January 25, 2011

Kevin M. Bartoy, RPA Cultural Resources Specialist WSDOT ESO Mega Projects 999 3rd Avenue, Suite 2424 Seattle, WA 98104 bartoyk@wsdot.wa.gov NATIONAL TRUST FOR HISTORIC PRESERVATION°

Western OFFICE

VIA EMAIL

Re:

Alaska Way Viaduct Replacement Project - Request from for Consulting Party Status Under Section 106 of the National Historic Preservation Act

Dear Mr. Bartoy,

The National Trust for Historic Preservation is concerned about proposed impacts to historic properties caused by the Alaska Way Viaduct Replacement Project in Seattle, Washington, and, in particular, its potential effects on the Pioneer Square-Skid Road National Historic District. Of paramount concern are the proposed impacts of the Bored Tunnel, the currently preferred alternative, on both the District as a whole as well as upon individual contributing properties. The Washington State Department of Transportation (WSDOT) has concluded that this alternative has the potential to cause high levels of settlement that could severely damage at least two contributing structures within the District.

We are particularly apprehensive about WSDOT's proposed plan to demolish the Western Building, a 1910 warehouse and contributing structure within the District, located at 619 Western. The Western Building is characterized by a rhythmic pattern of original wood sash windows on its east and west facades and is also currently home to over 100 artists and their studios. We are additionally concerned that, contrary to the views of consulting parties, WSDOT has refused to acknowledge that the loss of this building and other Project impacts would cause an adverse effect upon or a Section 4(f) "use" of the District as a whole. In light of the potential impacts of the Project and the controversy surrounding the review process, the National Trust for Historic Preservation formally requests to participate both as a "consulting party" under Section 106 of the NHPA, pursuant to 36 C.F.R. § 800.2(c)(5), and by receiving and commenting on any documents prepared pursuant to Section 4(f).

## Interests of the National Trust for Historic Preservation

The National Trust for Historic Preservation was chartered by Congress in 1949 as a private nonprofit organization for the purpose of furthering the historic preservation

## **Western Office**

5 Third Street, Suite 707
San Francisco, CA 94103
p 415.947.0692
f 415.947. 0699
E wro@nthp.org
Serving: AK, AZ, CA, HI, ID, NV, OR, WA &
Pacific Island territories

## **National Office**

1785 Massachusetts Avenue, NW Washington, DC 20036
p 202.588.6000
p 202.588.6038
E info@nthp.org
www.PreservationNation.org

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policies of the United States and facilitating public participation in the preservation of our nation's heritage. 16 U.S.C. § 468. With the support of our members nationwide, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government. The Trust has nine regional offices around the country, including a Western Office in San Francisco which is specifically responsive to preservation issues in Washington State.

Because of the National Trust for Historic Preservation's knowledge and concern about historic properties potentially affected by the project, we believe we can provide important information and a valuable perspective as a consulting party under Section 106 and in the review process under Section 4(f). Please include use the following contact in your distribution list for public notices of any meetings, and for the circulation of documents for comment.

> Brian Turner, Esa. Regional Attorney, Western Office 5 Third St., Suite 707 San Francisco, CA 94118 Brian\_Turner@nthp.org

We look forward to participating as the review and consultation process moves forward for the Alaska Way Viaduct Replacement Project. Please feel free to contact me or Mr. Turner at 415-947-0692 if you have any questions or concerns.

Sincerely,

Director, Western Office

CC:

Reid Nelson, Advisory Council on Historic Preservation Charlene Dwin Vaughn, Advisory Council on Historic Preservation Najah Duvall-Gabriel, Advisory Council on Historic Preservation Allyson Brooks, Ph.D. Washington State Historic Preservation Officer Karen Gordon, City of Seattle Historic Preservation Officer Chris Moore, Washington Trust for Historic Preservation Eugenia Woo, Historic Seattle