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13 December 2010  
Via Email

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

Re: Comments on the Supplemental DEIS and Section 4(f)  
Evaluation for the Alaskan Way Viaduct Replacement Project

Dear Ms. Freudenstein:

This letter provides comments on the 2010 Supplemental Draft Environmental Impact Statement (SDEIS) for the Alaskan Way Viaduct Replacement Project. I am writing on behalf of Historic Seattle, which is Seattle and King County's only nonprofit membership organization dedicated to preserving our architectural legacy. Our mission is to educate, advocate and preserve. Historic Seattle is also a Section 106 Consulting Party in this process.

From our review of the SDEIS and Section 4(f) Evaluation, the most adverse impacts appear to be in the Pioneer Square Historic District, listed on the National Register of Historic Places and designated as a City of Seattle historic district. **Following are our concerns regarding impacts to historic and cultural resources.**

**-The Pioneer Square Historic District as a whole will be adversely affected, directly and indirectly.**

In the Section 4(f) Evaluation, the historic district is not included as a "resource subject to use under 4(f)," but some individual resources within the district are subject to use. How does 4(f) apply in a National Register-listed district such as the Pioneer Square Historic District? Why are the effects on the district as a whole not considered an impairment on the district?

Pioneer Square is the city's original business district defined by the interplay of buildings and structures, system of alleys, sidewalks, areaways, and streets. The pedestrian-friendly character of the district will be greatly impacted by the tens of thousands of vehicles expected to go through city streets (specifically Pioneer Square streets) as a result of the proposed south portal for SR 99. Can this old and historic infrastructure, built on fill, carry the heavy loads and volumes of traffic that are projected? Since there is no central downtown access proposed, Pioneer Square will be taking the "hit" as a thoroughfare for city traffic. Is there a plan to deal with these traffic impacts to the streets of the historic district to protect its pedestrian character?

The Section 106 Cultural Discipline Report (Appendix I) does not adequately recognize indirect effects to the historic district. It focuses on direct effects to specific buildings during construction. How will the considerable traffic impacts to the historic district be dealt with after construction of the preferred alternative (Bored Tunnel) is completed?

#### **-Building Damage Assessment**

Exhibit 6-2 (Potential Effects on Historic Properties) in Appendix I (pp. 97-98) focuses on potential damage to 15 buildings within the Pioneer Square Historic District and outside the district. How accurate are the effects determination? What happens if the effects are greater than anticipated? The majority of the effects are classified as “slight” at this point. What if, in reality, they become “moderate” or worse? What are the proposed actions to deal with this potential?

The building damage assessment (pp. 95-96) focuses on the Western Building and Polson Building, both contributing resources to the historic district, because they will be adversely affected by construction. Section 6.2.1 (Built Environment Resources, p. 103) states that (in reference to the Western Building) “Given the current condition of the building, demolition may be the only safe option.” It goes on to say, “Further analysis of the building options is being performed.” What are these options? Where are the structural engineer’s report and cost estimates for stabilizing the structure? Are there different ways to structurally stabilize the building? A temporary, exterior, steel frame is mentioned as needed to stiffen and strengthen the building. A temporary exterior, steel frame was used to shore up the Cadillac Hotel Building in Pioneer Square after the 2001 Nisqually earthquake so there is precedent in the district for similar treatment. Many also thought the Cadillac Hotel could not be saved after the earthquake, yet it was successfully rehabilitated and since 2005, has stood as a model for restoration in Pioneer Square. Granted, the foundation conditions are probably different and there are other issues at play here.

WSDOT should consider carefully the ramifications of demolishing a contributing resource in the Pioneer Square Historic District. The district has not lost a building in a long time (if you don’t count the King Dome). The point is made clearly in the SDEIS that the existing condition is poor but this takes nothing away from its value to the district. Neither Section 106 nor Section 4(f) take cost into consideration. It appears the proposed mitigation measures for the Polson Building would stabilize the structure during construction and not jeopardize it.

Thank you for the opportunity to comment.

Sincerely,



Eugenia Woo  
Director of Preservation Services