



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240



AUG 7 2008

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Ms. Angela Freudenstein
Environmental Manager
Washington State Department of Transportation
999 Third Avenue, Suite 2424
Seattle, WA 98104-4019
southviaductEA@wsdot.wa.gov

WSDOT
AWW/SR519
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Dear Ms. Freudenstein:

The Department of the Interior (Department) reviewed the Draft Environmental Assessment (DEA) and Draft Section 4(f) Evaluation for **State Route 99 South Holgate Street to South King Street Viaduct Replacement Project, Seattle; King County, Washington**, and offers the following comments.

Section 4(f) Evaluation Comments

A-001-001 The Department concurs that there is no prudent and feasible alternative to the use of Section 4(f) resources. We defer to the Washington State Department of Transportation (WSDOT), Federal Highway Administration (FHWA), Department of Archeology and Historic Preservation (DAHP), Advisory Council on Historic Preservation (ACHP), affected tribes, and the City of Seattle, which will develop the Memorandum of Agreement and requirements contained therein related to the viaduct. We also support completing documentation on the viaduct structure in accordance with Level 2 Historic American Engineering Record (HAER) standards.

The Department is particularly concerned with National Historic Landmarks (NHLs) in the project vicinity. It appears that the Pioneer Building, Pergola, and Totem Pole, located on 1st Avenue, Yesler Way, and Cherry Street, will not be adversely affected by the project since this NHL is located approximately four (4) blocks north of the project's northern boundary of South King Street. The Panama Hotel NHL is also located some distance from the viaduct.

A-001-001

The project is pleased to receive the Department's concurrence that there is no prudent or feasible alternative to the use of Section 4(f) resources. The project has developed a Memorandum of Agreement relating to the demolition of the Alaskan Way Viaduct. The Level 2 Historic American Engineering Record documentation relating to the viaduct structure will also be completed.

A-001-002 | Section 6(f) of the Land and Water Conservation Fund Act

There are not any 6(f) impacts from this project.

Section 7 of the Endangered Species Act (ESA)

The Department reviewed the submitted documentation and the ESA/Section 7 Letter of Concurrence issued jointly by the Fish and Wildlife Service (FWS) and National Marine Fisheries Service (NMFS) during June of 2008.

Content from the DEA is broadly consistent with earlier documentation (i.e., the Biological Assessment and supporting documentation).

There are no outstanding issues or matters involving the authority of the FWS.

Contact Information

For questions concerning Section 4(f), please contact Kelly Powell, Regional Environmental Coordinator, at (206) 220-4106, kelly_powell@nps.gov, or 168 South Jackson Street, 2nd Floor, Seattle, Washington, 98104-2853.

For questions concerning Section 6(f), please contact Heather Ramsay, Project Manager, at (206) 220-4123, heather_ramsay@nps.gov, or 909 First Avenue South, 5th Floor, Seattle, Washington, 98104-1060.

For questions concerning Section 7, please contact Ryan McReynolds, Transportation Liaison, at (360) 753-6047, ryan_mcreynolds@fws.gov, or Fish and Wildlife Service-WWFWO (Lacey), Consultation and Technical Assistance Division, 510 Desmond Drive Southeast, Suite 102, Lacey, Washington, 98503-1263.

Thank you for the opportunity to provide these comments.

Sincerely,



Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

A-001-002

The project is pleased to receive both the Department's concurrence that there are no Section 6(f) impacts, and the ESA/Section 7 Letter of Concurrence in June 2008.