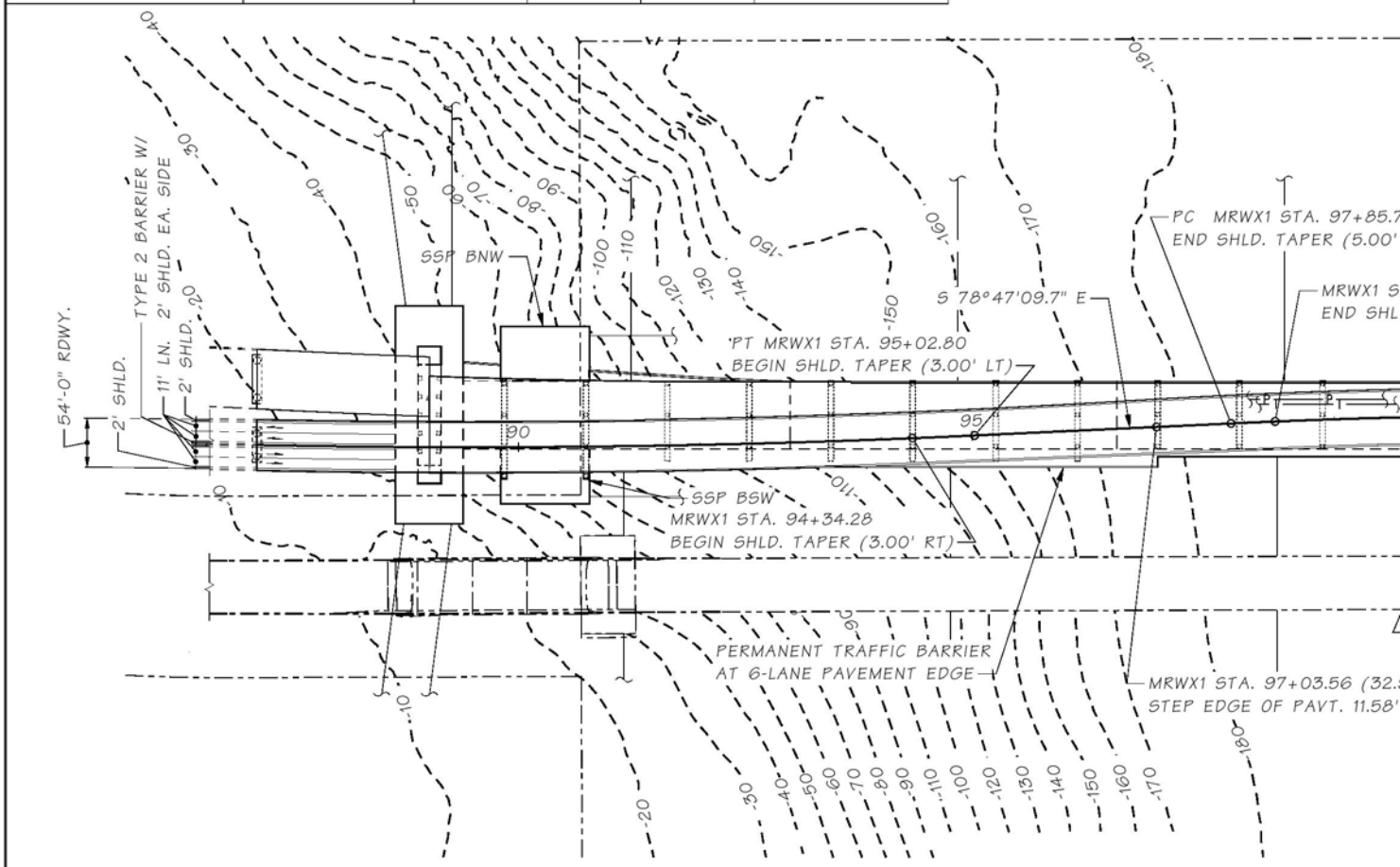
CURVE DATA

P.I. STATION	Δ	RADIUS	TANGENT	LENGTH	BK. TANGENT BRG.
MRWX1 STA. 99+81.42	2°41'52.9" RT	8310.00'	195.69'	391.31'	S 78°47'09.7" E
MRWX1 STA. 88+52.65	6°22'25.4" LT	11701.00'	651.50'	1301.65'	S 72°24'44.3" E



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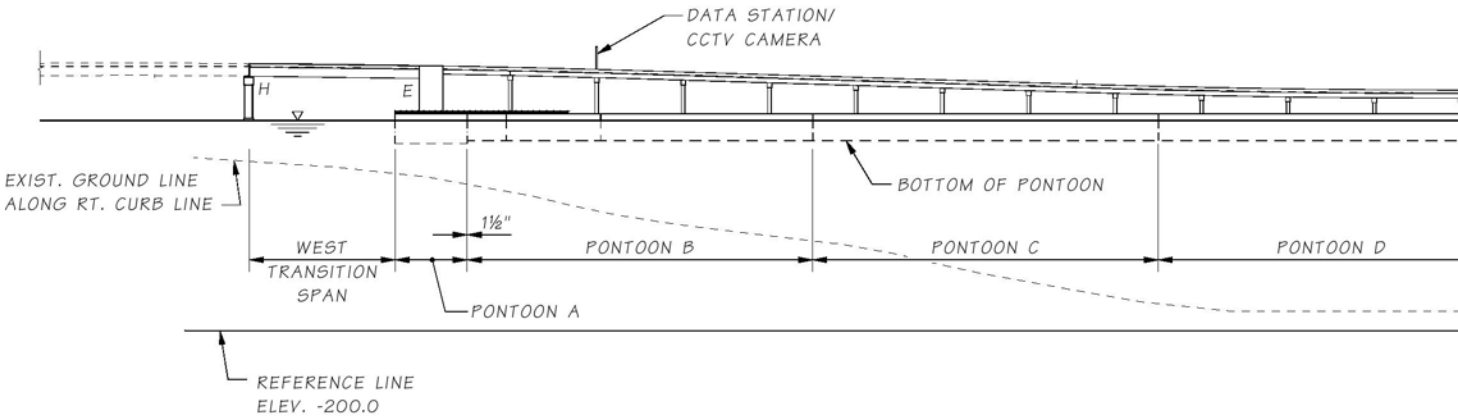

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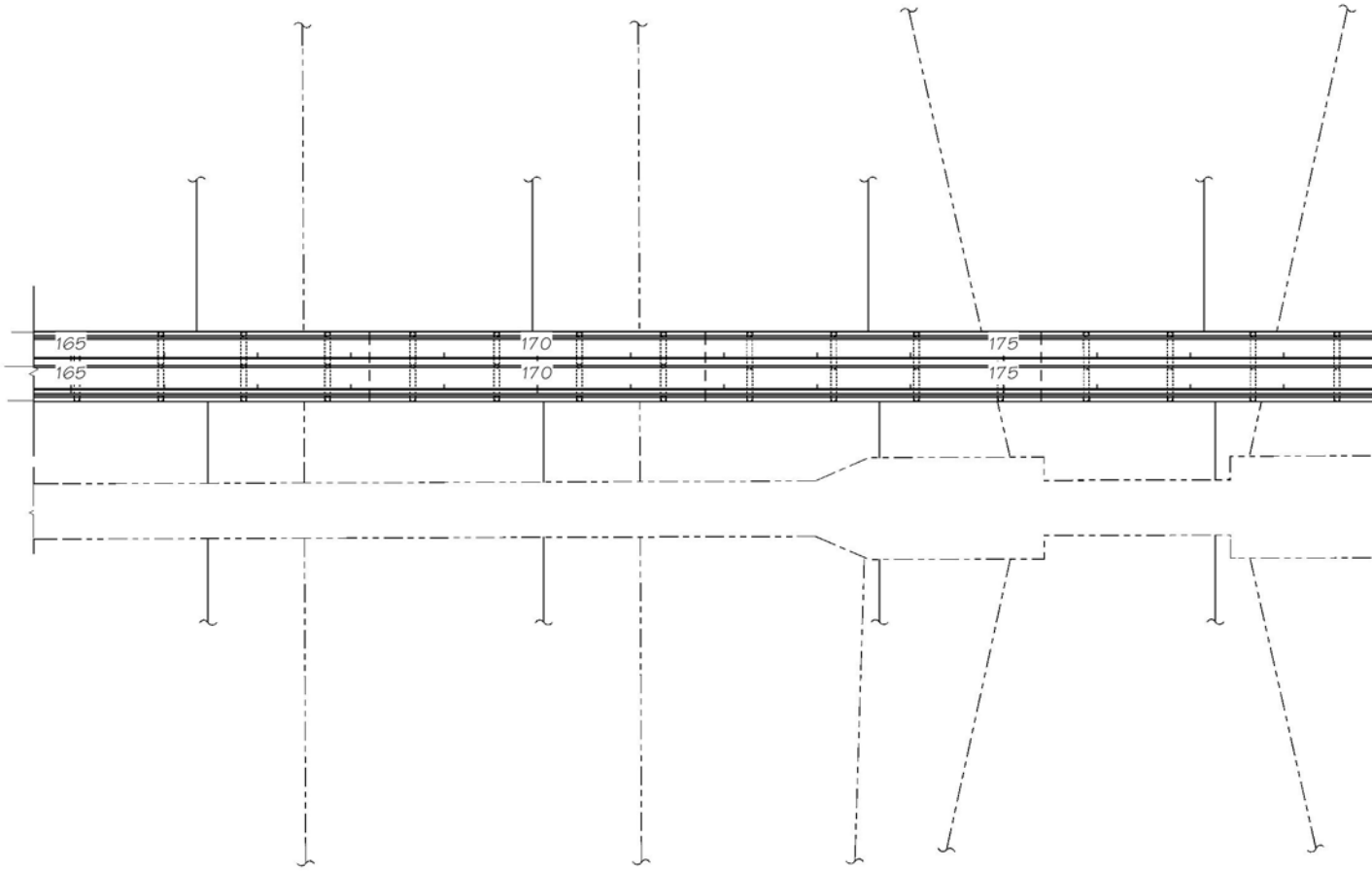
Bridge Design Engr.	Khaleghi, B	M:\W-Team\SR 520 FLOATING BRIDGE\PRELIMINARY PLAN\Window files\LAYOUT 4 LANE-1.WND			REGION NO.	STATE	FED. AID PROJ. NO.	SHEET NO.	TOTAL SHEETS
Supervisor	Clarke, PT				10	WASH.			
Designed By									
Checked By	Ferluga, E / Olson, D 03/09								
Detailed By	Puryear, D 03/09				JOB NUMBER				
Bridge Project Engr.									
Bridge Plan By	Messmer, A / Aldrich, B	09/09	NEW SHEET	TL					
Architect/Specialist	Kinderman, P	DATE	REVISION	BY	APP'D				

Thu Sep 24 08:22:46 2009

SR 520 FILE NO. ____ SHEET 8 OF 18



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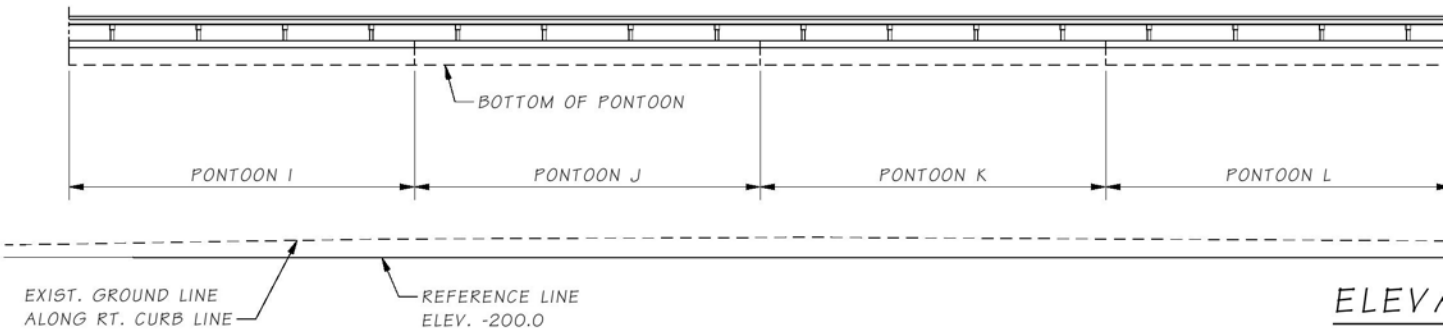

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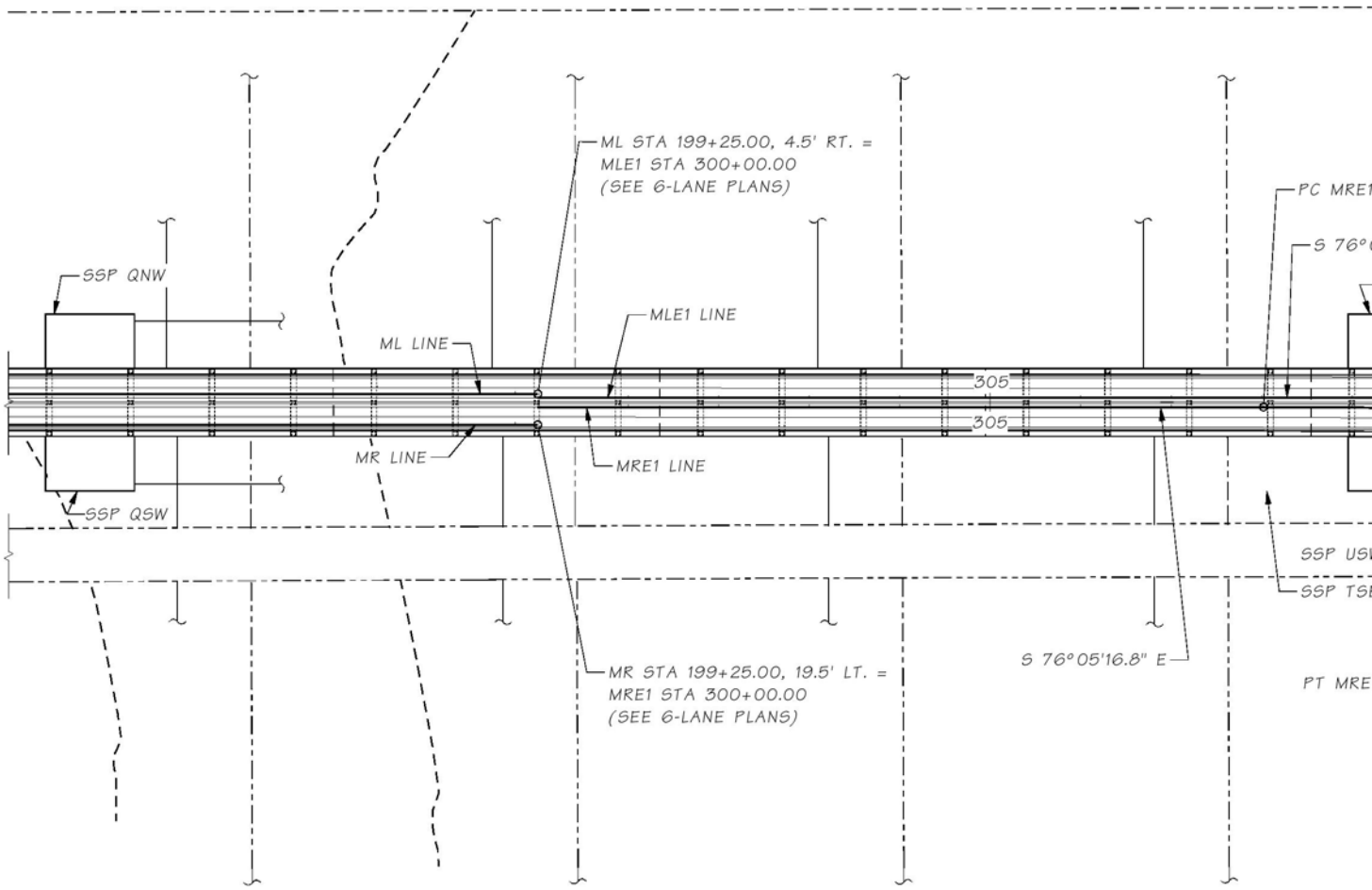
Designed By										
Checked By	Ferluga, E	03/09								
Detailed By	Puryear, D	03/09				JOB NUMBER				
Bridge Project Engr.										
Bridge Plan By	Messner, AD	09/09	NEW SHEET	TL						
Architect/Specialist	Kinderman, P	DATE	REVISION	BY	APP'D					

Thu Sep 24 08:23:00 2009

SR 520 FILE NO. ____ SHEET 9 OF 18

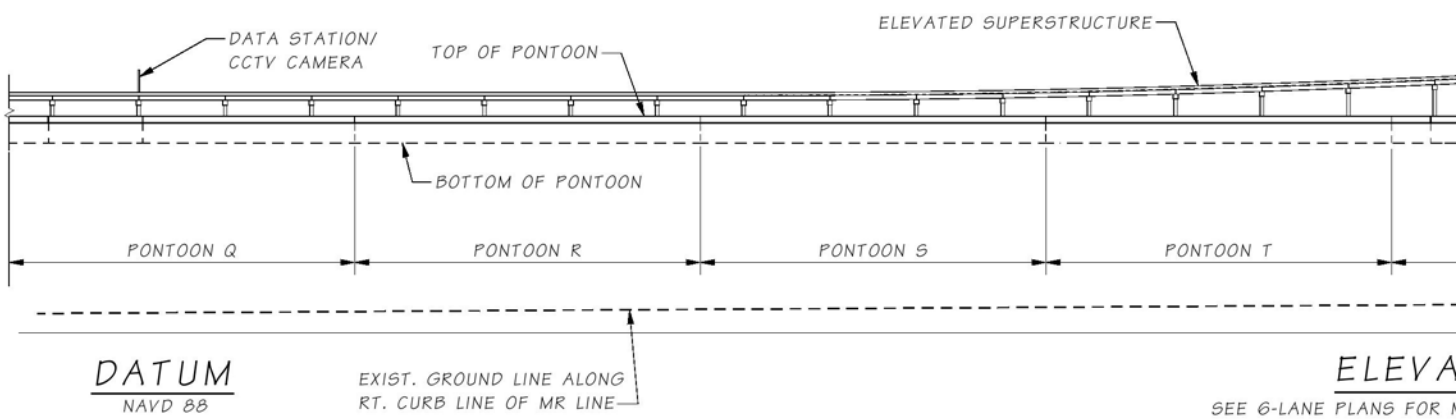
CURVE DATA

P.I. STATION	Δ	RADIUS	TANGENT	LENGTH	BK. TANGENT BRG.
MLE1 STA. 321+73.63	3°52'14.1" RT	11680.00'	394.67'	789.04'	S76°05'16.8"E
MRE1 STA. 309+68.98	1°44'06.5" RT	11026.00'	166.97'	333.91'	S76°05'16.8"E
MRE1 STA. 319+68.42	5°21'31.5" RT	9011.00'	421.70'	842.78'	S74°21'10.3"E



PLAN

MLE1 & MRE1 LINE USED FOR C
SEE 6-LANE PLANS FOR ML & M



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ANCHOR CABLES NOT

SR 520 FILE NO. ____ SHEET 10 OF 18

Bridge Design Engr.	Khaleghi, B	M:\W-Team\SR 520 FLOATING BRIDGE\PRELIMINARY PLAN\Window files\LAYOUT 4 LANE-3.WND							
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Designed By						10	WASH.			
Checked By	Ferluga, E / Olson, D 03/09									
Detailed By	Puryear, D 03/09					JOB NUMBER				
Bridge Project Engr.										
Prelim. Plan By	Messmer, A / Aldrich, B	09/09	△ NEW SHEET	TL						
Architect/Specialist	Kinderman, P	DATE	REVISION	BY	APP'D					

Thu Sep 24 08:23:10 2009

CURVE DATA

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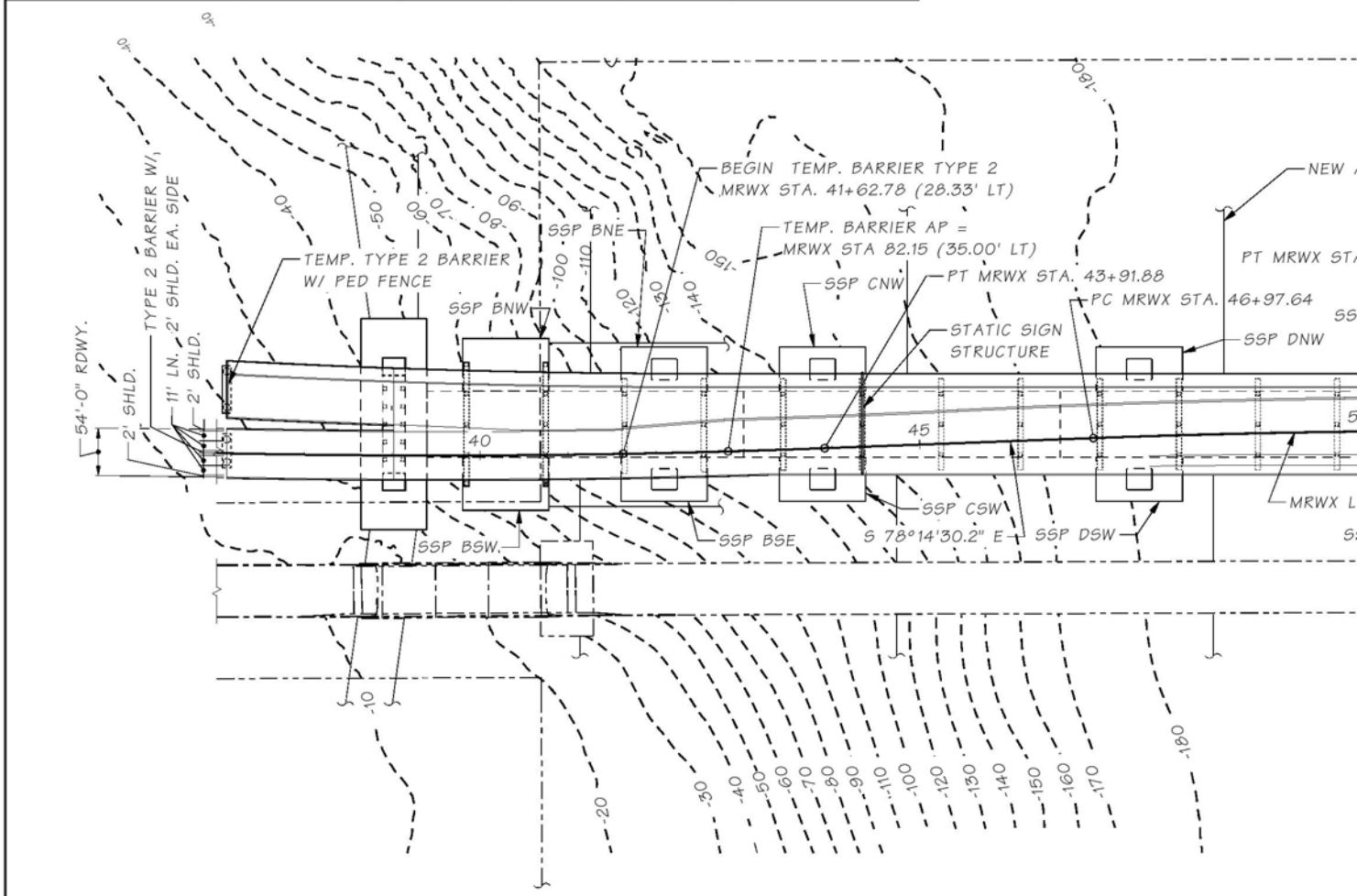
MRWX STA. 49+17.00	2°09'13.4" RT	11670.00'	219.36'	438.67'	S 78°14'30.2" E



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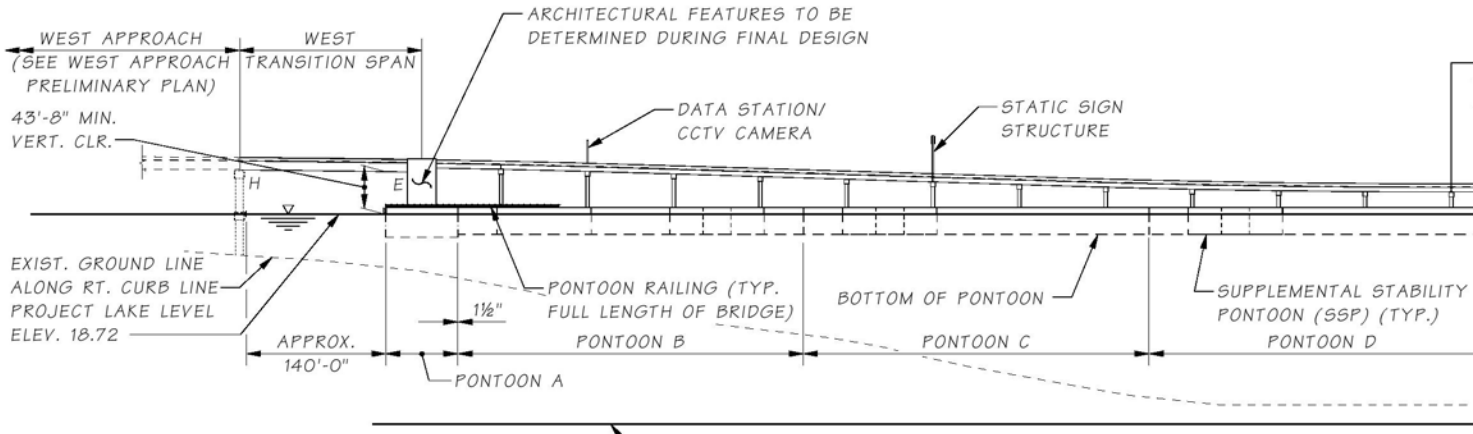

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Bridge Design Engr. Khaleghi, B	M:\W-Team\SR 520 FLOATING BRIDGE\PRELIMINARY PLAN\Window files\LAYOUT 6 LANE INTER-1.WND				REGION NO.	STATE	FED. AID PROJ. NO.	SHEET NO.	TOTAL SHEETS
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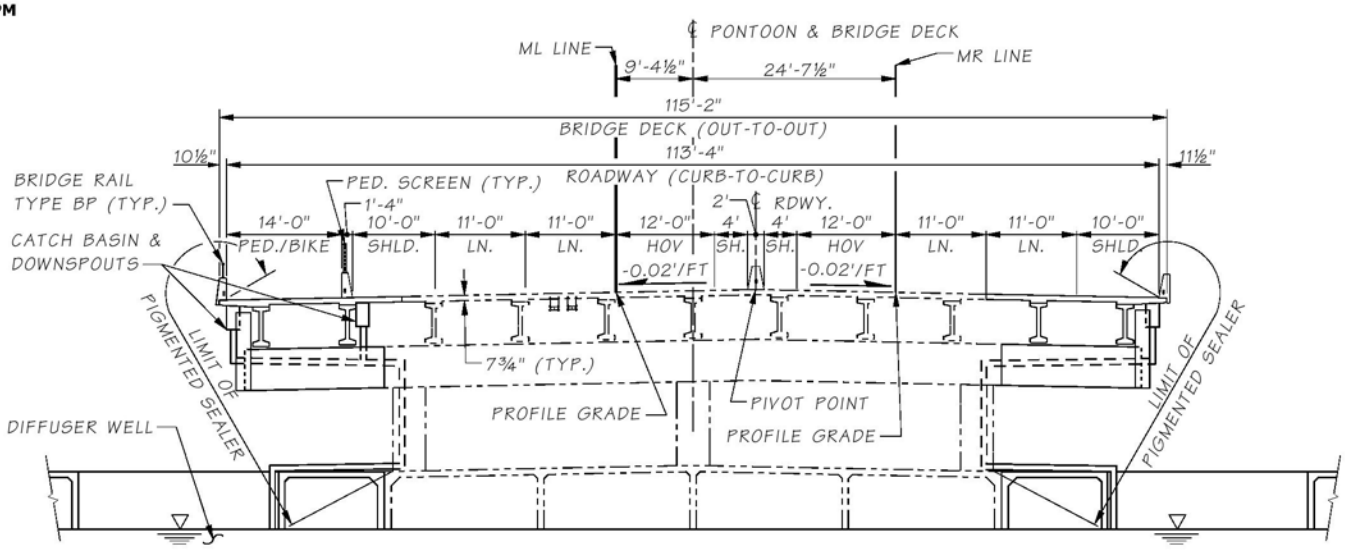
Designed By 05/09									
Checked By Ferluga, E / Olson, D									
Detailed By Puryear, D 05/09					JOB NUMBER				
Bridge Hydraulic									
Bridge Plan By Messmer, A / Aldrich, B	09/09	NEW SHEET	TL						
Architect/Specialist	DATE	REVISION	BY	APP'D					

Thu Sep 24 08:23:24 2009

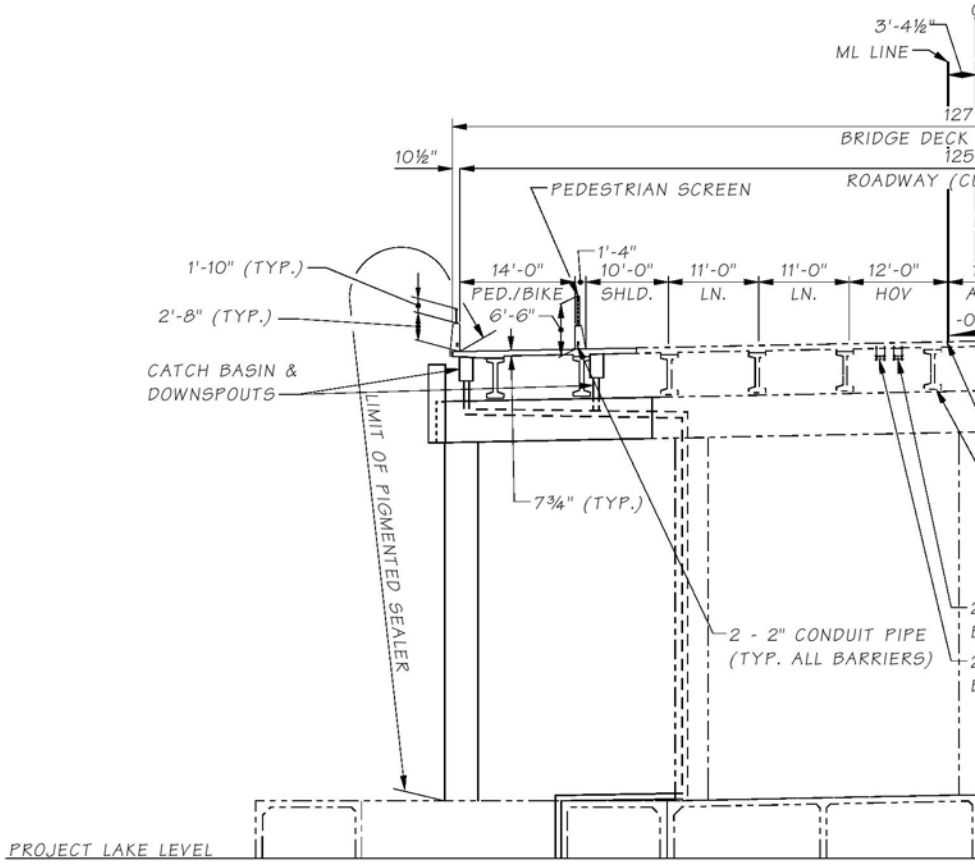
SR 520 FILE NO. ____ SHEET 11



TYPICAL SECTION (6-LANE)

FLOATING BRIDGE NEAR MID-SPAN

SEE TYPICAL SECTION NEAR BENT VI FOR DETAILS NOT SHOWN.



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Bridge Design Engr.	Khaleghi, B		M:\W-Team\SR 520 FLOATING BRIDGE\PRELIMINARY PLAN\Window files\TYP SECTIONS 1.WND							
Supervisor	Clarke, PT					REGION NO.	STATE	FED. AID PROJ. NO.	SHEET NO.	TOTAL SHEETS
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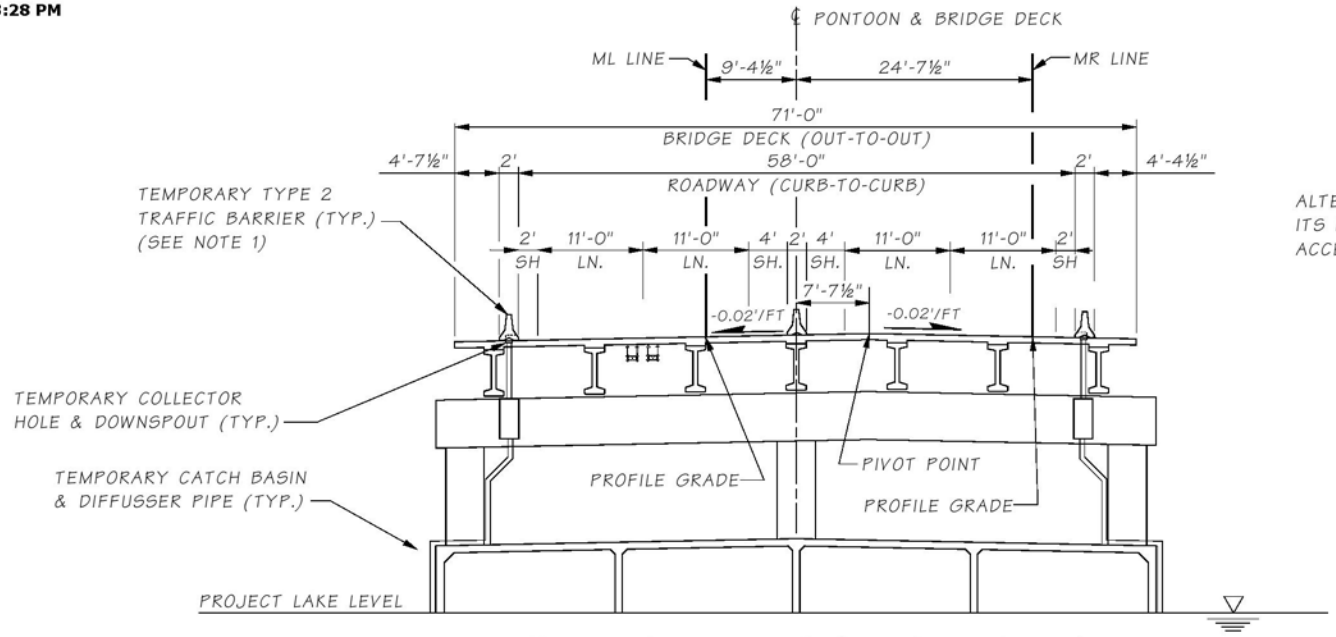
Checked By	Ferluga, E	03/09								
Detailed By	Puryear, D	03/09				JOB NUMBER				
Bridge Project Engr.										
Bridge Plan By	Messner, AD	09/09	NEW SHEET	TL						
Architect/Specialist	Kinderman, P	DATE	REVISION	BY	APP'D					

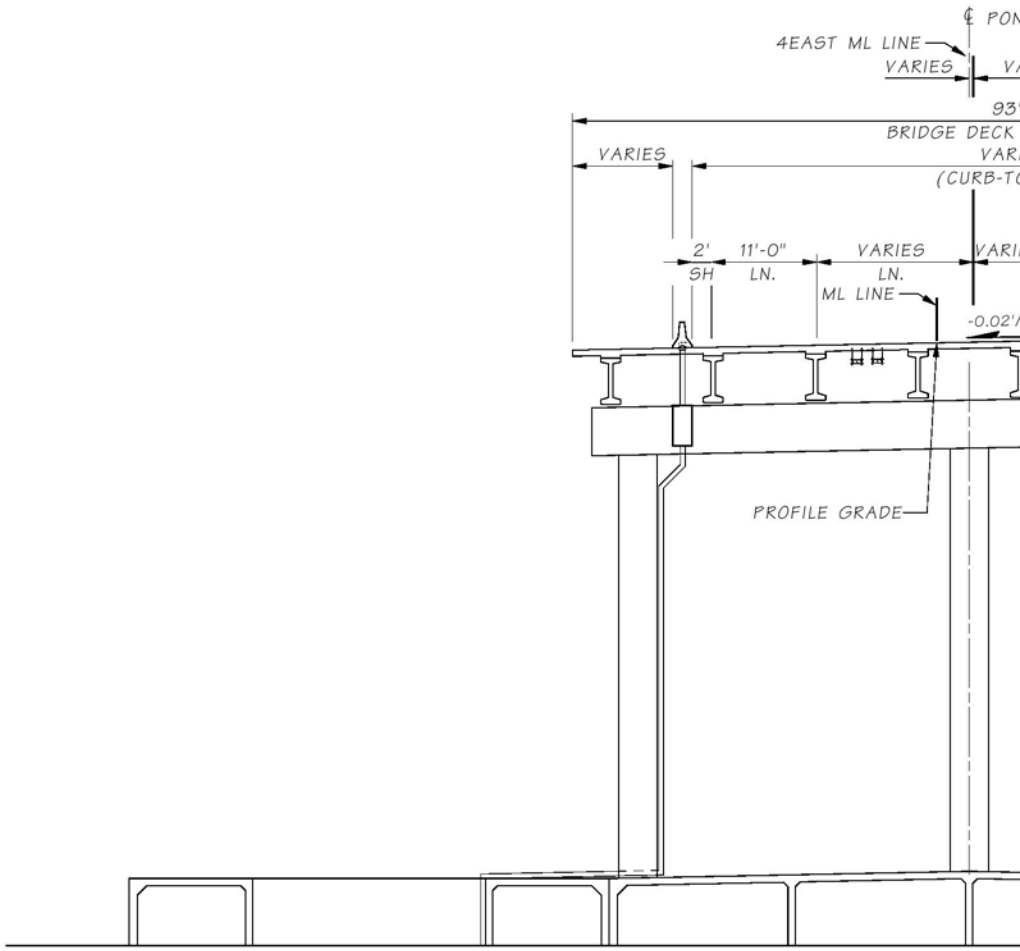
Thu Sep 24 08:24:31 2009

SR 520 FILE NO. ____ SHEET 12 OF 18



TYPICAL SECTION (4-LANE)

FLOATING BRIDGE NEAR MID-SPAN
SEE TYPICAL SECTION NEAR BENT VI FOR DETAILS NOT SHOWN.



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Bridge Design Engr.	Khaleghi, B	M:\W-Team\SR 520 FLOATING BRIDGE\PRELIMINARY PLAN\Window files\TYP SECTIONS 2.WND								
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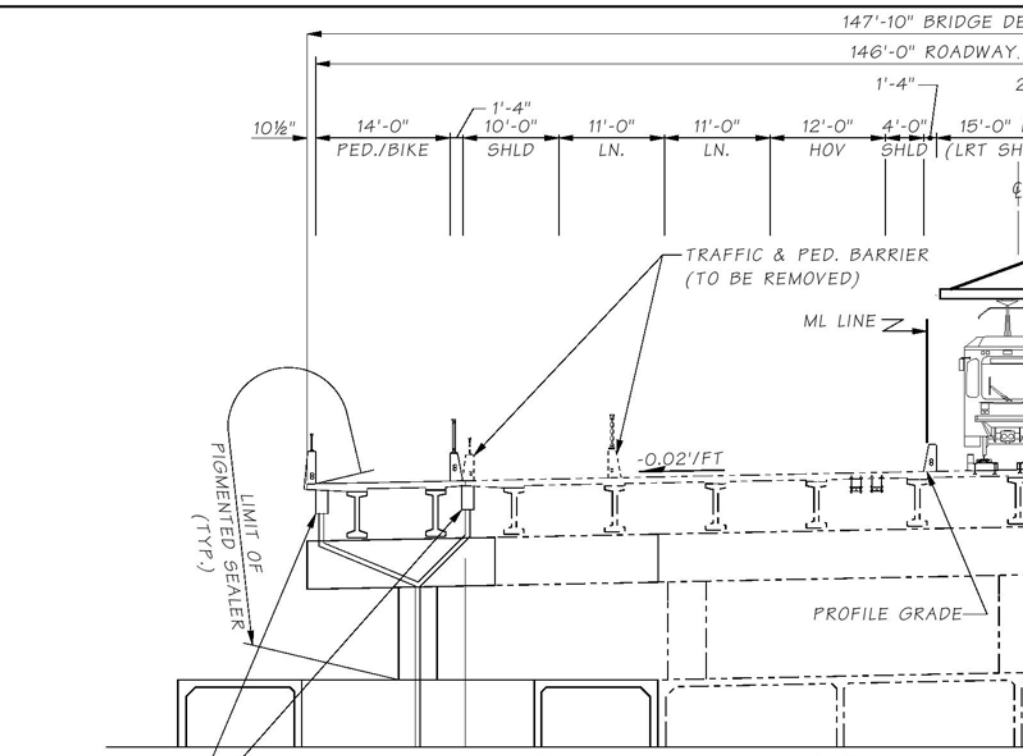
Designed By						10	WASH.			
Checked By	Ferluga, E 03/09									
Detailed By	Puryear, D 03/09					JOB NUMBER				
Bridge Project Engr.										
Prelim. Plan By	Messmer, AD	09/09	NEW SHEET	TL						
Architect/Specialist	Kinderman, P	DATE	REVISION	BY	APP'D					

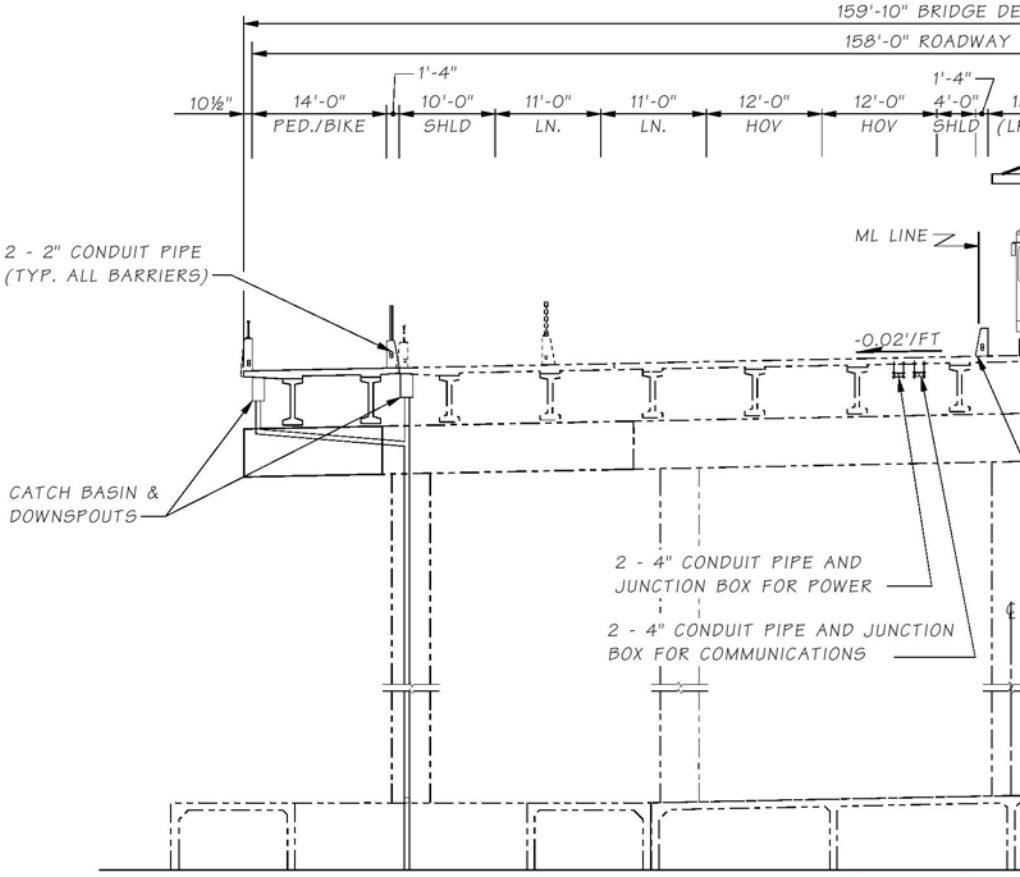
Thu Sep 24 08:24:42 2009

SR 520 FILE NO. ____ SHEET 13 OF 18



TYPICAL SECTION - FUT

FLOATING BRIDGE
SEE TYPICAL SECTION NEAR BEN



TYPICAL SECTION - FUT

FLOATING BRID
SEE TYPICAL SECTION NEAR MID

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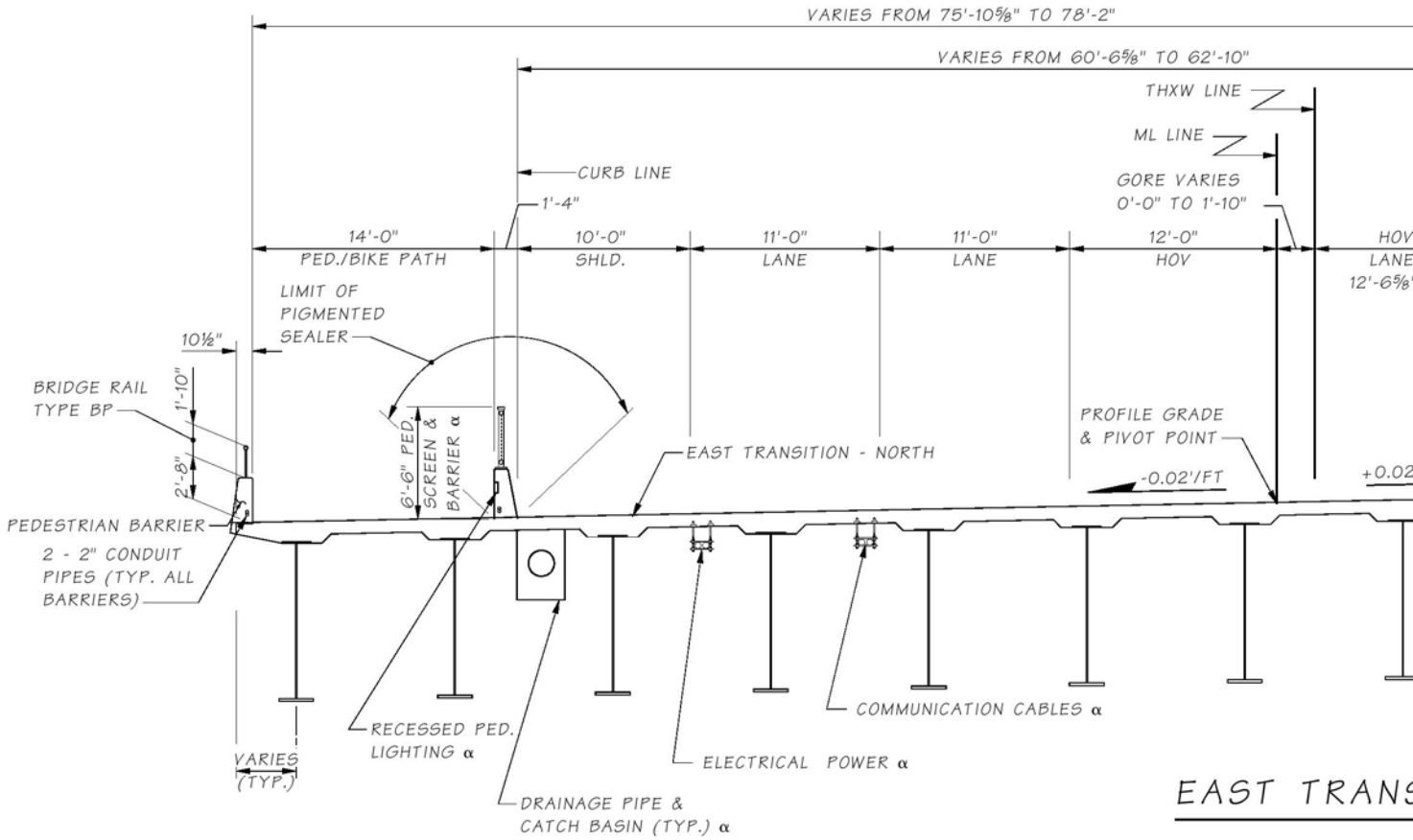
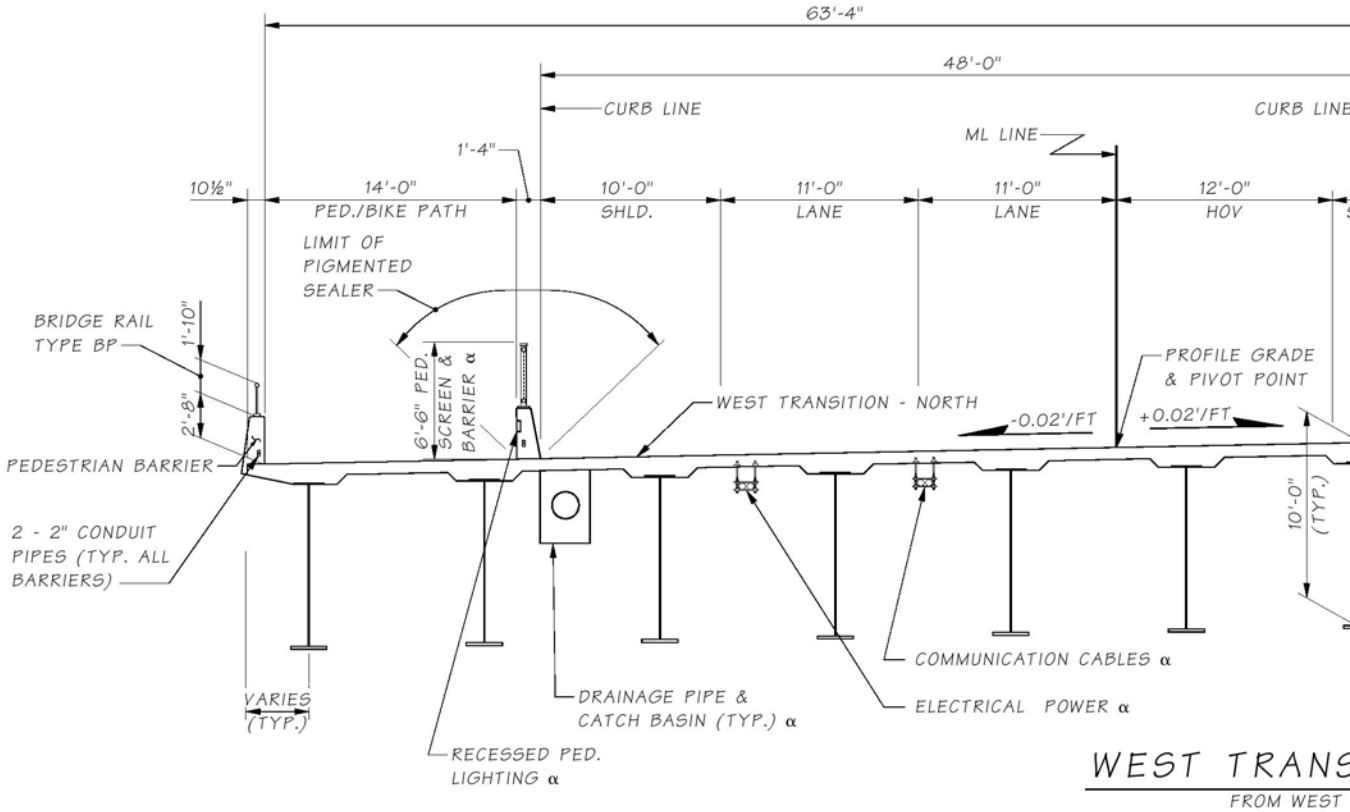
Supervisor	Clarke, PT						REGION NO.	STATE	FED. AID PROJ. NO.	SHEET NO.	TOTAL SHEETS
Designed By							10	WASH.			
Checked By	Ferluga, E	03/09									
Detailed By	Puryear, D	03/09					JOB NUMBER				
Bridge Project Engr.											
Prelim. Plan By	Messmer, AD		09/09	NEW SHEET	TL						
Architect/Specialist	Kinderman, P		DATE	REVISION	BY	APP'D					

Thu Sep 24 08:25:25 2009

SR 520 FILE NO. ____ SHEET 14 OF 18





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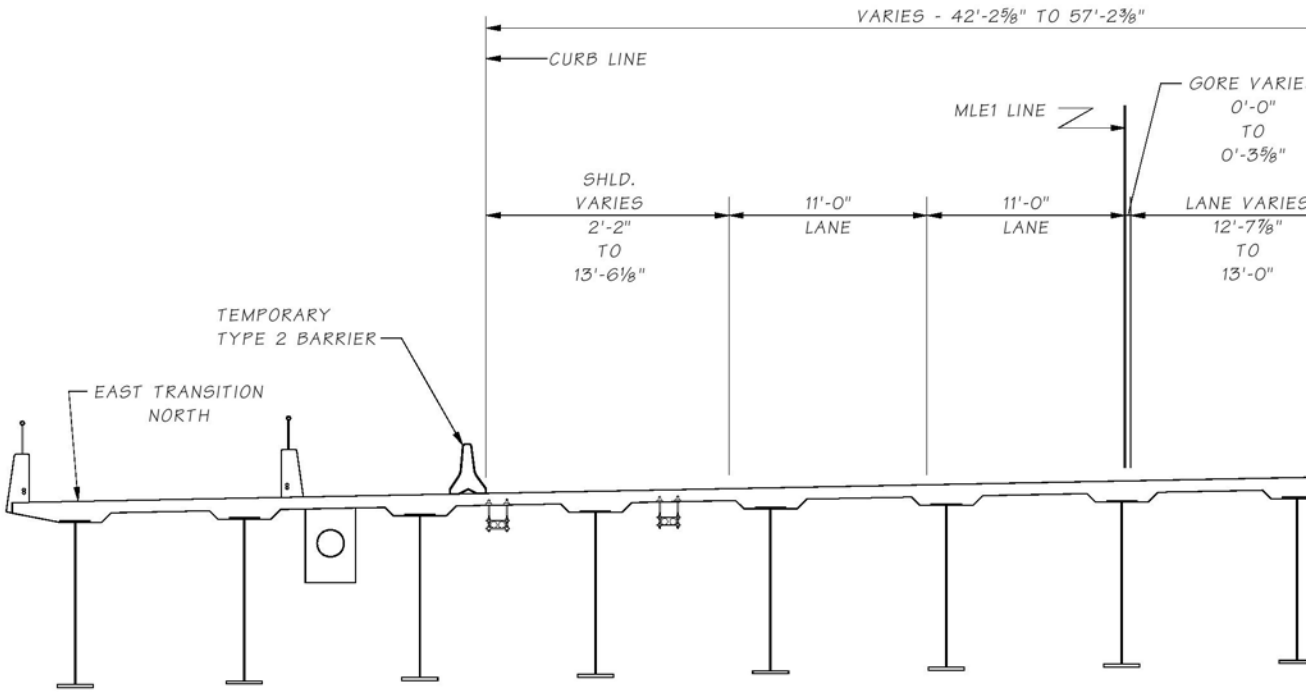
Designed By										
Checked By	Aldrich, BS	03/09								
Detailed By	Lemons, T	03/09				JOB NUMBER				
Bridge Project Engr.										
Bridge Plan By	Olson, D	09/09	NEW SHEET	TL						
Architect/Specialist	Kinderman, P	DATE	REVISION	BY	APP'D					

Thu Sep 24 08:24:52 2009

SR 520 FILE NO. ____ SHEET 15 OF 18



EAST TRANSITION

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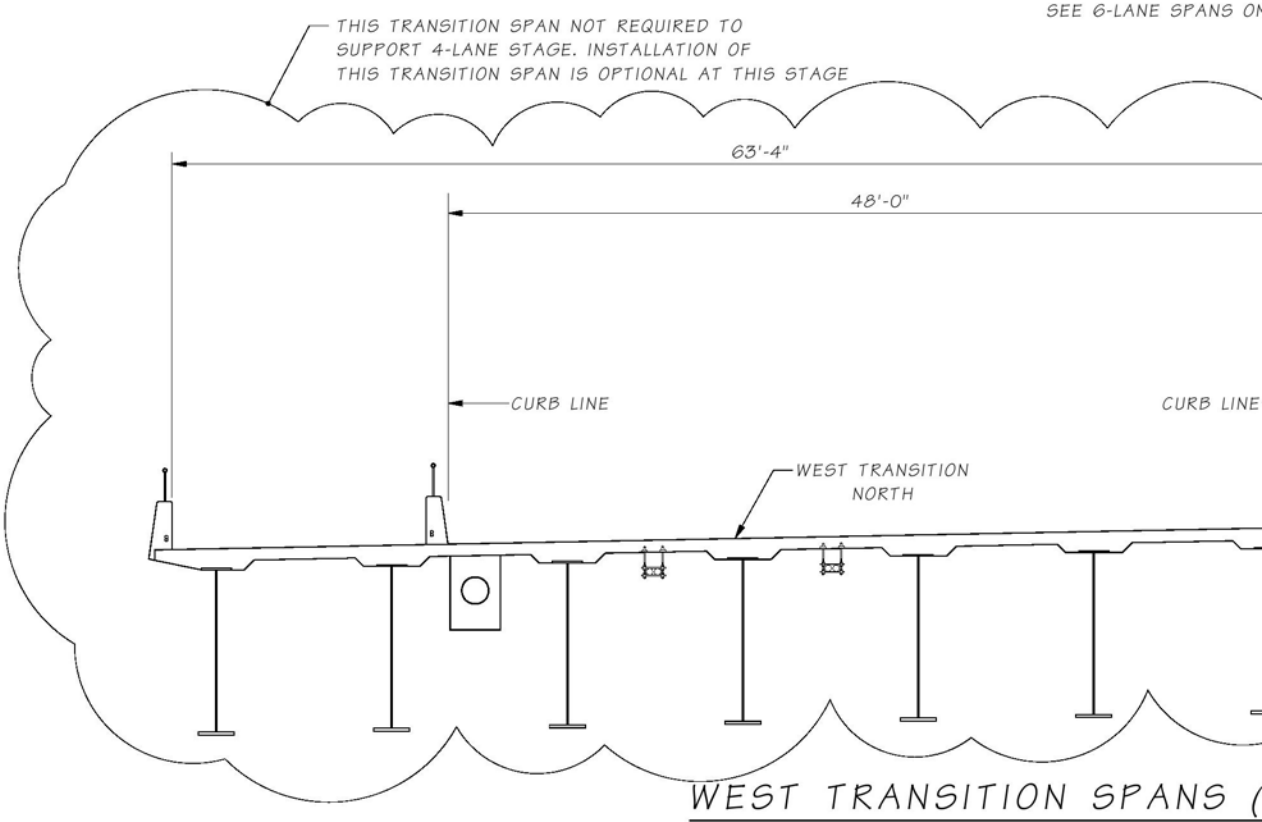
SEE 6-LANE SPANS ON



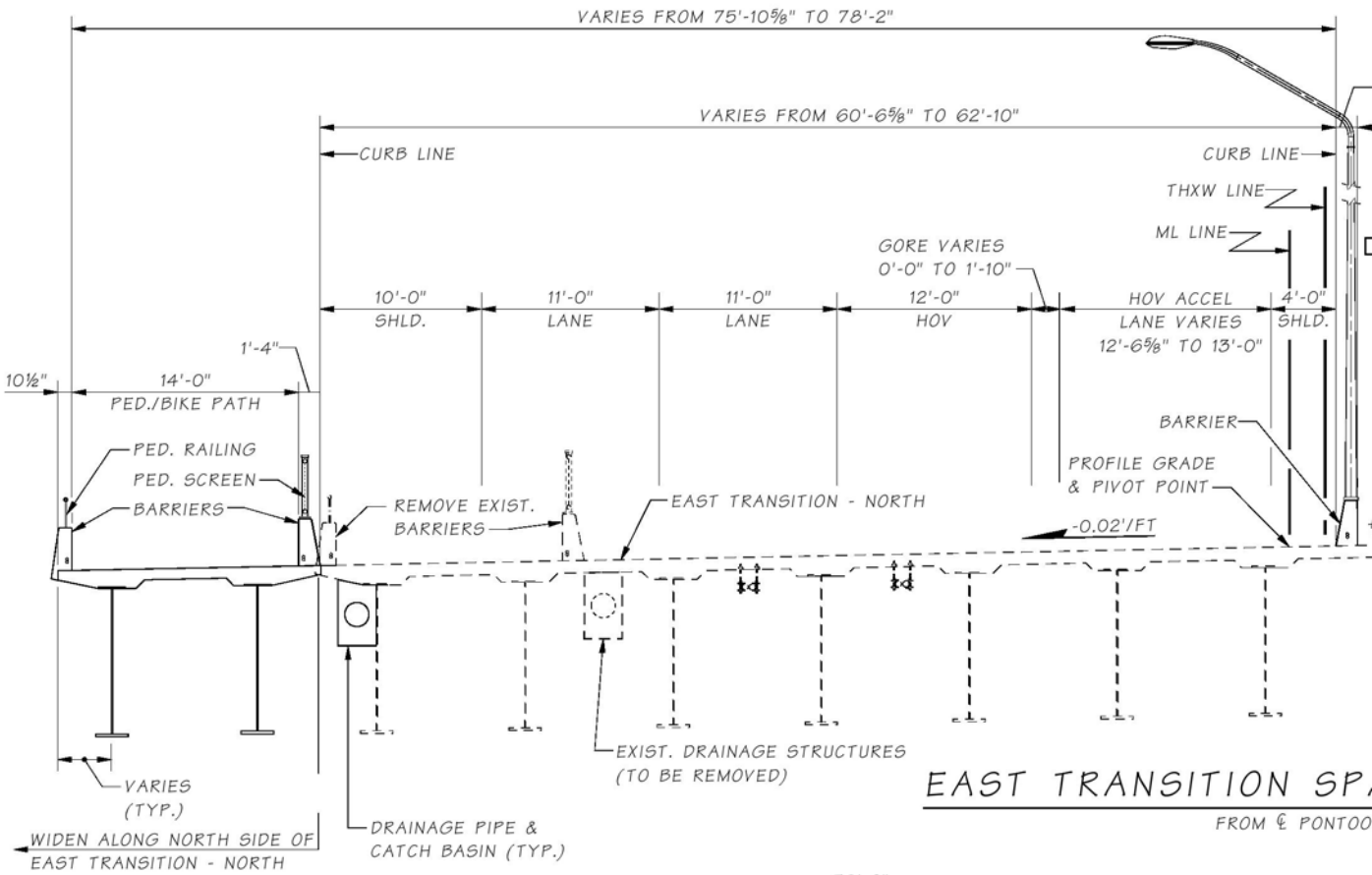
WEST TRANSITION SPANS (

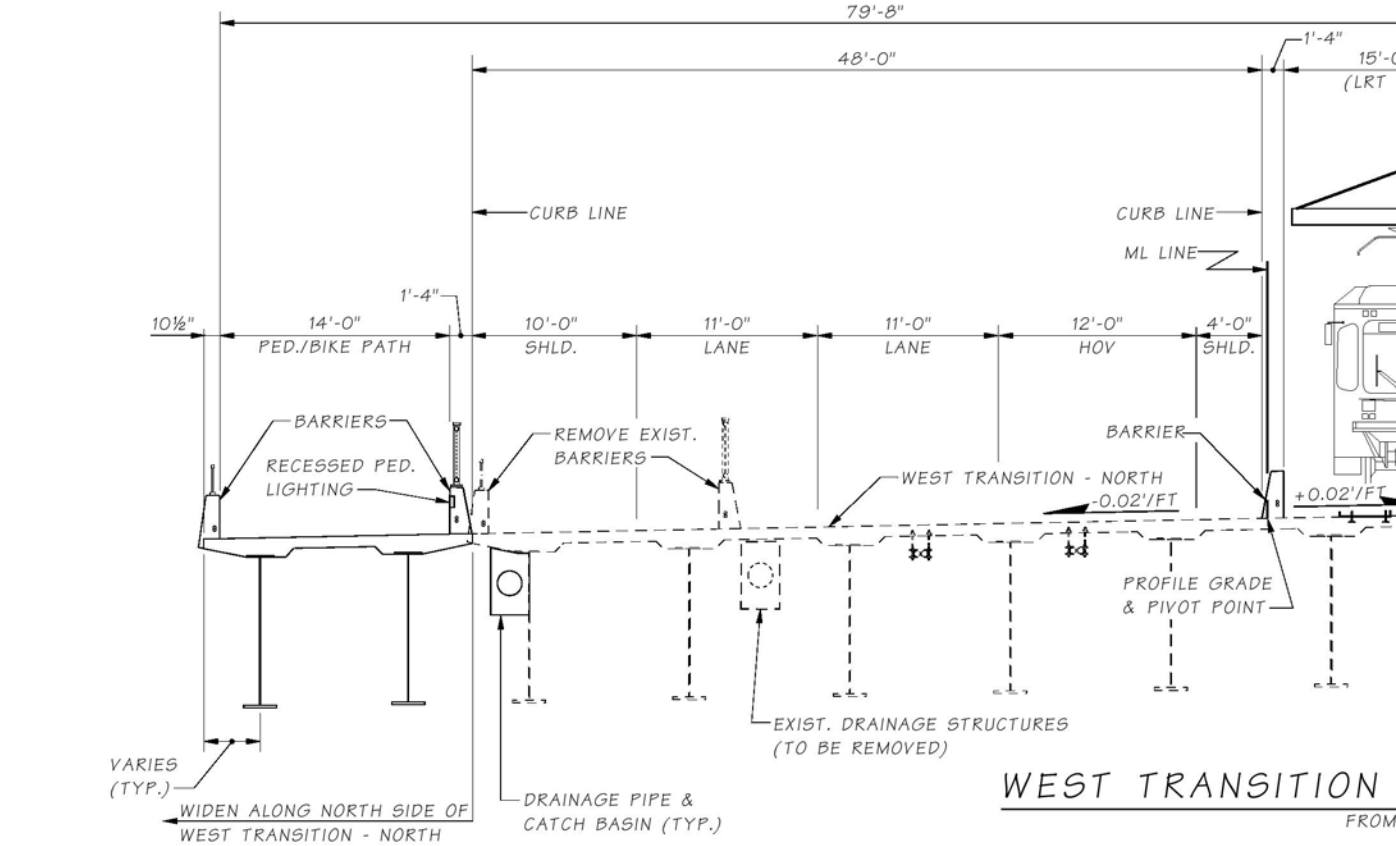
FROM WEST A
SEE 6-LANE SPANS

SR 520 FILE NO. ____ SHEET 16 OF 18

Bridge Design Engr.	Khaleghi, B		M:\W-Team\SR 520 FLOATING BRIDGE\PRELIMINARY PLAN\Window files\TYP SECTIONS 5.WND							
Supervisor	Clarke, PT					REGION NO.	STATE	FED. AID PROJ. NO.	SHEET NO.	TOTAL SHEETS
Designed By						10	WASH.			
Checked By	Aldrich, BS	03/09								
Detailed By	Lemons, T	03/09				JOB NUMBER				
Bridge Engineering										
Bridge Plan By	Olson D	09/09	NEW SHEET	TL						
Architect/Specialist	Kinderman, P		DATE	REVISION	BY	APP'D				

Thu Sep 24 08:25:16 2009





SR 520 FILE NO. ____ SHEET 17 OF 18

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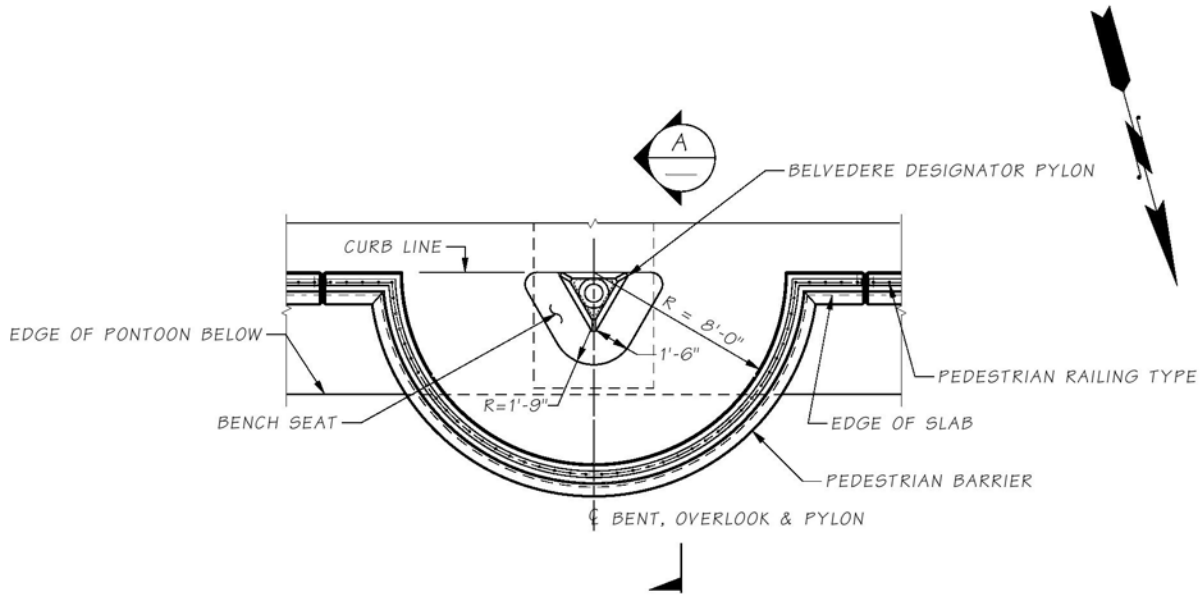
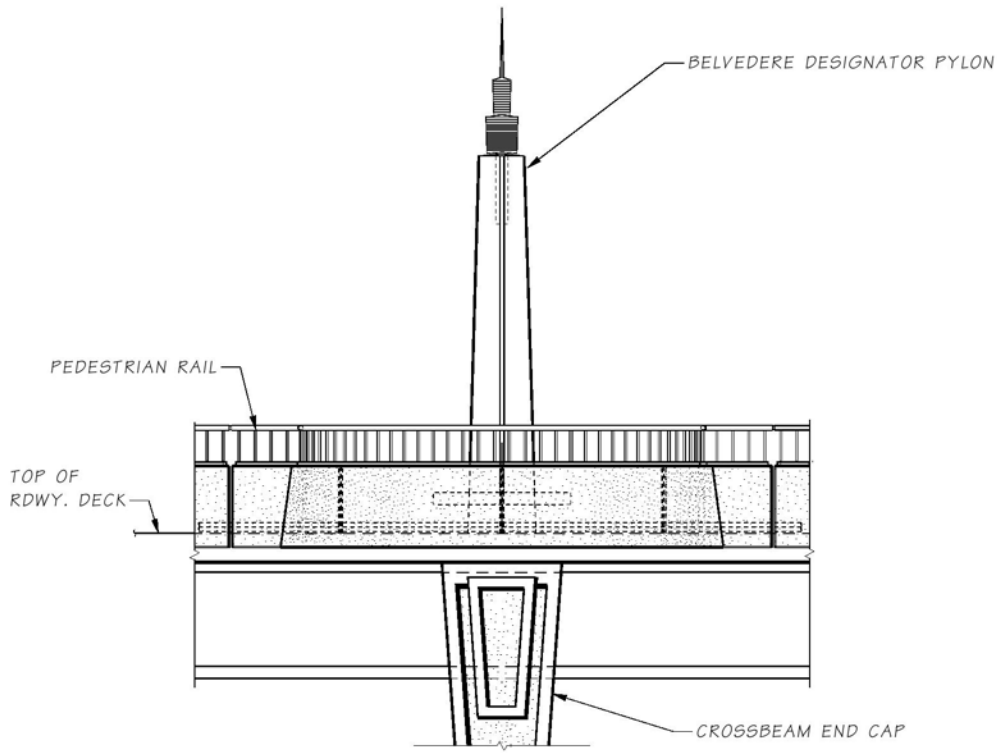
Designed By										
Checked By	Aldrich, BS 03/09									
Detailed By	Lemons, T 03/09					JOB NUMBER				
Bridge Plan By										
Roadway Plan By	Olson, DE	09/09	NEW SHEET	TL						
Architect/Specialist	Kinderman, P	DATE	REVISION	BY	APP'D					

Thu Sep 24 08:25:04 2009



PEDESTRIAN BELVEDERE PLAN



CONCEPTUAL ELEVATION

Bridge Design Engr.	Khaleghi, B		M:\W-Team\SR 520 FLOATING BRIDGE\PRELIMINARY PLAN\Window files\ARCH 1.WND							
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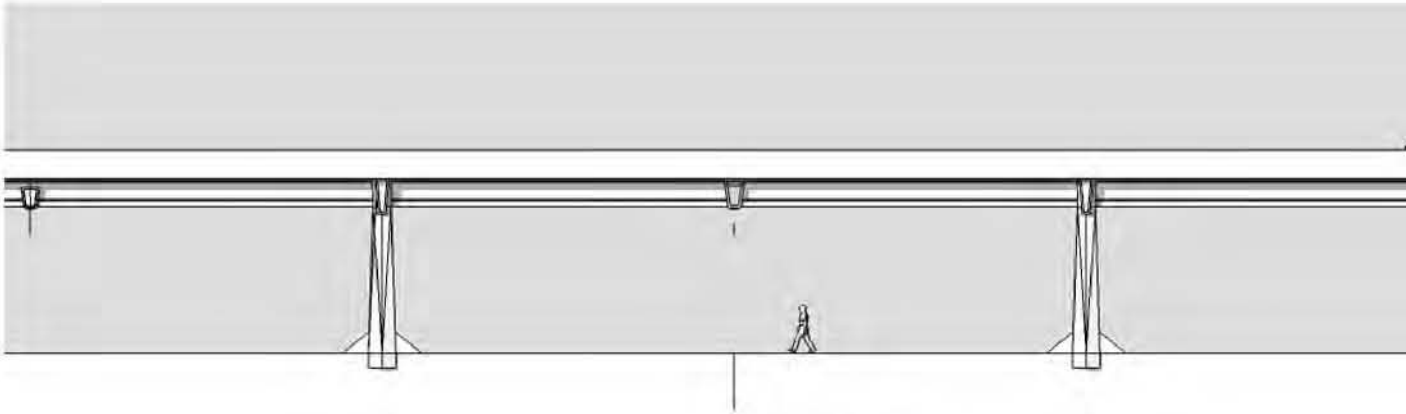
Designed By						10	WASH.			
Checked By	Mizumori, A	03/09								
Detailed By	Puryear, D	03/09				JOB NUMBER				
Bridge Detailing										
Bridge Plan By	Kinderman, P	09/09	NEW SHEET	TL						
Architect/Specialist	Kinderman, P	DATE	REVISION	BY	APP'D					

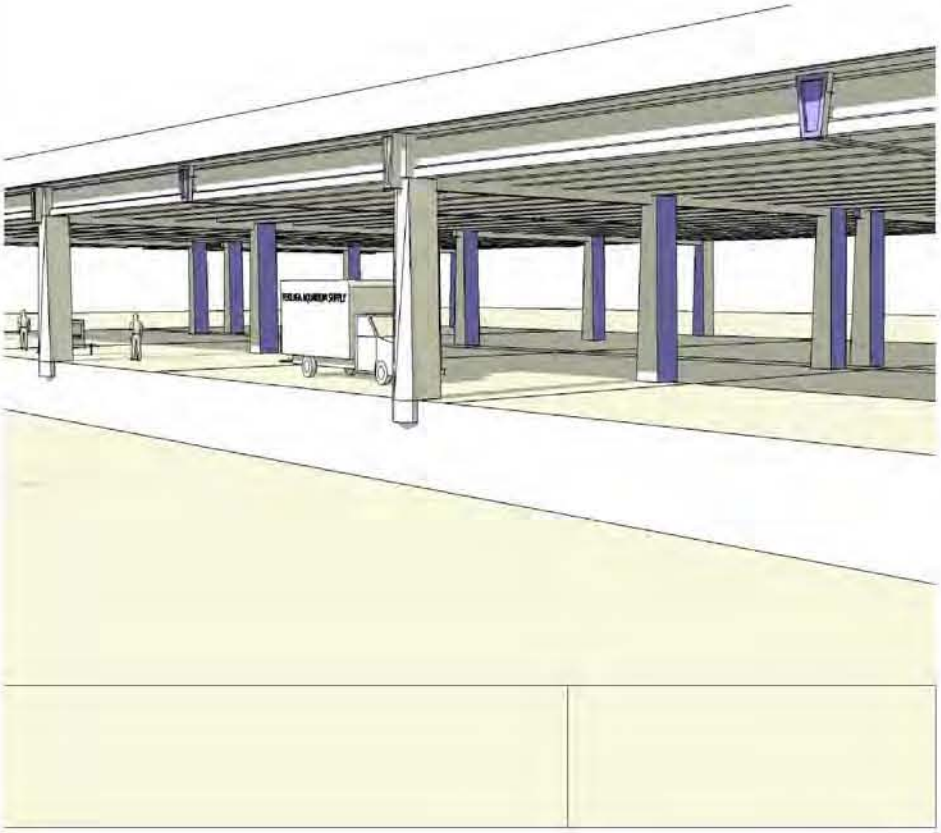
Thu Sep 24 08:21:48 2009

SR 520 FILE NO. ____ SHEET 18 OF 18



ELEVATION

VIEWED FROM THE WATER



PERSPECTIVE

VIEWED FROM THE WATER

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- GRAPHICS REPRESENT DESI
- FINAL DETAILS WILL BE DEV
- COORDINATE ARCHITECTURA

SR 520 FILE NO. ____ SHEET 19 OF 18

Bridge Design Engr.	Khaleghi, B		M:\W-Team\SR 520 FLOATING BRIDGE\PRELIMINARY PLAN\Window files\ARCH 2.WND								
Supervisor	Clarke, PT						REGION NO.	STATE	FED. AID PROJ. NO.	SHEET NO.	TOTAL SHEETS
Designed By							10	WASH.			
Checked By	Mizumori, A	03/09									
Detailed By	Puryear, D	03/09					JOB NUMBER				
Bridge Project Engr.											
Bridge Plan By	Kinderman, P		09/09	NEW SHEET	TL						
Architect/Specialist	Kinderman, P		DATE	REVISION	BY	APP'D					

Thu Sep 24 08:21:59 2009

C-040-167

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 *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

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[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).

"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 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.

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.

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.)

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.

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[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.

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]

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.

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.

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 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.

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

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[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.

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.

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*.

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.

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.

- 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]

[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.

- 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.

- We request that references to views enjoyed by "only a few" of historic resources in the Roanoke Park Historic District and the Portage By 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.

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

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 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.

- 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.

- 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.

- 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.

- **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.

- 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.

- 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.

- **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.

- 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

- 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.

- 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.

- 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.

- 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.)

- 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.

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—itself 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 cumulative effects definition, which is stated in clear language, should be challenged before more damage, perhaps past a tipping point, is done.

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 egregious 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 (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.

- 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.

- 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.

- 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.

- 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.

- 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 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.

- 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.

- 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.

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)

- 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."

- 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.

- 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.

- 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.

- 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 Executive Summary where both kinds of determinations—contributing and individually eligible—should be mentioned.

- 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.

- 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.

- 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?

- 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.

- 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?

- 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 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.

- 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.

- 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.

- 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.

Introduction p. 1

- 1, first bulleted item Include Laurelhurst and the Boating Community among the Seattle project area communities.

- 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.

- 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.

- 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.

- 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?

- 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]."

- 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 successfully withstood studded tires, chains, and freezing and thawing over a goodly amount of time, for 17 years back in 2007.

- 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.

- 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.

- 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.

- 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"?

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.

- 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.

- 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.

- 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 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.

- 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.

- 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.

- 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.

- 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*.)

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 separately. The Roanoke Park land was acquired by the Parks Department in 1908, and the park was established in 1910.

- 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.

- 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.

- 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.

- 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.

- 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.

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.

- 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 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.

- 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.

- 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).

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 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.

- 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.

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.

- 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**.

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*.

- 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.

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

    - 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.

- 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.

- 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.

- [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.

- 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.

- 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.

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

- 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 the significance of the Roanoke Park Historic District on the basis of both Criterion A and Criterion C.

- 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.

- 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.

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?

- 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.

- 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 construction effects findings in this iteration of the *Cultural Resources Discipline Report*. 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)."

- 135, para under "6-Lane Alternative" head, second sentence Says the effects will be thoroughly analyzed before publication of the *FEIS*. Having not had enough review time and meeting time to discuss with WSDOT consultants their analyses of effects before publication of the *SDEIS*, 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 *FEIS*.

- 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 *FEIS* (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).

I-5 and SR 520 Interchange, Construction, Options A, K, and L

- 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."

- 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.

Area Between I-5 and Portage Bay, Construction, Options A, K, and L

Construction—Staging, Options A, K, and L

- 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 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.

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

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, Krontz & 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.

- 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.

- 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.

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.

- 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.

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, Krontz & Wrede, 1961) at 815 East Edgar Street. (**10** contributing resources among which **8** are possibly individually eligible.)

- 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."

    - 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 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, Krontz & 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)

- 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, Krontz & Wrede, 1961) would be adversely affected by the haul route. (**9** contributing and **7** possibly individually eligible resources)

- 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.

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

Construction—Demolition, and (Re)Construction of the three arterial bridges and construction of the two lid sover 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.

- 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,"

- **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.

    - **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.

- **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, 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 Effects[1] 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 Delmar Drive East, although building one there to avoid the closure of Delmar Drive East could be considered.

- 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

[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.