project's monitoring and enforcement program is inadequate since the Pike Place Public Market Historical District is not identified as a Section 4(f) resource, leaving undefined protection measures at Victor Steinbrueck Park for visitors. Victor Steinbrueck Park is an integral part of the market's function. Ongoing use of the parking garage beneath Victor Steinbrueck Park and the Desimone parking lot adjacent the garage is essential for Market visitors and vendors. Both are immediately adjacent the Alaskan Way Viaduct. The Record of Decision needs to include clarification as to whether or not demolition of the viaduct would require closure of these parking areas.
- O-004-013** | 12) Were all the areaways in the Pike Place Market Historical District physically inspected?
- O-004-014** | 13) What is the process for communicating about fixing buildings, structures or streets within the District that are damaged by the project?

O-004-006

The BNSF/Lenora Street Construction Zone discussed on page 73 of the Final EIS (and also page 49 of Appendix B) is a strip of right-of-way along the viaduct between about Pine Street and Bell Street. This area would be used during the last year of construction for viaduct demolition and resurfacing Alaskan Way. In Chapter 8 of the Final EIS, Question 11 discusses mitigation measures proposed for noise, and Question 24 discusses air quality effects. An MOA between WSDOT and the Puget Sound Clean Air Agency is in place to identify appropriate mitigation measures to help eliminate, confine, or reduce construction-related emissions, such as dust. WSDOT will create a plan for controlling fugitive dust during construction. This fugitive dust control plan will control fugitive dust generated during construction activities in order to minimize dust effects to neighbors and other projects.

Mitigation is discussed in the Project Commitments section of the Record of Decision.

O-004-007

Exhibit 3-1 in Appendix B of the Final EIS shows a construction staging area (labeled with the number 15) that is a strip of right-of-way along Alaskan Way parallel to the existing viaduct. This area would be used for demolition and removal of the viaduct structure. Mitigation measures for effects during construction are discussed in the Final EIS, Chapter 8, Questions 9 through 29 and in the Project Commitments section of the Record of Decision.

O-004-008

Haul routes will use City of Seattle designated truck routes and will be more specifically identified during final design. However, the project will not be using Western Avenue between Union and Virginia Streets as a haul route.

O-004-015

14) The following information in Appendix C, Transportation Discipline Report and Appendix I, Historic Cultural and Archaeological Resources Report, suggests that under the Deep Bore Tunnel Alternative there will be an increase in traffic on the waterfront and arterials near the waterfront:

On p. 1-11 it says, "The Bored Tunnel Alternative (non-tolled) is expected to result in the highest number of vehicle through-trips along the corridor of the three build alternatives and a noticeable increase in vehicles along arterials near the waterfront due to the lack of ramps at Elliott and Western Avenues."

On pp. 1-16 -1-17, Appendix C, it says, "under tolled conditions, vehicles would divert from SR 99 when tolling is implemented. For example, diversion from SR 99 under the Bored Tunnel Alternative with tolling is forecasted to be approximately 39 percent of daily vehicles compared to the Bored Tunnel Alternative without tolling. These diverted vehicle trips would instead be distributed across Alaskan Way, parallel arterials, and I-5."

On p. 1-21, Appendix C, it says, "Under the Bored Tunnel Alternative, Alaskan Way is expected to carry more vehicles than it would under the other alternatives because it would be the primary access route from SR 99 into downtown from the south, and it would accommodate traffic to 15th Avenue via Elliott and Western Avenues."

On p. 1-21, Appendix C, it says "The ability of Alaskan Way to serve as a primary travel corridor for Elliott/Western traffic is limited by the rail crossing at Broad Street and multiple cross streets. The Elliott/Western Connector, proposed as part of the Program, would address this issue."

On p. 100 in Appendix I, it says traffic will be increased in Pioneer Square. Since Western Avenue begins in Pioneer Square and feeds north through the Market, it is presumed that traffic will increase on Western Avenue in the Market as drivers cut through. On p. 101 it says that Pioneer Square was historically active with considerable traffic, therefore increased volume would not impact the integrity of the district. However Western Avenue where it cuts through the Pike Place Market Historical District is not currently congested and is described by SDOT staff as "sleepy".

Western Avenue is an arterial street that parallels Alaskan Way. The Pike Place Market Historical District includes Western Avenue from about Union Street to past Virginia Street (see enclosed map, Attachment A). This section of Western Avenue presently does not bring excessive traffic volume through the District and is slow-paced and pedestrian friendly. Given the statements as noted above from Appendix C, it seems fair to assume that there will be an increase in traffic on Western Avenue in the Historical District, coming from the south on Western from side streets that connect to Alaskan Way, from the new Elliott/Western Connector, and from southbound Elliott Avenue.

The Commission is charged with protecting the character and integrity of the Historical District as cited in SMC 25.24.01:

O-004-009

Measures to protect businesses and property owners during construction are described in Chapter 8 of the Final EIS and included in this Record of Decision in the Project Commitments section. Planning and evaluation of the Bored Tunnel Alternative shows that Pike Place Market tenants will not be damaged and therefore will not need compensation or remedy from the project. The communications program for the project will include tenants, property owners, and organizations at and around the Pike Place Market. This outreach will begin before construction effects occur. Fortunately for the Pike Place Market area, the majority of these effects will not happen until 2016 when the existing viaduct is scheduled for demolition. Budgets for the outreach effort have not been established separately from the overall project costs.

O-004-010

Potential ground disturbance between Yesler Way and Seneca Street would be the result of utility relocation and viaduct demolition rather than tunnel boring. As illustrated in Exhibit 2-3 of Appendix I of the Final EIS, potential ground disturbance as a result of utility relocation and viaduct demolition would also occur along surface Alaskan Way and within the footprint of the Alaskan Way Viaduct from Yesler Way to Battery Street. None of this ground disturbance is a result of tunnel boring.

Ground disturbance as a result of tunnel-induced settlement is discussed in Chapter 6, Question 13 of the Final EIS and Section 6.1.2 of Appendix I of the Final EIS. Ground disturbance as a result of tunnel-induced settlement would be negligible in the vicinity of the Pike Place Market Historic District. Only two historic properties would be adversely affected by tunnel-induced settlement, the Western and Polson buildings, both located in the Pioneer Square-Skid Road Historic District. No historic properties within or in the vicinity of the Pike Place Market Historic District would be adversely affected by tunnel-induced settlement.

O-004-015

"In order to promote the educational, cultural, farming, marketing, other economic resources, and the general welfare; and to assure the harmonious, orderly, and efficient growth and development of the municipality, it is deemed essential by the people of the City that the cultural, economic, and historical qualities relating to the Pike Place Markets and the surrounding area, and an harmonious outward appearance and market uses which preserve property values and attracts residents and tourists be preserved and encouraged.,,"

The Commission believes that the statements in Appendix C and Appendix I indicate that there will be an increase in traffic on Western Avenue in the Historical District. Seattle Municipal Code 25.24.040 Section D states that, "The District possesses integrity of location, original construction, use, and of feeling and association" and Section E states that, "Preservation of the District will retain a characteristic environment of a period of Seattle's history while continuing a vital cultural and economic aspect of the City." The Commission requests that mitigation measures be included in the Record of Decision to protect Western Avenue within the Historical District as a slow-paced, pedestrian friendly street that does not move excessive volumes of traffic through the District in order to protect the integrity of the District.

O-004-016

15) On p. 99 in Appendix I, Historic Cultural and Archaeological Resources Report, it says that an unusable Viaduct would result in "significantly increased traffic and congestion throughout the downtown area and also that it " could also result in loss of access and altered traffic patterns that could result in adverse effects due to degraded economic viability of the Pioneer Square Historic District and the Pike Place Market Historic District and interference with the continued use and maintenance of the historic buildings in these districts." Figures published elsewhere in the FEIS suggest that a tolled tunnel would produce the same amount of traffic due to drivers bypassing the tolled tunnel. How will this impact Western Avenue?

O-004-017

16) Portions of Western Avenue within the Pike Place Public Market Historic District would be subject to use under Section 4(f) under the preferred alternative through the Elliott/Western Connector work. FHWA responsibility for the Elliott/Western Connector Section 4(f) evaluation remains unclear. These were not identified in the FEIS Exhibit 4(f)-2.

O-004-018

17) Anticipated traffic volumes along the Western Avenue through the Pike Place Public Market Historic District are needed to determine potential impacts to the historic district. Discussion of the Bored Tunnel Alternative starting on page 244 of the FEIS Section (4)f Evaluation does not mention the Elliott/Western Connector, even though these are identified in Appendix C (Exhibit 1-1, page 1-8) of the FEIS under transportation discussion, particularly under tolled conditions.

O-004-019

18) On pp. 82 and 84 of Appendix D, it says, "The potential visual effects of the new Elliott/Western Connector are discussed in the Final EIS, Chapter 7, Cumulative Effects Analysis." However, there is no additional information on the impact of the Connector on views in Chapter 7 and no information is provided in Appendix B or in FEIS Chapter 7 on the height of the new Elliott/Western Connector as it relates to

O-004-011

The Pike Place Market Historic District and Victor Steinbrueck Park were both identified as Section 4(f) resources that were evaluated for potential use in the Final EIS as shown in Exhibit 4(f)-5 on pages 259 through 261. Victor Steinbrueck Park is discussed in Chapter 6, Question 21 of the Final EIS as one of the resources that would experience indirect effects from increased traffic congestion during construction.

Transportation mitigation measures are described in Chapter 8, Question 9 of the Final EIS and in the Project Commitments section of the Record of Decision. Parking affected during construction is described in the Final EIS Chapter 6, Question 18 (and shown in Exhibit 6-22) as well as in Appendix C, Transportation Discipline Report, Section 6.9. The Bored Tunnel Alternative is not expected to directly effect the Public Market Garage.

O-004-012

The Pike Place Market Historic District and Victor Steinbrueck Park were both identified as Section 4(f) resources that were evaluated for potential use in the Final EIS as shown in Exhibit 4(f)-5 on pages 259 through 261. The public parking affected during construction is described in the Final EIS Chapter 6, Question 18 (and shown in Exhibit 6-22) as well as in Appendix C, Transportation Discipline Report, Section 6.9. There are no affected public parking lots or garages directly adjacent to Pike Place Market.

O-004-013

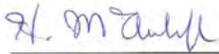
All accessible areaways within the zone of influence (settlement trough) within the Pike Place Market Historic District were evaluated as part of a building assessment. The areaway condition was observed during site visits and observations were noted on each of the building assessment forms.

O-004-019

Victor Steinbrueck Park, therefore the Commission is not able to determine whether or not the Connector, included as part of the Deep Bore Tunnel Program, will impact views from the Park.

Sincerely,

Spencer Howard, Commission Chair
By:



Heather McAuliffe, Commission Coordinator
Pike Place Market Historical Commission

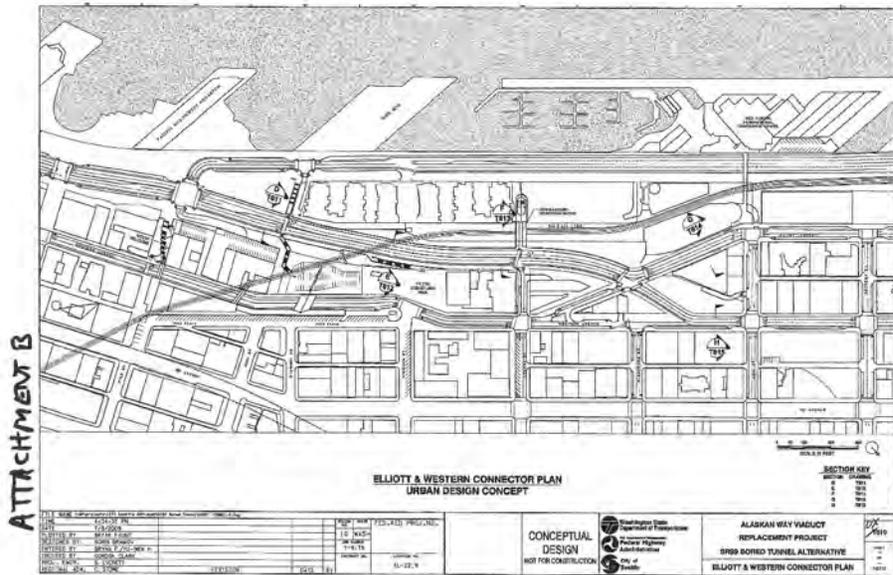
Cc: Ben Franz-Knight, Pike Place Market Preservation & Development Authority

O-004-014

The claims and repair process by which owners of buildings, including historic buildings, can file claims for damages to their properties that may result from construction of this project are discussed in Chapter 8, Questions 17 and 28 of the Final EIS, and Appendix I, Section 6.1.2 and Attachment C. WSDOT, in consultation with the State Historic Preservation Officer and the Department of Archaeology and Historic Preservation, will develop a claims and repair process, which will include: the damage claim submittal process; the process by which damage claims will be inspected and evaluated; the process for and personnel involved in preparing damage evaluations, repair cost estimates, findings and recommendations; the process for making and documenting repairs based on the reported cost estimates and recommendations; and, the process for making appeals. WSDOT will ensure that an architect meeting the Secretary of the Interior's Standards for historic architecture will participate in the claims and repair process for any historic buildings and that all work on such buildings will follow the Secretary of the Interior's Standards for the Treatment of Historic Properties and will be done in compliance with the City of Seattle's Municipal Code, including review and approval by the Pike Place Market Historic Commission, as required. This claims and repair process was a commitment made by FHWA and WSDOT within the Section 106 Memorandum of Agreement for this project, which is included with this Record of Decision.

O-004-015

Information related to level of service and intersection delay expected at several intersections along Western Avenue with the proposed action is provided in the Final EIS Exhibits 5-12 and 5-13, and Appendix C, Transportation Discipline Report, specifically Sections 5.3 and 7.4 and Exhibits 5-28 and 7-57. These data indicate that intersection delay at intersections along Western Avenue are expected to be similar between the Tolloed and Non-Tolloed Bored Tunnel. Furthermore, as shown in



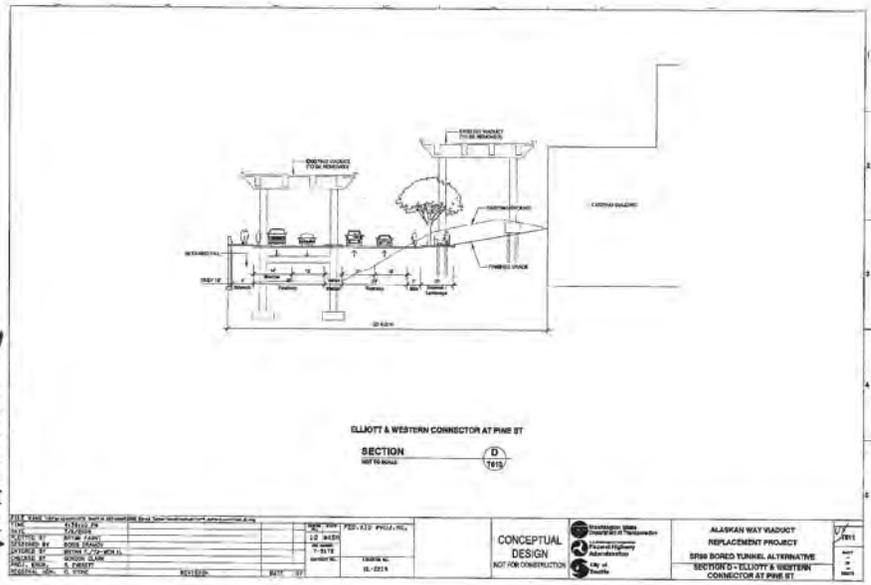
O-004-018

The Section 4(f) analysis in the Final EIS does not consider the Elliott/Western Connector because it is not part of the proposed action. The Elliott/Western Connector is an independent project that will be evaluated through its own environmental review process. Information related to level of service and intersection delay expected at several intersections along Western Avenue with the proposed action is provided in the Final EIS Exhibits 5-12 and 5-13, and Appendix C, Transportation Discipline Report, specifically Sections 5.3 and 7.4 and Exhibits 5-28 and 7-57. These data indicate that intersection delay at intersections along Western Avenue are expected to be similar between the Tolloed and Non-Tolloed Bored Tunnel.

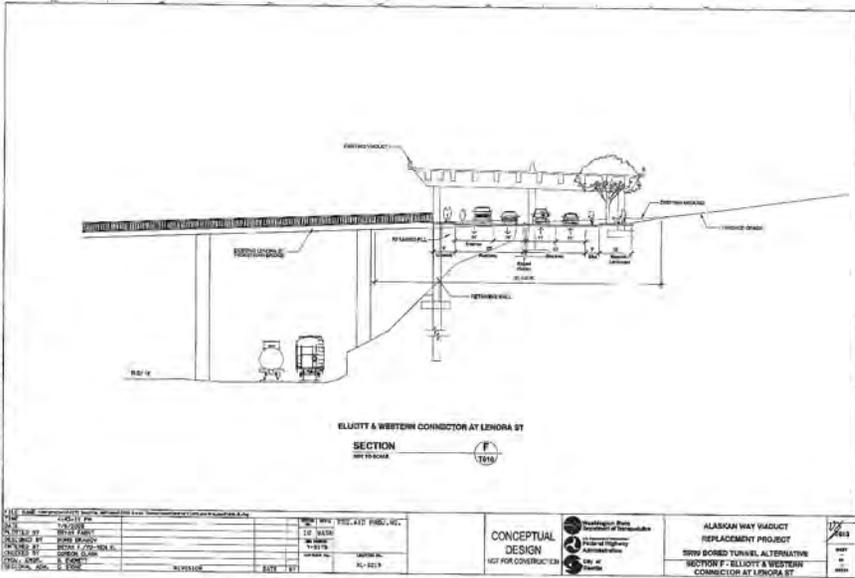
O-004-019

The Final EIS evaluated the cumulative effects of other reasonably foreseeable projects, such as the Elliott/Western Connector in Chapter 7 of the Final EIS. Specific details, such as the height of the Elliott/Western Connector are unknown at this time. The effects of the Elliott/Western Connector project will be evaluated through a separate environmental process.

ATTACHMENT C



ATTACHMENT D



PROJECT: ALASKAN WAY VIADUCT REPLACEMENT PROJECT SHEET: SECTION F - ELLIOTT & WESTERN CONNECTOR AT LENORA ST DATE: 08/2011 DRAWN BY: [Name] CHECKED BY: [Name]	PROJECT: ALASKAN WAY VIADUCT REPLACEMENT PROJECT SHEET: SECTION F - ELLIOTT & WESTERN CONNECTOR AT LENORA ST DATE: 08/2011 DRAWN BY: [Name] CHECKED BY: [Name]	CONCEPTUAL DESIGN NOT FOR CONSTRUCTION		ALASKAN WAY VIADUCT REPLACEMENT PROJECT S100 BOBOL TOWER ALTERNATIVE SECTION F - ELLIOTT & WESTERN CONNECTOR AT LENORA ST	08/11 1/1 1/1 1/1
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ATTACHMENT F



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Staging Areas

Exhibit 3-1
Construction Staging Areas