



STATE OF WASHINGTON

**DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION**

*1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501  
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343  
(360) 586-3065 • Fax Number (360) 586-3067 • Website: [www.dahp.wa.gov](http://www.dahp.wa.gov)*

August 17, 2010

Mr. Kevin Bartoy  
Cultural Resources Specialist  
WSDOT ESO Mega Projects  
999 3rd Avenue, Suite 2424  
Seattle, WA 98104-3850

In future correspondence please refer to:

Log: 121602-08-FHWA  
Property: SR 520 Corridor Trans-Lake Washington, Bridge Replacement and HOV  
Re: Archaeology - APE Concur

Dear Mr. Bartoy:

We have reviewed the materials forwarded to our office for the above referenced project. Thank you for your description of the revised area of potential effect (APE) that now incorporated property at the Ports of Olympia and Tacoma. We concur with the definition of the revised APE. Since there are no accompanying construction drawings, we presume that the APE boundaries reflect the maximum footprint of the proposed construction.

We look forward to the results of your cultural resources survey efforts, your consultation with the concerned tribes, and receiving the survey report. We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4) and the survey report when it is available.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised.

Please note that DAHP requires that all historic property inventory and archaeological site forms be provided to our office electronically. If you have not registered for a copy of the database, please log onto our website at [www.dahp.wa.gov](http://www.dahp.wa.gov) and go to the Survey/Inventory page for more information and a registration form. To assist you in conducting a survey, DAHP has developed a set of cultural resource reporting guidelines. You can obtain a copy of these guidelines from our website. Finally, please note that effective Nov. 2, 2009, DAHP requires that all cultural resource reports be submitted in PDF format on a labeled CD along with an unbound paper copy. For further information please go to [http://www.dahp.wa.gov/documents/CR\\_ReportPDF\\_Requirement.pdf](http://www.dahp.wa.gov/documents/CR_ReportPDF_Requirement.pdf).



Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,



Matthew Sterner, M.A.  
Transportation Archaeologist  
(360) 586-3082  
matthew.sterner@dahp.wa.gov

**Copies of the following letter were sent to the following individuals:**

<b>Date</b>	<b>Subject</b>	<b>From</b>	<b>To</b>	<b>Corresp. Ref. No.</b>
8/18/2010	SR 520 Bridge Replacement and HOV Project, Seattle, King County, DOEs for Potential Section 6(f) Replacement Properties	Lori Durio SR 520 Cultural Resources Program Lead WSDOT	Allyson Brooks Department of Archaeology and Historic Preservation 1063 S Capitol Way, Suite 106 Olympia, WA 98504-8343	LTR #1584





**Washington State  
Department of Transportation**  
**Paula J. Hammond, P.E.**  
Secretary of Transportation

**Engineering and Regional Operations**  
**SR 520 Bridge Replacement and HOV Program**  
600 Stewart Street, Suite 520  
Seattle, WA 98101

Phone: 206-770-3500  
Fax: 206-770-3569  
TTY: 1-800-833-6388  
[www.wsdot.wa.gov/Projects/SR520Bridge](http://www.wsdot.wa.gov/Projects/SR520Bridge)

August 18, 2010

Y-8393 BH  
LTR #1584

Dr. Allyson Brooks  
State Historic Preservation Officer  
Department of Archaeology and Historic Preservation  
PO Box 48343  
Olympia, Washington 98504-8343

**DAHP Log #: 121602-08-FHWA**  
**Property: SR 520: I-5 to Medina Bridge Replacement and HOV Project**  
**Re: DOEs for Potential Section 6(f) Replacement Properties**

Dear Dr. Brooks:

On behalf of the Federal Highway Administration (FHWA), pursuant to 36 CFR 800.2(c)(1), the Washington State Department of Transportation (WSDOT) is continuing consultation regarding the SR 520: I-5 to Medina Bridge Replacement and HOV Project. This letter provides Determinations of Eligibility (DOEs) in the form of six Historic Property Inventory (HPI) forms for buildings located at potential Section 6(f) replacement properties. WSDOT has determined that one of these buildings, known as the Bryant Building, is eligible for listing in the National Register of Historic Places (NRHP). WSDOT has also determined that the five other buildings are not eligible for listing in the NRHP. WSDOT respectfully requests your review and concurrence with these determinations. We look forward to your concurrence on our DOEs by no later than September 16, 2010.

This submittal includes a CD containing the exported database files and photo folders for the six HPI forms, as well as the Cultural Resources Report for Section 6(f) Environmental Evaluation. If you have any questions, please do not hesitate to contact me at 206.521.5552, email [durio1@consultant.wsdot.wa.gov](mailto:durio1@consultant.wsdot.wa.gov) or Kevin Bartoy at 206.521.5628, email [bartoyk@wsdot.wa.gov](mailto:bartoyk@wsdot.wa.gov).

Sincerely,

*Lori Durio on behalf of Lori Durio*

Lori Durio  
SR 520 Cultural Resources Program Lead

Attachment - CD-ROM with Database Files for Historic Property Inventory Forms and Cultural Resources Report for Section 6(f) Environmental Evaluation

Cc: Matthew Sterner, DAHP, w/o attachments  
Randy Everett, Federal Highway Administration, w/o attachments  
Allison Hanson, WSDOT, w/o attachments  
Kevin Bartoy, WSDOT, w/o attachments  
Scott Williams, WSDOT, w/o attachments

**Copies of the following letter were sent to the following individuals:**

<b>Date</b>	<b>Subject</b>	<b>From</b>	<b>To</b>	<b>Corresp. Ref. No.</b>
8/19/2010	SR 520 Bridge Replacement and HOV Project, Seattle, King County, DOEs for Potential Haul Route Properties	Lori Durio SR 520 Cultural Resources Program Lead WSDOT	Allyson Brooks Department of Archaeology and Historic Preservation 1063 S Capitol Way, Suite 106 Olympia, WA 98504-8343	None





Washington State  
Department of Transportation

## SR 520 Bridge Replacement and HOV Program

I-5 to Medina: Bridge Replacement and HOV Project



August 19, 2010

Dr. Allyson Brooks  
State Historic Preservation Officer  
Department of Archaeology and Historic Preservation  
PO Box 48343  
Olympia, Washington 98504-8343

**DAHP Log #: 121602-08-FHWA**  
**Property: SR 520: I-5 to Medina Bridge Replacement and HOV Project**  
**Re: DOEs for Potential Haul Route Properties**

Dear Dr. Brooks:

On behalf of the Federal Highway Administration (FHWA), pursuant to 36 CFR 800.2(c)(1), the Washington State Department of Transportation (WSDOT) is continuing consultation regarding the SR 520: I-5 to Medina Bridge Replacement and HOV Project. This letter provides Determinations of Eligibility (DOEs) in the form of Historic Property Inventory (HPI) forms for buildings located along potential haul routes. There are a total of 355 HPI forms. WSDOT has determined that 96 of these buildings are eligible for listing in the National Register of Historic Places (NRHP), either individually or as contributing elements to the eligible Montlake historic district. WSDOT has also determined that 259 properties are not eligible for listing in the NRHP. Please see the attached for a listing by address of the surveyed properties. WSDOT respectfully requests your review and concurrence with these determinations. As initially agreed to at a meeting with Megan White, Allison Hanson, and Randy Everett held on May 25, 2010, and further refined on a call between Michael Houser and Connie Gray, we would appreciate an expedited review of the HPI forms, and hope to receive concurrence on our DOEs by September 9.

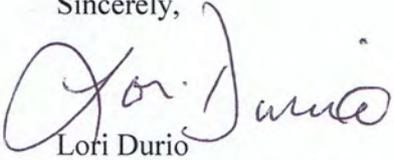
This submittal was done electronically using the new WISAARD HPI system, with the assistance of Megan Duvall, on August 19, 2010. In working with the new system, we discovered some glitches that you may see reflected in our forms. We have been working with Ms. Duvall and she is aware of these issues, but we have listed them below for your information.

- The fields "Changes to Plan" and "Changes to Interior" do not save correctly and appear to be incorrectly linked to other fields.
- The database wasn't retaining the 'address suffix' on the location tab. This appears to have been fixed.
- The address suffix and suffix direction are also not showing up in the "address" column of the inventory tab for the survey.
- Location data is missing from the PDF reports.
- There was a problem with the display of the markers on the location map. This appears to have been fixed.

- The 'delete' record button generally does not work. Therefore, there are a couple records still in the database that need deleting.
- There was a period of time when new records were created, but the entered data wasn't being saved. This led to a number of blank records, all of which I believe have been corrected.

If you have any questions, please do not hesitate to contact me at 206.521.5552, email [duriol@consultant.wsdot.wa.gov](mailto:duriol@consultant.wsdot.wa.gov) or Kevin Bartoy at 206.521.5628, email [bartoyk@wsdot.wa.gov](mailto:bartoyk@wsdot.wa.gov).

Sincerely,



Lori Durio  
Cultural Resources Program Lead  
SR 520 Program

Attachment – List of surveyed properties

Cc: Matthew Sterner, DAHP, w/o attachments  
Randy Everett, Federal Highway Administration, w/o attachments  
Allison Hanson, WSDOT, w/o attachments  
Kevin Bartoy, WSDOT, w/o attachments  
Scott Williams, WSDOT, w/o attachments



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September 16, 2010

Ms. Lori Durio  
SR 520 Bridge Replacement and HOV Program  
600 Stewart Street, Suite 520  
Seattle, WA 98101

In future correspondence please refer to:

Log: 121602-08-FHWA

Property: SR 520 Corridor Trans-Lake Washington, Bridge Replacement and HOV

Re: Determined Eligible

Dear Ms. Durio:

Thank you for contacting our office. I am contacting you on behalf of Michael Houser, State Architectural Historian, who has reviewed the historic property inventory (HPI) forms that you submitted for review as part of your Section 6(f) study. Mr. Houser does not concur with your determinations of eligibility for the resources submitted as part of this study.

We concur with your determination that the Bryant Building is eligible for listing in the National Register of Historic Properties (NRHP). We do not concur, however, that the properties at 10034, 10036, and 10038 Rainier Ave South are not eligible for listing in the NRHP. We concur that the remaining properties identified in your report can be considered as not eligible for listing in the NRHP. We look forward to further consultation regarding your determination of effect.

I would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4) and the survey report when it is available.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,

Matthew Sterner, M.A.  
Transportation Archaeologist  
(360) 586-3082  
[matthew.sterner@dahp.wa.gov](mailto:matthew.sterner@dahp.wa.gov)





**Copies of the following letter were sent to the following individuals:**

<b>Date</b>	<b>Subject</b>	<b>From</b>	<b>To</b>	<b>Corresp. Ref. No.</b>
9/20/2010	SR 520 Bridge Replacement and HOV Project, Seattle, King County, Request for Concurrence with Eligibility Determination for Foster Island Traditional Cultural Property (TCP)	Kevin Bartoy Cultural Resources Specialist WSDOT	Allyson Brooks Department of Archaeology and Historic Preservation 1063 S Capitol Way, Suite 106 Olympia, WA 98504-8343	None





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*(360) 586-3065 • Fax Number (360) 586-3067 • Website: [www.dahp.wa.gov](http://www.dahp.wa.gov)*

November 10, 2010

Ms. Lori Durio Price  
Cultural Resource Program Lead  
SR 520 Program  
600 Stewart Street, Suite 520  
Seattle, WA 98101

In future correspondence please refer to:

Log: 092910-07-FHWA  
Property: SR 520 I-5 to Medina: Haul Routes  
Re: Determined Eligible

Dear Ms. Durio Price:

Thank you for contacting our office. I have reviewed the materials you provided to our office for the proposed haul routes related to the SR 520 project. My understanding the exact haul routes have changed slightly and are still subject to additional changes. Please be advised that if the routes change, additional survey will need to be completed in order to evaluate the eligibility of resources along the routes and potential impacts to these properties. Additionally I should state that since no survey maps were provided, I can not be certain that all resources along the routes which are 50+ years old or older have been surveyed. I'm assuming this is the case... but I'm not sure.

My determinations can be found on the attached spreadsheets for all 355 resources. The properties that I have determined eligible are highlighted in yellow. I have determined that 123 of the surveyed properties are eligible for the National Register of Historic Places. Many contribute to a listed or potential historic district, while others may be individually eligible.

Please note that the total number of resources varies from your eligibility calls. Some resources, which were determined eligible by your consultants, I have determined not eligible and vice versa. I have noted several inconsistencies in the inventory forms which call a property not eligible, yet your spreadsheet has the resource listed as eligible. This may have been typos. Other resources we may have a difference in opinion on eligibility. For instance, the area west of I-5 (the Eastlake Neighborhood) in my determination does have enough integrity to constitute a small National Register district (albeit with jagged boundaries). Also

you should be aware that Seattle has an National Register MPD on "Apartment Buildings: 1900-1957", which outlines registration requirements for listing of these resources (hence some of the apartments in the survey may or may not qualify for listing under the MPD).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Houser", with a long horizontal flourish extending to the right.

**Michael Houser**  
*State Architectural Historian*  
(360) 586-3076  
michael.houser@dahp.wa.gov

## Surveyed Properties

### Located Adjacent to Potential Haul Routes

Property Address	Zip Code	Year Built	NRHP Eligibility	Parcel Number	SHPO Determination
1000 E Allison St	98102	1927	Individually Eligible, Criterion C	1959702995	ELIGIBLE
1000 NE 45th St	98105	1970	Not Eligible	7733600155	NOT ELIGIBLE
1001 NE Boat St	98102	1957	Not Eligible	4088801095	NOT ELIGIBLE
1114 E Shelby St	98102	1953	Not Eligible	1962200400	NOT ELIGIBLE
1116 E Hamlin St	98102	1923	Not Eligible	1959701940	NOT ELIGIBLE
1119 E Hamlin St	98102	1919	Not Eligible	3720800085	NOT ELIGIBLE
1208 E Shelby St	98102	1909	Not Eligible	1959702195	NOT ELIGIBLE
1330 E Interlaken Blvd	98102	1951	Not Eligible	1952200280	NOT ELIGIBLE
1334 E Interlaken Blvd	98102	1919	Not Eligible	1952200285	NOT ELIGIBLE
1340 E Interlaken Blvd	98102	1970	Not Eligible	1952200295	NOT ELIGIBLE
1344 E Interlaken Blvd	98102	1912	Not Eligible	1952200300	NOT ELIGIBLE
1348 E Interlaken Blvd	98102	1909	Not Eligible	1952200305	NOT ELIGIBLE
1404 E Lynn St	98112	1963	Not Eligible	1952200496	ELIGIBLE
1410 NE Campus Pkwy	98105	1970	Individually Eligible, Criterion C	1142002395	ELIGIBLE
1414 E Lynn St	98112	1962	Not Eligible	1952200495	NOT ELIGIBLE
1418 E Lynn St	98112	1953	Not Eligible	1952200490	ELIGIBLE
1500 E McGraw St	98112	1938	Contributing to the Montlake Historic Dist	6788202365	ELIGIBLE
1506 E McGraw St	98112	1939	Contributing to the Montlake Historic Dist	6788202370	NOT ELIGIBLE
1551 - 1555 Lakeview Blvd E	98102	1949	Not Eligible	2025049128	NOT ELIGIBLE
1602 E Lynn St	98102	1925	Contributing to the Montlake Historic Dist	6788202110	ELIGIBLE
1603 Lakeview Blvd E	98102	1930	Not Eligible	# 0188000030	NOT ELIGIBLE
1606 Lakeview Blvd E	98102	1916	Not Eligible	# 0188000085	ELIGIBLE
1608 E Lynn St	98102	1929	Contributing to the Montlake Historic Dist	6788202115	ELIGIBLE
1610 Lakeview Blvd E	98102	1954	Not Eligible	# 0188000080	NOT ELIGIBLE
1611 E Lynn St	98112	1949	Contributing to the Montlake Historic Dist	1880000025	NOT ELIGIBLE
1612 E Lynn St	98102	1929	Contributing to the Montlake Historic Dist	6788202116	ELIGIBLE
1614 E Lynn St	98112	1928	Contributing to the Montlake Historic Dist	6788202130	ELIGIBLE
1618 E Lynn St	98112	1928	Contributing to the Montlake Historic Dist	6788202135	ELIGIBLE
1618 Lakeview Blvd E	98102	1919	Individually Eligible, Criterion C	# 0188000070	ELIGIBLE

1619 E Lynn St	98112	1947	Contributing to the Montlake Historic Dist	1880000020	ELIGIBLE
1622 E Lynn St	98112	1928	Contributing to the Montlake Historic Dist	6788202136	ELIGIBLE
1626 E Lynn St	98112	1928	Contributing to the Montlake Historic Dist	6788202150	ELIGIBLE
1627 E Lynn St	98112	1947	Contributing to the Montlake Historic Dist	1880000015	ELIGIBLE
1630 E Lynn St	98112	1928	Contributing to the Montlake Historic Dist	6788202155	ELIGIBLE
1633 E Lynn St	98112	1947	Contributing to the Montlake Historic Dist	1880000010	ELIGIBLE
1802 E Lynn St	98112	1930	Contributing to the Montlake Historic Dist	6788201970	ELIGIBLE
1805 E Lynn St	98112	1947	Contributing to the Montlake Historic Dist	1880000005	ELIGIBLE
1806 E Lynn St	98112	1930	Contributing to the Montlake Historic Dist	6788201971	ELIGIBLE
1810 E Lynn St	98112	1929	Contributing to the Montlake Historic Dist	6788201980	ELIGIBLE
1811 E Lynn St	98112	1950	Contributing to the Montlake Historic Dist	2125049131	ELIGIBLE
1814 E Lynn St	98112	1930	Contributing to the Montlake Historic Dist	6788201990	ELIGIBLE
1819 E Lynn St	98112	1951	Contributing to the Montlake Historic Dist	2125049133	ELIGIBLE
1820 E Lynn St	98112	1938	Contributing to the Montlake Historic Dist	6788201995	ELIGIBLE
1820 Lakeview Blvd E	98102	1923	Not Eligible	9390700100	NOT ELIGIBLE
1824 Lakeview Blvd E	98102	1923	Not Eligible	9390700095	NOT ELIGIBLE
1825 E Lynn St	98112	1951	Not Eligible	2125049132	NOT ELIGIBLE
1826 E Lynn St	98112	1952	Not Eligible	6788202000	NOT ELIGIBLE
1901 E Lynn St	98112	1951	Not Eligible	2125049122	NOT ELIGIBLE
1902 E Lynn St	98112	1924	Contributing to the Montlake Historic Dist	6788201740	ELIGIBLE
1902 E McGraw St	98112	1921	Contributing to the Montlake Historic Dist	6788200642	ELIGIBLE
1903 E Calhoun St	98112	1924	Contributing to the Montlake Historic Dist	6788200595	ELIGIBLE
1907 E Miller St	98112	1925	Contributing to the Montlake Historic Dist	6788200485	ELIGIBLE
1918 E Miller St	98112	1928	Contributing to the Montlake Historic Dist	8805900570	ELIGIBLE
1927 Franklin Pl E	98102	1908	Not Eligible	4086300050	NOT ELIGIBLE
1963 21st Ave E	98112	1927	Contributing to the Montlake Historic Dist	2158900130	ELIGIBLE
2003 Boylston Ave E	98102	1925	Individually Eligible, Criterion C	2902200006	ELIGIBLE
2007 Boylston Ave E	98102	1965	Not Eligible	2902200010	ELIGIBLE
2015 Boylston Ave E	98102	1908	Not Eligible	2902200016	NOT ELIGIBLE
2017 Boylston Ave E	98102	1908	Not Eligible	2902200015	NOT ELIGIBLE
2023 Boylston Ave E	98102	1910	Not Eligible	2902200021	NOT ELIGIBLE
2025 Boylston Ave E	98102	1915	Not Eligible	2902200025	ELIGIBLE
2030 19th Ave E	98112	1949	Individually Eligible, Criterion C	2158900298	ELIGIBLE
2031 Boylston Ave E	98102	1921	Not Eligible	2902200026	NOT ELIGIBLE

2033 Boylston Ave E	98102	1921	Not Eligible	2902200031	NOT ELIGIBLE
2037 Boylston Ave E	98102	1929	Not Eligible	2902200035	NOT ELIGIBLE
2100 Boyer Ave E	98112	1962	Individually Eligible, Criteria C	1880000055	ELIGIBLE
220 E Hamlin St	98102	1949	Not Eligible	1959701415	ELIGIBLE
2203 Boylston Ave E	98102	1925	Not Eligible	2902200650	ELIGIBLE
2215 Boylston Ave E	98102	1909	Not Eligible	2902200660	NOT ELIGIBLE
2219 Boylston Ave E	98102	1915	Not Eligible	2902200665	NOT ELIGIBLE
222 E Hamlin St	98102	1928	Not Eligible	1959701420	ELIGIBLE
2222 16th Ave E	98112	1969	Individually Eligible, Criterion C	1029000020	ELIGIBLE
2227 Boylston Ave E	98102	1915	Not Eligible	2902200670	ELIGIBLE
2231 Boylston Ave E	98102	1909	Not Eligible	2902200671	ELIGIBLE
2235 Boylston Ave E	98102	1909	Not Eligible	2902200676	ELIGIBLE
2239 Boylston Ave E	98102	1900	Not Eligible	2902200680	ELIGIBLE
2301 Delmar Dr E	98102	1937	Not Eligible	1952200315	ELIGIBLE
2302 Boyer Ave E	98112	1929	Contributing to the Montlake Historic Dist	6788203060	ELIGIBLE
2303 19th Ave E	98112	1915	Contributing to the Montlake Historic Dist	6788202011	ELIGIBLE
2307 19th Ave E	98112	1915	Contributing to the Montlake Historic Dist	6788202010	ELIGIBLE
2308 Boyer Ave E	98112	1928	Contributing to the Montlake Historic Dist	6788203026	ELIGIBLE
2309 Boyer Ave E	98112	1930	Contributing to the Montlake Historic Dist	6788203046	ELIGIBLE
2311 14th Ave E	98112	1929	Not Eligible	1952200400	NOT ELIGIBLE
2312 19th Ave E	98112	1930	Contributing to the Montlake Historic Dist	6788201681	ELIGIBLE
2312 Delmar Dr E	98102	1963	Not Eligible	1952200405	NOT ELIGIBLE
2315 14th Ave E	98112	1963	Not Eligible	1952200395	NOT ELIGIBLE
2315 19th Ave E	98112	1928	Contributing to the Montlake Historic Dist	6788201966	ELIGIBLE
2315 Boyer Ave E	98112	1920	Contributing to the Montlake Historic Dist	6788203045	ELIGIBLE
2315 Boylston Ave E	98102	1909	Not Eligible	2902200740	ELIGIBLE
2316 Boyer Ave E	98112	1928	Contributing to the Montlake Historic Dist	6788203020	ELIGIBLE
2318 19th Ave E	98112	1922	Contributing to the Montlake Historic Dist	6788201680	ELIGIBLE
2319 Boyer Ave E	98112	1920	Contributing to the Montlake Historic Dist	6788203001	NOT ELIGIBLE
2319 Boylston Ave E	98102	1904	Not Eligible	2902200741	NOT ELIGIBLE
2320 Delmar Dr E	98102	1955	Not Eligible	1952200410	NOT ELIGIBLE
2323 19th Ave E	98112	1928	Not Eligible	6788201965	NOT ELIGIBLE
2323 Boylston Ave E	98102	1904	Not Eligible	2902200746	NOT ELIGIBLE
2324 14th Ave E	98112	1948	Not Eligible	1952200485	NOT ELIGIBLE

2324 Boyer Ave E	98112	1928	Contributing to the Montlake Historic Dist	6788203015	ELIGIBLE
2325 Boyer Ave E	98112	1919	Not Eligible	6788203000	NOT ELIGIBLE
2327 Boylston Ave E	98102	1905	Not Eligible	2902200751	NOT ELIGIBLE
2328 Delmar Dr E	98102	1936	Not Eligible	1952200385	NOT ELIGIBLE
2330 14th Ave E	98112	1929	Individually Eligible, Criterion C	195220480	ELIGIBLE
2333 Boylston Ave E	98102	1906	Not Eligible	2902200750	NOT ELIGIBLE
2335 Boylston Ave E	98102	1906	Not Eligible	2902200756	NOT ELIGIBLE
2339 Boylston Ave E	98102	1907	Not Eligible	2902200761	NOT ELIGIBLE
2340 14th Ave E	98112	1949	Individually Eligible, Criterion C	1952200475	NOT ELIGIBLE
2340 Delmar Dr E	98102	1928	Not Eligible	1952200425	ELIGIBLE
2344 Delmar Dr E	98102	1928	Not Eligible	1952200430	NOT ELIGIBLE
2349 Boylston Ave E	98102	1916	Not Eligible	2902200771	NOT ELIGIBLE
2349 Delmar Dr E	98102	1952	Not Eligible	1952200275	NOT ELIGIBLE
2350 Boyer Ave E	98112	1939	Not Eligible	1952200120	NOT ELIGIBLE
2351 Boylston Ave E	98102	1916	Not Eligible	2902200770	NOT ELIGIBLE
2356 Boyer Ave E	98112	1958	Not Eligible	1952200115	NOT ELIGIBLE
2359 Boyer Ave E	98112	1947	Not Eligible	1952200486	NOT ELIGIBLE
2359 Boylston Ave E	98102	1908	Individually Eligible, Criterion C	2902200776	ELIGIBLE
2362 Boyer Ave E	98112	1910	Individually Eligible, Criterion C	1952200110	NOT ELIGIBLE
2366 Boyer Ave E	98112	1906	Individually Eligible, Criterion C	1952200105	ELIGIBLE
2400 Boyer Ave E	98112	1956	Individually Eligible, Criterion C	1952200090	ELIGIBLE
2401 19th Ave E	98112	1965	Individually Eligible, Criterion C	6788201910	ELIGIBLE
2401 Boylston Ave E	98102	1926	Not Eligible	2902200780	ELIGIBLE
2401 E McGraw St	98112	1958	Not Eligible	6788201335	NOT ELIGIBLE
2402 Delmar Dr E	98102	1953	Not Eligible	1952200210	NOT ELIGIBLE
2403 Boyer Ave E	98112	1951	Individually Eligible, Criterion C	1952200365	NOT ELIGIBLE
2405 Boylston Ave E	98102	1926	Not Eligible	2902200781	NOT ELIGIBLE
2407 Boylston Ave E	98102	1914	Individually Eligible, Criterion C	2902200786	ELIGIBLE
2408 Delmar Dr E	98102	1953	Not Eligible	1952200220	NOT ELIGIBLE
2409 Boyer Ave E	98112	1951	Not Eligible	1952200360	NOT ELIGIBLE
2410 Boyer Ave E	98112	1966	Not Eligible	1952200066	NOT ELIGIBLE
2411 19th Ave E	98112	1924	Not Eligible	6788201861	NOT ELIGIBLE
2411 Boylston Ave E	98102	1914	Not Eligible	2902200785	ELIGIBLE
2413 Boylston Ave E	98102	1965	Not Eligible	2902200790	NOT ELIGIBLE

2415 19th Ave E	98112	1924	Contributing to the Montlake Historic District	6788201860	ELIGIBLE
2415 Boyer Ave E	98102	1912	Not Eligible	1952200350	ELIGIBLE
2415 Everett Ave E	98102	1928	Not Eligible	1952200205	NOT ELIGIBLE
2418 Delmar Dr E	98102	1927	Not Eligible	1952200225	NOT ELIGIBLE
2419 Everett Ave E	98102	1927	Not Eligible	1952200201	NOT ELIGIBLE
2423 Everett Ave E	98102	1927	Not Eligible	1952200200	NOT ELIGIBLE
2424 Boyer Ave E	98112	1926	Individually Eligible, Criterion C	195220067	ELIGIBLE
2428 Boyer Ave E	98112	1926	Not Eligible	1952200065	ELIGIBLE
2430 Boyer Ave E	98112	1925	Contributing to the Montlake Historic District	1952200060	ELIGIBLE
2432 Delmar Dr E	98102	1910	Not Eligible	1952200240	ELIGIBLE
2436 Delmar Dr E	98102	1951	Not Eligible	1952200245	NOT ELIGIBLE
2440 Delmar Dr E	98102	1908	Not Eligible	8726900000	NOT ELIGIBLE
2448 Delmar Dr E	98102	1919	Not Eligible	1952200255	NOT ELIGIBLE
2454 19th Ave E	98112	1926	Contributing to the Montlake Historic District	6788200516	ELIGIBLE
2456 19th Ave E	98112	1927	Contributing to the Montlake Historic District	6788200515	ELIGIBLE
2462 W Montlake Pl E	98112	1925	Contributing to the Montlake Historic District	6788200485	ELIGIBLE
2501 Boyer Ave E	98102	1938	Not Eligible	1952200195	NOT ELIGIBLE
2505 Boyer Ave E	98102	1909	Not Eligible	1952200190	NOT ELIGIBLE
2509 Boyer Ave E	98102	1949	Not Eligible	1952200185	NOT ELIGIBLE
2510 Boyer Ave E	98102	1953	Not Eligible	1952200046	NOT ELIGIBLE
2510 W Montlake Pl E	98112	1930	Contributing to the Montlake Historic District	8805900565	ELIGIBLE
2514 Boyer Ave E	98102	1954	Not Eligible	1952200041	NOT ELIGIBLE
2519 20th Ave E	98112	1930	Contributing to the Montlake Historic District	8805900400	ELIGIBLE
2520 W Montlake Pl E	98112	1930	Contributing to the Montlake Historic District	8805900525	ELIGIBLE
2525 Boyer Ave E	98102	1958	Not Eligible	1952200170	NOT ELIGIBLE
2543 Boyer Ave E	98102	1909	Not Eligible	1952200155	NOT ELIGIBLE
2552 20th Ave E	98112	1937	Not Eligible	8805900530	ELIGIBLE
2565 22nd Ave E	98112	1962	Not Eligible	8805900390	NOT ELIGIBLE
2607 Boyer Ave E	98102	1924	Not Eligible	1959700650	NOT ELIGIBLE
2613 Boyer Ave E	98102	1941	Not Eligible	1959700655	NOT ELIGIBLE
2617 Boyer Ave E	98102	1924	Individually Eligible, Criterion C	1959700660	ELIGIBLE
2623 Boyer Ave E	98102	1922	Not Eligible	1959700665	NOT ELIGIBLE
2623 Boylston Ave E	98102	1911	Not Eligible	1959700250	ELIGIBLE
2625 Boyer Ave E	98102	1923	Not Eligible	1959700670	NOT ELIGIBLE

2625 Boylston Ave E	98102	1912	Not Eligible	1959700255	NOT ELIGIBLE
2629 Boyer Ave E	98102	1923	Not Eligible	1959700680	ELIGIBLE
2631 Boylston Ave E	98102	1914	Not Eligible	1959700260	NOT ELIGIBLE
2633 Boyer Ave E	98102	1923	Individually Eligible, Criterion C	1959700690	ELIGIBLE
2637 Boyer Ave E	98102	1923	Not Eligible	1959700695	ELIGIBLE
2637 Boylston Ave E	98102	1906	Not Eligible	1959700270	NOT ELIGIBLE
267 E Newton St	98102	1909	Not Eligible	4086300045	ELIGIBLE
269 E Boston St	98102	1929	Individually Eligible, Criterion C	2902200041	ELIGIBLE
2703 Boyer Ave E	98102	1924	Not Eligible	3720900065	NOT ELIGIBLE
2703 Boylston Ave E	98102	1960	Not Eligible	763365000	NOT ELIGIBLE
2706 Boyer Ave E	98102	1951	Not Eligible	3720800015	NOT ELIGIBLE
2707 Boyer Ave E	98102	1926	Not Eligible	3720900070	NOT ELIGIBLE
2710 Boyer Ave E	98102	1936	Not Eligible	3720800010	NOT ELIGIBLE
2711 Boyer Ave E	98102	1926	Not Eligible	3720800075	NOT ELIGIBLE
2712 Boyer Ave E	98102	1953	Individually Eligible, Criterion C	3720800005	NOT ELIGIBLE
2717 Boyer Ave E	98102	1919	Individually Eligible, Criterion C	3720800080	ELIGIBLE
2717 Boylston Ave E	98102	1919	Not Eligible	1959701145	NOT ELIGIBLE
2722 Eastlake Ave E	98102	1970	Not Eligible	1959701170	NOT ELIGIBLE
2723 Boylston Ave E	98102	1908	Not Eligible	1959701150	NOT ELIGIBLE
2724 Boyer Ave E	98102	1924	Not Eligible	2025049104	NOT ELIGIBLE
2727 Boylston Ave E	98102	1909	Not Eligible	1959701155	ELIGIBLE
2730 Boyer Ave E	98102	1924	Not Eligible	2025049112	NOT ELIGIBLE
2730 Franklin Ave E	98102	1926	Not Eligible	1959701075	NOT ELIGIBLE
2733 Franklin Ave E	98102	1950	Not Eligible	1959701230	ELIGIBLE
2800 Franklin Ave E	98102	1959	Not Eligible	1959701495	NOT ELIGIBLE
2802 Boyer Ave E	98102	1923	Not Eligible	1959702065	NOT ELIGIBLE
2803 Boylston Ave E	98102	1909	Not Eligible	1959701496	NOT ELIGIBLE
2805 Boyer Ave E	98102	1925	Individually Eligible, Criterion C	1959701945	NOT ELIGIBLE
2806 Boyer Ave E	98102	1906	Not Eligible	1959702050	NOT ELIGIBLE
2807 Franklin Ave E	98102	1928	Individually Eligible, Criterion C	1959701435	ELIGIBLE
2809 Boyer Ave E	98102	1923	Not Eligible	1959701955	NOT ELIGIBLE
2810 Eastlake Ave E	98102	1939	Not Eligible	1959701400	NOT ELIGIBLE
2811 Franklin Ave E	98102	1924	Individually Eligible, Criterion C	1959701440	ELIGIBLE
2812 Boyer Ave E	98102	1954	Not Eligible	1959702045	NOT ELIGIBLE

2813 Boyer Ave E	98102	1923	Not Eligible	1959701965	NOT ELIGIBLE
2817 Boyer Ave E	98102	1923	Not Eligible	1959701975	NOT ELIGIBLE
2818 Boyer Ave E	98102	1965	Not Eligible	1959702040	NOT ELIGIBLE
2819 Franklin Ave E	98102	1901	Individually Eligible, Criterion C	1959701445	ELIGIBLE
2820 Eastlake Ave E	98102	1918	Not Eligible	1959701395	NOT ELIGIBLE
2821 Boyer Ave E	98102	1922	Not Eligible	1959701980	NOT ELIGIBLE
2821 Franklin Ave E	98102	1926	Individually Eligible, Criterion C	1959701450	ELIGIBLE
2822 Eastlake Ave E	98102	1925	Not Eligible	1959701390	ELIGIBLE
2827 Boyer Ave E	98102	1922	Not Eligible	1959701985	NOT ELIGIBLE
2828 - 2840 Eastlake Ave E	98102	1958	Individually Eligible, Criterion C	1959701376 & 65	ELIGIBLE
2828 Boyer Ave E	98102	1918	Not Eligible	1959702030	NOT ELIGIBLE
2830 Boyer Ave E	98102	1947	Not Eligible	1959702025	NOT ELIGIBLE
2831 Boyer Ave E	98102	1923	Not Eligible	1959701995	NOT ELIGIBLE
2835 Boyer Ave E	98102	1923	Not Eligible	1959702005	NOT ELIGIBLE
2836 Boyer Ave E	98102	1945	Not Eligible	1959702020	NOT ELIGIBLE
2837 Franklin Ave E	98102	1942	Not Eligible	1959701465	ELIGIBLE
2839 Boyer Ave E	98102	1924	Not Eligible	1959702015	NOT ELIGIBLE
2852 Eastlake Ave E	98102	1957	Not Eligible	1959701355	ELIGIBLE
2900 Fuhrman Ave E	98102	1919	Not Eligible	1959702194	NOT ELIGIBLE
2906 Fuhrman Ave E	98102	1926	Not Eligible	1959702190	NOT ELIGIBLE
2917 Fuhrman Ave E	98102	1922	Individually Eligible, Criterion C	1962200405	ELIGIBLE
2918 Fuhrman Ave E	98102	1920	Not Eligible	2662600000	NOT ELIGIBLE
2921 Eastlake Ave E	98102	1970	Not Eligible	1959702715	NOT ELIGIBLE
2926 Fuhrman Ave E	98102	1920	Individually Eligible, Criterion C	1959702165	ELIGIBLE
2928 Fuhrman Ave E	98102	1949	Not Eligible	1959702160	NOT ELIGIBLE
2930 Harvard Ave E	98102	1959	Not Eligible	1962200560	NOT ELIGIBLE
2932 Fuhrman Ave E	98102	1923	Individually Eligible, Criterion C	1959702155	ELIGIBLE
2946 Fuhrman Ave E	98102	1937	Not Eligible	1959702140	ELIGIBLE
3002 Harvard Ave E	98102	1916	Not Eligible	1959702230	NOT ELIGIBLE
3006 Fuhrman Ave E	98102	1920	Not Eligible	1959702126	NOT ELIGIBLE
3008 Harvard Ave E	98102	1926	Not Eligible	1959702235	NOT ELIGIBLE
3012 Fuhrman Ave E	98102	1953	Not Eligible	4088800595	NOT ELIGIBLE
3018 Fuhrman Ave E	98102	1926	Not Eligible	1959702115	NOT ELIGIBLE
3020 Harvard Ave E	98102	1965	Not Eligible	1959702463	NOT ELIGIBLE

3021 Fuhrman Ave E	98102	1923	Not Eligible	1959702390	NOT ELIGIBLE
3025 Fuhrman Ave E	98102	1923	Not Eligible	1959702385	NOT ELIGIBLE
3100 Franklin Ave E	98102	1924	Individually Eligible, Criterion C	9245500000	ELIGIBLE
3101 - 3103 Eastlake Ave E	98102	1945	Not Eligible	1959702740	NOT ELIGIBLE
3106 Fuhrman Ave E	98102	1928	Individually Eligible, Criterion C	1959702990	ELIGIBLE
3109 Franklin Ave E	98102	1923	Not Eligible	1959702900	NOT ELIGIBLE
3111 - 3115 Eastlake Ave E	98102	1953	Not Eligible	1959702745	NOT ELIGIBLE
3111 Franklin Ave E	98102	1922	Not Eligible	1959702920	NOT ELIGIBLE
3112 Fuhrman Ave E	98102	1927	Not Eligible	1959702985	NOT ELIGIBLE
3115 Franklin Ave E	98102	1922	Not Eligible	1959702925	NOT ELIGIBLE
3116 Fuhrman Ave E	98102	1928	Individually Eligible, Criterion C	1959702980	ELIGIBLE
3119 Eastlake Ave E	98102	1927	Not Eligible	1959702760	NOT ELIGIBLE
3120 Fuhrman Ave E	98102	1930	Not Eligible	1959702975	NOT ELIGIBLE
3120 Harvard Ave E	98102	1924	Not Eligible	1959702937	NOT ELIGIBLE
3121 Fuhrman Ave E	98102	1914	Not Eligible	1962200255	NOT ELIGIBLE
3123 Fuhrman Ave E	98102	1923	Not Eligible	1962200265	NOT ELIGIBLE
3126 Fuhrman Ave E	98102	1928	Not Eligible	1959702970	NOT ELIGIBLE
3127 Fuhrman Ave E	98102	1923	Not Eligible	1962200270	NOT ELIGIBLE
3136 Broadway E	98102	1922	Not Eligible	1962200285	NOT ELIGIBLE
3136 Fuhrman Ave E	98102	1928	Not Eligible	1959702960	NOT ELIGIBLE
3142 Fuhrman Ave E	98102	1923	Not Eligible	1959702955	NOT ELIGIBLE
3145 Broadway E	98102	1918	Not Eligible	1962200130	NOT ELIGIBLE
3146 Fuhrman Ave E	98102	1923	Not Eligible	1959702950	NOT ELIGIBLE
3152 Fuhrman Ave E	98102	1970	Not Eligible	1959702945	NOT ELIGIBLE
3202 Fuhrman Ave E	98102	1923	Not Eligible	1959703105	NOT ELIGIBLE
3206 Fuhrman Ave E	98102	1923	Not Eligible	1959703095	NOT ELIGIBLE
3206 Harvard Ave E	98102	1924	Individually Eligible, Criterion C	1959703155	ELIGIBLE
3207 Fuhrman Ave E	98102	1913	Not Eligible	1962200135	NOT ELIGIBLE
3210 Fuhrman Ave E	98102	1954	Not Eligible	1959703085	NOT ELIGIBLE
3211 Fuhrman Ave E	98102	1913	Not Eligible	1962200140	NOT ELIGIBLE
3215 Fuhrman Ave E	98102	1922	Not Eligible	1962200015	NOT ELIGIBLE
3216 Fuhrman Ave E	98102	1955	Not Eligible	1959703080	NOT ELIGIBLE
3218 Franklin Ave E	98102	1923	Not Eligible	1962200005	NOT ELIGIBLE
3220 - 3222 Fuhrman Ave E	98102	1927	Not Eligible	1959703070	NOT ELIGIBLE

3226 Fuhrman Ave E	98102	1928	Individually Eligible, Criterion C	7766800000	ELIGIBLE
3230 - 3232 Fuhrman Ave E	98102	1960	Not Eligible	1959703055	NOT ELIGIBLE
3240 Eastlake Ave E	98102	1909	Not Eligible	1959703120	ELIGIBLE
3240 Fuhrman Ave E	98102	1955	Individually Eligible, Criterion C	1959703035	ELIGIBLE
3242 Eastlake Ave E	98102	1916	Individually Eligible, Criterion C	5175100000	ELIGIBLE
3245 Eastlake Ave E	98102	1970	Not Eligible	1959703260	NOT ELIGIBLE
3254 Portage Bay Place	98102	1925	Not Eligible	4088801438	NOT ELIGIBLE
3257 Fuhrman Ave E	98102	1925	Not Eligible	1959703200	NOT ELIGIBLE
3261 Fuhrman Ave E	98102	1952	Individually Eligible, Criterion C	1959703190	ELIGIBLE
3272 Fuhrman Ave E	98102	1916	Not Eligible	1959703000	NOT ELIGIBLE
400 NE 45th St	98105	1966	Not Eligible	1890000005	NOT ELIGIBLE
4000 7th Ave NE	98105	1969	Not Eligible	4092301880	NOT ELIGIBLE
4001 9th Ave NE	98105	1964	Individually Eligible, Criterion C	4092301675	ELIGIBLE
4029 7th Ave NE	98105	1909	Not Eligible	4092302120	NOT ELIGIBLE
4030 7th Ave NE	98105	1925	Individually Eligible, Criterion C	4092301860	ELIGIBLE
4033 7th Ave NE	98105	1908	Not Eligible	4092302105	NOT ELIGIBLE
4036 7th Ave NE	98105	1908	Not Eligible	4092301855	NOT ELIGIBLE
4041 - 4043 Roosevelt Way NE	98105	1924	Not Eligible	1145000365	NOT ELIGIBLE
4041 7th Ave NE	98105	1909	Not Eligible	4092302085	NOT ELIGIBLE
4047 7th Ave NE	98105	1918	Not Eligible	4092302075	NOT ELIGIBLE
4048 7th Ave NE	98105	1916	Not Eligible	4092301825	NOT ELIGIBLE
4049 7th Ave NE	98105	1918	Not Eligible	4092302065	NOT ELIGIBLE
4052 7th Ave NE	98105	1905	Not Eligible	4092301815	NOT ELIGIBLE
4053 7th Ave NE	98105	1923	Not Eligible	4092302055	NOT ELIGIBLE
4054 7th Ave NE	98105	1918	Not Eligible	4092301905	NOT ELIGIBLE
4100 Roosevelt Way NE	98105	1967	Not Eligible	1142001825	NOT ELIGIBLE
4140 Roosevelt Way NE	98105	1962	Not Eligible	1142001871	NOT ELIGIBLE
4201 Roosevelt Way NE	98105	1969	Not Eligible	1145000231	NOT ELIGIBLE
4206 7th Ave NE	98105	1925	Individually Eligible, Criterion C	4092301050	ELIGIBLE
4210 7th Ave NE	98105	1910	Individually Eligible, Criterion C	4092301040	NOT ELIGIBLE
4211 7th Ave NE	98105	1910	Not Eligible	4092300885	NOT ELIGIBLE
4212 - 4214 Roosevelt Way NE	98105	1924 / 1967	Individually Eligible, Criteria A & C	1142000710 (&25)	ELIGIBLE
4226 7th Ave NE	98105	1911	Not Eligible	4092301005	NOT ELIGIBLE
4229 7th Ave NE	98105	1939	Not Eligible	4092300840	NOT ELIGIBLE

4247 7th Ave NE	98105	1919	Not Eligible	4092300800	ELIGIBLE
4258 7th Ave NE	98105	1908	Not Eligible	4092300930	NOT ELIGIBLE
4261 Roosevelt Way NE	98105	1924	Not Eligible	1145000165	NOT ELIGIBLE
4263 7th Ave NE	98105	1907	Not Eligible	4092300765	NOT ELIGIBLE
4302 7th Ave NE	98105	1900	Not Eligible	4092300405	NOT ELIGIBLE
4303 7th Ave NE	98105	1922	Not Eligible	4092300720	NOT ELIGIBLE
4308 7th Ave NE	98105	1921	Not Eligible	4092300410	NOT ELIGIBLE
4309 7th Ave NE	98105	1918	Not Eligible	4092300715	NOT ELIGIBLE
4311 7th Ave NE	98105	1918	Not Eligible	4092300705	ELIGIBLE
4315 7th Ave NE	98105	1922	Not Eligible	409230695	NOT ELIGIBLE
4427 5th Ave NE	98105	1959	Not Eligible	3131201910	NOT ELIGIBLE
4501 Roosevelt Way NE	98105	1926	Individually Eligible, Criterion C	6336200380	ELIGIBLE
4516 7th Ave NE	98105	1917	Not Eligible	8812400380	NOT ELIGIBLE
4520 7th Ave NE	98105	1925	Not Eligible	8812400370	NOT ELIGIBLE
4523 5th Ave NE	98102	1915	Not Eligible	1890000030	NOT ELIGIBLE
4525 5th Ave NE	98105	1921	Not Eligible	1890000035	NOT ELIGIBLE
4531 5th Ave NE	98105	1923	Not Eligible	1890000040	NOT ELIGIBLE
4535 5th Ave NE	98105	1923	Not Eligible	1890000045	NOT ELIGIBLE
4539 5th Ave NE	98105	1908	Not Eligible	1890000050	NOT ELIGIBLE
4541 5th Ave NE	98105	1919	Individually Eligible, Criterion C	1890000055	ELIGIBLE
4544 7th Ave NE	98105	1971	Not Eligible	8812400315	NOT ELIGIBLE
4545 5th Ave NE	98105	1919	Individually Eligible, Criterion C	1890000060	ELIGIBLE
4551 5th Ave NE	98105	1912	Not Eligible	1890000065	NOT ELIGIBLE
4555 5th Ave NE	98105	1919	Not Eligible	1890000070	NOT ELIGIBLE
4559 5th Ave NE	98105	1919	Individually Eligible, Criterion C	1890000075	ELIGIBLE
4701 5th Ave NE	98105	1921	Not Eligible	8818900395	NOT ELIGIBLE
4707 5th Ave NE	98105	1920	Not Eligible	8818900390	NOT ELIGIBLE
4715 5th Ave NE	98105	1914	Not Eligible	8818900380	NOT ELIGIBLE
4719 5th Ave NE	98105	1922	Not Eligible	8818900375	NOT ELIGIBLE
4721 5th Ave NE	98105	1914	Not Eligible	8818900370	NOT ELIGIBLE
4725 5th Ave NE	98105	1913	Not Eligible	8818900365	NOT ELIGIBLE
4731 5th Ave NE	98105	1914	Not Eligible	8818900360	NOT ELIGIBLE
4733 5th Ave NE	98105	1928	Not Eligible	8818900355	NOT ELIGIBLE
4739 5th Ave NE	98105	1912	Not Eligible	8818900350	NOT ELIGIBLE

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STATE OF WASHINGTON

**DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION**

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501  
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343  
(360) 586-3065 • Fax Number (360) 586-3067 • Website: [www.dahp.wa.gov](http://www.dahp.wa.gov)

September 16, 2010

Ms. Lori Durio  
SR 520 Bridge Replacement and HOV Program  
600 Stewart Street, Suite 520  
Seattle, WA 98101

In future correspondence please refer to:

Log: 121602-08-FHWA

Property: SR 520 Corridor Trans-Lake Washington, Bridge Replacement and HOV

Re: Determined Eligible

Dear Ms. Durio:

Thank you for contacting our office. I am contacting you on behalf of Michael Houser, State Architectural Historian, who has reviewed the historic property inventory (HPI) forms that you submitted for review as part of your Section 6(f) study. Mr. Houser does not concur with your determinations of eligibility for the resources submitted as part of this study.

We concur with your determination that the Bryant Building is eligible for listing in the National Register of Historic Properties (NRHP). We **do not** concur, however, that the properties at 10034, 10036, and 10038 Rainier Ave South are not eligible for listing in the NRHP. We concur that the remaining properties identified in your report can be considered as not eligible for listing in the NRHP. We look forward to further consultation regarding your determination of effect.

I would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4) and the survey report when it is available.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,

Matthew Sterner, M.A.  
Transportation Archaeologist  
(360) 586-3082  
[matthew.sterner@dahp.wa.gov](mailto:matthew.sterner@dahp.wa.gov)



**DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION**

*Protect the Past. Shape the Future.*



**Advisory Council on Historic  
Preservation Consultation**





U.S. Department  
of Transportation  
**Federal Highway  
Administration**

Washington Division

Suite 501 Evergreen Plaza  
711 South Capitol Way  
Olympia, Washington 98501-1284  
(360) 753-9480  
(360) 753-9889 (FAX)  
<http://www.fhwa.dot.gov/wadiv>

May 24, 2010

HMP-WA/WA 649

ACHP  
Carol Legard  
Old Post Office Building  
1100 Pennsylvania Avenue, NW, Suite 803  
Washington, DC 20004

**ACHP Participation in the SR 520 I-5 to  
Medina: Bridge Replacement and HOV  
Project**

Dear Ms. Legard:

We are writing to invite participation by the Advisory Council on Historic Preservation (ACHP) in the SR 520 I-5 to Medina: Bridge Replacement and HOV Project in Seattle and Medina, King County, Washington.

In compliance with Section 106 and the National Environmental Policy Act (NEPA), the Washington State Department of Transportation (WSDOT) developed a Supplemental Draft Environmental Impact Statement (SDEIS) in January 2010 (enclosed). Subsequently, a Preferred Alternative was announced on April 29, 2010. WSDOT, on behalf of the Federal Highway Administration (FHWA), is analyzing how the Preferred Alternative will affect historic properties within the Area of Potential Effects (APE).

FHWA and WSDOT, in consultation with the Washington State Historic Preservation Officer (SHPO), multiple consulting parties, and affected Tribes, have determined that several properties within the APE are eligible for the National Register of Historic Places (NRHP). The SHPO concurred with these determinations of eligibility on August 27, 2009. However, there will be revisions to the APE and further study associated with those revisions in relation to the Preferred Alternative.

The project is located within a culturally sensitive area and will have an adverse effect on historic properties, though WSDOT has not yet made a formal determination of effect for the project. The formal determination of effect will be made after study of the revised APE.



The project has a number of unusual and significant issues, which warrant participation by the ACHP per Appendix A of 36CFR800.16:

- **There are a number of potential Traditional Cultural Properties in the APE.** No formally documented Traditional Cultural Properties (TCPs) currently exist within the APE. However, WSDOT has identified one potential Native American TCP and two potential non-Native American TCPs:
  - Foster Island, known to be a location of Native American importance, may qualify as a TCP. WSDOT has conducted an ethnographic study of the project area, and information learned through that research led WSDOT and FHWA to treat Foster Island as a potentially eligible TCP in the SDEIS, although it is not yet formally documented. WSDOT is now gathering additional information to prepare a formal determination of eligibility for Foster Island as an NRHP-eligible TCP.
  - The Seattle Yacht Club, which is listed in the NRHP under Criteria A and C, has hired a consulting firm who recommended that Portage Bay, upon which the Yacht Club is located, is a Traditional Cultural Property, significant for the Seattle Yacht Club's Opening Day of Boating festivities. However, a preliminary study commissioned by WSDOT concludes that the Seattle Yacht Club does not constitute a "community" and that the Opening Day of Boating festivities are not traditional cultural practices.
  - Although not currently within the APE, WSDOT is assessing whether the St. Demetrios Greek Orthodox Church's annual Greek Festival would be a TCP. A preliminary study commissioned by WSDOT concludes that the participants in the Greek Festival do not constitute a "community" and that the Festival is not a traditional cultural practice. However, the church itself is likely eligible for listing in the NRHP, and when the APE is expanded to include the church, WSDOT will make a determination of NRHP eligibility.
- **The scope of the identification efforts for built environment properties is unusually large.** There are hundreds of built environment historic properties in the APE, including historic districts, historic landscapes, and historic bridges. At the beginning of the project, there were ten previously identified historic properties in the Seattle area of the APE. The cultural resources team surveyed an additional 229 historic resources, of which 146 are eligible for listing in the NRHP (either individually or as a contributing resource to historic districts).

WSDOT will be expanding the APE to include 6(f) mitigation sites, a stormwater retention area, and potential truck haul routes. There will likely be additional historic properties in these areas. Per guidelines outlined by the Department of Archaeology and Historic Preservation (DAHP), WSDOT will be surveying and inventorying 100% of the historic resources constructed prior to 1972 in the expanded APE, including along all potential haul routes for the project. This will result in the additional survey and inventory of approximately 400 properties.

- **Among the historic properties within the APE, there are two historic districts, an Arboretum, and a NRHP-eligible bridge.** The Roanoke Park Historic District was listed in the NRHP in August 2009, and the Montlake Historic District has been determined eligible for listing in the NRHP. The Washington Park Arboretum, a historic landscape encompassing 230 acres, is also eligible for listing in the NRHP. The Arboretum will be affected by this undertaking and some property from the Arboretum may be acquired. The SR 520 Evergreen Point Floating Bridge (Governor [Albert D. Rosellini](#) Bridge) spans Lake Washington and is over two miles long. Completed in 1963, it has also been determined eligible for listing in the NRHP under Criteria Consideration G, and it will be replaced as part of this undertaking.
- **There is an unusual degree of public involvement.** Section 106 consulting parties, which include neighborhood associations, advocacy groups, government agencies, Tribes, and educational institutions, have been involved in the Section 106 process. Many have disagreed with WSDOT's preliminary effects determinations. WSDOT and FHWA are continuing consultation with these parties and will continue to consider the views of all consulting parties. Due to the complexity of the project, its location in a residential urban corridor, and its long construction period, the project has become an important issue in adjacent communities. Ongoing Section 106 consultation will likely involve disputes that may not be easily resolved.
- **There are multiple Native American tribes involved.** The APE lies within lands and waters once occupied by Lakes Duwamish Indians whose descendants are enrolled into several federally recognized Indian Tribes including the Muckleshoot Indian Tribe, Suquamish Tribe, Snoqualmie Tribe, the Tulalip Tribes, and the Yakama Nation, as well as the non-federally recognized Duwamish Tribal Services. WSDOT is consulting with these tribes about Foster Island and other issues.
- **There is a known archaeological site within the APE.** The Miller Street Landfill has not yet had a determination of eligibility for the NRHP, but a previous study recommended further research and stated that it could be eligible. Research is currently underway to inform a determination of NRHP eligibility. If it is eligible, project-related activities will likely result in an adverse effect on the site.
- **There is believed to be a Native American cemetery in the APE.** Foster Island is widely believed to have been a Native American cemetery with tree burials as well as possible interments. Due to the sensitive nature of the site, every effort has been made to minimize ground disturbance and damage at the site. In consultation with interested Tribes, WSDOT has delayed ground disturbing archaeological investigations in this area until selection of the Preferred Alternative and refinement of known project ground disturbance from the new bridge. Now that a Preferred Alternative has been selected, a work plan to address the archaeological testing is being drafted, and consultation with the Tribes and SHPO will become more frequent.
- **Mitigation will be reached through a Programmatic Agreement.** This is a large and complex project, and some effects on historic properties cannot be fully determined prior to approval of the undertaking. For instance, several natural resource mitigation sites will

not be identified early enough to perform archaeological identification for the Discipline Report. The same is true for Section 6(f) mitigation sites.

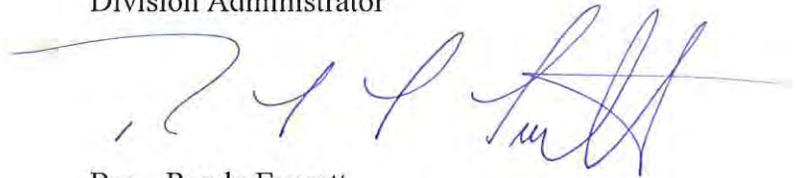
WSDOT and FHWA request the ACHP's participation in order to ensure that all Section 106 requirements are met in consideration of the challenges outlined above.

Enclosed in this package is the draft Cultural Resources Discipline Report, which was prepared in concert with the SDEIS. All appendices to the report are included on the accompanying CD. Following your review of these materials, we would like to schedule a teleconference with you to further discuss the undertaking, the Section 106 challenges, and the ACHP's potential participation in the process.

If you have any questions or require additional information on this project, please contact me at 206-220-7538, or via email at [randolph.everett@dot.gov](mailto:randolph.everett@dot.gov). Thank you in advance for your interest in this project.

Sincerely,

DANIEL M. MATHIS, P.E.  
Division Administrator

A handwritten signature in blue ink, appearing to read 'Randy Everett', is written over a horizontal line.

By: Randy Everett  
Major Projects Oversight Manager

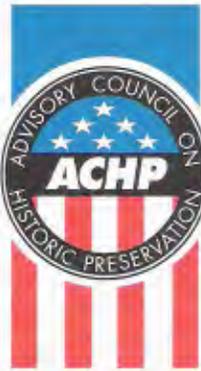
Enclosures

CC: Dr. Allyson Brooks, DAHP  
Allison Hanson, WSDOT  
Julie Meredith, WSDOT  
Scott Williams, WSDOT

Milford Wayne Donaldson  
Chairman

Susan S. Barnes  
Vice Chairman

John M. Fowler  
Executive Director



Preserving America's Heritage

July 22, 2010

Mr. Victor Mendez  
Administrator  
Federal Highway Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

***Ref: Proposed SR 520 I-5 to Medina Bridge Replacement and HOV Project  
Seattle and Medina, King County, Washington***

Dear Administrator Mendez:

In response to a notification by the Federal Highway Administration, the Advisory Council on Historic Preservation (ACHP) will participate in consultation to develop a Programmatic Agreement for the proposed SR 520 I-5 to Medina Bridge Replacement and HOV Project. Our decision to participate in this consultation is based on the *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, contained within our regulations. The criteria are met for this proposed undertaking because it has the potential for presenting procedural problems and generating substantial public controversy related to historic preservation issues.

Section 800.6(a)(1)(iii) of our regulations requires that we notify you, as the head of the agency, of our decision to participate in consultation. By copy of this letter, we are also notifying Division Administrator David Mathis of the Washington Division of this decision.

Our participation in this consultation will be handled by Najah Duvall-Gabriel who can be reached at 202-606-8585, or via e-mail at [ngabriel@achp.gov](mailto:ngabriel@achp.gov). We look forward to working with your agency and other consulting parties to consider alternatives to this undertaking that could avoid, minimize, or mitigate potential adverse effects on historic properties and to reach a Programmatic Agreement.

Sincerely,

John M. Fowler  
Executive Director

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004  
Phone: 202-606-8503 • Fax: 202-606-8647 • [achp@achp.gov](mailto:achp@achp.gov) • [www.achp.gov](http://www.achp.gov)



**National Parks Service  
Consultation**





# United States Department of the Interior

## NATIONAL PARK SERVICE

Pacific West Region  
909 First Avenue, Fifth Floor  
Seattle, Washington 98104-1060



(H40) PWRO-CR

July 26, 2010

Marsha Tolon  
Washington State Department of Transportation  
999 Third Avenue, Suite 900  
Seattle, WA 98104

Re: Stipulation for Historic American Engineering Record (HAER) documentation for the Evergreen Point Bridge

Dear Ms. Tolon,

This is in response to your request for stipulation for Historic American Engineering Record (HAER) documentation of the Evergreen Point Bridge. The Evergreen Point Bridge has been determined eligible for the National Register of Historic Places under Criteria C with Criteria Consideration G. The bridge is nearing the end of its useful life and will be replaced. The Federal Highway Commission and the Washington State Department of Transportation agreed to mitigate the removal, in part, through HAER documentation. The Washington State Historic Preservation Officer and the National Park Service have agreed that Level II HAER documentation will be adequate.

Documentation will consist of the following:

### Photographs

Please provide large-format, 4" x 5", 5" x 7", or 8"x10" (enlarged from 4" x 5" or 8"x10" negatives) black and white photographs showing the Evergreen Point Bridge and the transition spans. These images should capture any significant or characteristic details or features associated with the structures, such as (but not limited to) the east and west sides of the bridge, the lift-draw spans, the pontoon deck, the elevated steel truss spans, the steel truss span fixed piers, signage, lighting, and railings. The images should also provide views showing the bridge within its larger environmental setting to give the viewer a sense of the structure's scale and extent.

Please follow the HAER guidelines for preparing the negatives and prints for submittal to ensure that they are archivally stable and meet the HAER photographic standards. HAER guidelines can be found at <http://www.nps.gov/history/hdp/standards/haerguidelines.htm>. You are responsible for providing two copies of each photograph, one for the Library of Congress and one for the Washington State Historic Preservation Officer.

### Written History

The written historical and descriptive report should document the design, construction, and use of the Evergreen Point Bridge. The report should illustrate the place of the bridge within the larger context of transportation in Seattle, and it should highlight any unique engineering aspects associated with its history. Please refer to the guidelines for HAER historical reports at the website referenced above.

### Drawings

You will not need to supply measured drawings. However, you should photographically reproduce any original construction drawings, sketch plans, details of significant architectural features, or similar available materials using large-format photographs and 8x10 prints. The materials need only be representative rather than comprehensive examples of the structures' plans, design and construction. Alternatively, you can scan these same images and include them at the end of the written history section.

After you have prepared the documentation, you will submit a draft copy to the National Park Service for review. We will then assign the project a HAER number and return to you the materials for final preparation. Once we have received and accepted the final documentation, we will submit the original to the Historic American Buildings Survey/Historic American Engineering Record/Historic American Landscape Survey Collection in the Library of Congress. We will also forward an archival copy of the documentation to the Washington State Historic Preservation Officer.

Should you have any questions regarding this documentation, please contact me at 206.220.4127 or [Christine\\_Avery@nps.gov](mailto:Christine_Avery@nps.gov)

Sincerely,



Christy Avery  
Historian  
NPS Pacific West Regional Office-Seattle

Cc: Allyson Brooks, Washington State Historic Preservation Officer, PO Box 48343, Olympia, WA, 98504-8343



**Consulting Party Consultation**



Copies of the following letter #2-1 were sent to the following individuals:

Date	Subject	From	To	Corresp. Ref. No.
4/8/2009	SR 520 Bridge Replacement and HOV Project Seattle, King County, Washington Area of Potential Effects (APE)	Julie Meredith SR 520 Program Director WSDOT	<p>Karen Gordon, Supervisor City of Seattle Historic Preservation Division PO Box 94649 Seattle, WA 98124-4649</p> <p>Eugenia Woo Docomomo WEWA PO Box 70245 Seattle, WA 98127</p> <p>President Eastlake Community Council 117 E. Louisa Street, PMB #1 Seattle, WA 98102</p> <p>Doug Jackson, President Friends of Seattle's Olmsted Parks PO Box 9884 Seattle, WA 98109</p> <p>Kitty Henderson, Executive Director Historic Bridge Foundation PO Box 66245 Austin, TX 78766</p> <p>Kathleen Brooker, Executive Dir. Historic Seattle Preservation Foundation The Dearborn House 1117 Minor Avenue Seattle, WA 98101</p> <p>Jon Decker, AIA Montlake Community Club 2311 16th Avenue Seattle, WA 98112</p> <p>Leonard Garfield, Executive Dir. Museum of History and Industry (MOHAI) 2700 24th Avenue E Seattle, WA 98112</p> <p>Barry Thom, Acting NW Regional Administrator National Oceanic and Atmospheric Administration 7600 Sand Point Way NE Seattle, WA 98115-0070</p> <p>John Gaines, President Portage Bay/Roanoke Park Community Council 1108 E Edgar Street Seattle, WA 98102</p> <p>Commodore Thomas F. Foti Seattle Yacht Club 1807 Hamilton Street Seattle, WA 98112</p>	<p>LTR #023</p> <p>LTR #024</p> <p>LTR #025</p> <p>LTR #026</p> <p>LTR #027</p> <p>LTR #028</p> <p>LTR #029</p> <p>LTR #030</p> <p>LTR #031</p> <p>LTR #032</p> <p>LTR #033</p>

**Copies of the following letter #2-1 were sent to the following individuals:**

Date	Subject	From	To	Corresp. Ref. No.
4/8/2009	SR 520 Bridge Replacement and HOV Project Seattle, King County, Washington Area of Potential Effects (APE)	Julie Meredith SR 520 Program Director WSDOT	<p>Jennifer Meinser, Executive Dir. The Washington Trust for Historic Preservation 1204 Minor Avenue Seattle, WA 98101</p> <p>Theresa Doherty Assistant Vice President for Regional Affairs Office of Regional Affairs The University of Washington Box 351243 Seattle, WA 98195-1243</p> <p>Deborah Andrews Washington Park Arboretum Foundation 2300 Arboretum Drive E Seattle, WA 98112</p>	<p>LTR #034</p> <p>LTR #035</p> <p>LTR #036</p>



Letter #2-1

**Re: SR 520 Bridge Replacement and HOV Project  
Seattle, King County, Washington  
Area of Potential Effects (APE)**

Dear

Per provisions of 36 CFR 800.3(a), the Federal Highway Administration (FHWA), Washington State Department of Transportation (WSDOT), and Sound Transit are proposing an undertaking to address an identified transportation need in Seattle, King County, Washington. The SR 520 bridges are vulnerable to earthquakes and windstorms and must be replaced. The Bridge Replacement and HOV Project will replace the SR 520 bridges, and include other transit, HOV and community enhancements.

The SR 520 Bridge Replacement and HOV project is one component of the SR 520 Program. The other projects within the program are: SR 520 Eastside Transit and HOV Project, Pontoon Construction Project, and Lake Washington Urban Partnership. The project described in this letter extends from the SR 520 interchange with I-5 to 92<sup>nd</sup> Avenue NE in Yarrow Point. The project would tie in to the Eastside Transit and HOV Project at Evergreen Point Road; restriping would occur from Evergreen Point Road to 92<sup>nd</sup> Avenue NE.

## **Project Description**

A Draft EIS published in August 2006 evaluated No Build, 4-Lane, and 6-Lane alternatives for the SR 520 corridor. The SR 520 Bridge Replacement and HOV project being evaluated in a Supplemental Draft EIS (SDEIS) is a 6-Lane Alternative that would rebuild SR 520 between I-5 and Medina, including replacement of the Evergreen Point Bridge across Lake Washington. The SDEIS currently underway will evaluate three design options for the 6-Lane Alternative in Seattle that were developed by a mediation group in 2007 and 2008, in addition to the No Build Alternative. The mediation group included elected officials, local, federal and state agencies, neighborhood representatives, local organizations and WSDOT. This process focused on west side interchange options and how each design option might affect neighborhoods, traffic, and the environment. Mediation participants also considered the effects to the Washington Park Arboretum and the University of Washington.

The mediation group developed three designs that were included in their 2008 project impact plan and WSDOT will further analyze all three in a NEPA Supplemental Draft EIS consistent with the WSDOT environmental process. The most significant differences are located in the vicinity of the Montlake neighborhood, and figures of the three options in this area are included in Appendix A of this submission. Appendix A also includes a schematic vicinity map. The three designs are:

- **Option A** - Most similar to today's configuration, with the addition of a second Montlake drawbridge over the Montlake Cut (Option A figure).
- **Option K** - Includes a tunnel under the Montlake Cut and a single point urban interchange below the SR 520 roadway (Option K figure).
- **Option L** - Includes a diagonal drawbridge over the Montlake Cut and a single point urban interchange above the SR 520 roadway (Option L figure).

Elements common to each option include:

- Two general-purpose lanes and one HOV lane in each direction (6-Lanes between I-5 and Medina).
- A bicycle and pedestrian path on the north side of SR 520.
- A reversible direct HOV access ramp at the I-5/SR 520 connection.
- Variable speed signs.
- Lids at I-5, 10th Avenue E and Delmar Drive E

More details about each design option are available on the Program's webpage:

<http://www.wsdot.wa.gov/Projects/SR520Bridge/brhpdesign.htm>

### **Area of Potential Effects (APE)**

Pursuant to compliance with Section 106 of the National Historic Preservation Act (NHPA), we are consulting with you about the SR 520 Bridge Replacement and HOV Project. Enclosed (Appendix B) please find maps that illustrate the proposed APE for this project. The proposed APE includes all known areas of impact for all three (3) design options, which includes bridges, tunnels, roadway widening, several intersection improvements that include roadway widening, lids, and ADA-approved pedestrian walkways and upgrades, and known staging, temporary storage, and storm water management facilities. If there are any changes to the project, we will notify your office and provide additional information, including revised APE maps.

### *Built Environment*

The APE for this project includes one parcel on either side of all areas of impact and ground disturbance. This approach is consistent with the APE determination for the former SR 520 project, with which your office concurred in 2005. For areas where only restriping will occur, such as on parts of Interstate-5, we are only including the highway right-of-way. The APE will account both for direct and indirect effects to historic properties. Direct effects may include demolition and alteration to historic properties, while potential indirect effects can be both during construction and subsequent operations, caused by noise, dust and dirt, vibration, change of setting, or other factors. All historic buildings, structures, sites, objects, and districts constructed prior to 1971 will be evaluated and documented. Further, based on our ongoing consultation with

your office, we have included the Washington Park Arboretum in the APE, and will determine eligibility and project effects, both positive and negative, as part of our evaluation

Electronic copies of Historic Property Inventory Database forms will be prepared for all properties that have not been surveyed within the last five years. Any properties surveyed within the last five years will be checked in the field to verify condition and integrity. Database inventory forms will be updated as necessary.

### *Archaeological Resources*

Archaeological sites could be disturbed directly or destroyed by the project within the portion of the APE where construction activities will occur. Therefore, WSDOT has delineated a limits-of-construction (combined-option) to consider potential direct effects to archaeological historic properties. WSDOT plans to continue archaeological investigations to examine all areas either not included in the APE defined for the Draft EIS (2006), or purposefully not included at that time pending more detailed design plans that specifically identified ground disturbance locations (Foster Island). WSDOT intends to use background research, ethnographic study, field investigations, and evaluation of the project area's geomorphology over time to identify archaeological historic properties and to assess the probability of encountering subsurface archaeological remains within the limits of construction. If encountered, archaeological sites will be recorded on DAHP archaeological site inventory forms.

Much of the construction portion of the APE was subjected to subsurface investigations during the Draft EIS process. Only one archaeological site, the Miller Street Landfill (45KI760), was identified. Foster Island is known to have been a burial ground of local Lakes Duwamish Indians, and has been identified as a culturally sensitive landform. WSDOT plans to use geophysical remote sensing, possibly other sophisticated techniques, and traditional archaeological investigations to identify potential burials on the Island (if present) in order to avoid or greatly minimize disturbance to them.

The archaeological portion of the APE also includes a vertical element in order to consider all potential effects from ground disturbance. The vertical APE is defined as either the full vertical limit of proposed construction, or the depth to consolidated glacial sediments, whichever is shallower. The latter part of the definition assumes that glacial sediments either pre-date all human occupation in the Puget Sound region, or would have been deposited after ice sheets scoured the landform and removed any physical evidence of pre-glacial human occupation.

### **Other Consulting Parties**

Per 36 CFR 800.2(c)(2), WSDOT and FHWA presently are consulting with five Native American tribes, including the Muckleshoot Indian Tribe, the Suquamish Tribe, the Snoqualmie Tribe, the Tulalip Tribes, and the Yakama Nation. We also are consulting with the non-federally recognized Duwamish Tribal Community. All tribes and tribal organizations, except for the Yakama Nation, have shown strong interest in the project and the SR 520 Program, and are actively involved with consultation.

Because of the size and scope of this project, WSDOT contacted several groups to participate as Section 106 consulting parties for this project, per provisions in 36 CFR 800.2(c)(5)(d)(i). In a letter dated March 2, 2009, the SR 520 project team invited several agencies, groups, and

organizations to participate as consulting parties, and asked these parties to acknowledge their interest by March 18, 2009. As of today, the following groups have accepted (in writing or by phone) the invitation to participate in the Section 106 process as consulting parties:

- Washington Trust for Historic Preservation
- Eastlake Community Council
- Historic Bridge Foundation
- University of Washington
- Montlake Community Club
- Seattle Yacht Club
- Docomomo.WEWA
- Historic Seattle
- Portage Bay/Roanoke Park Community Council

The City of Seattle Department of Neighborhoods, Historic Preservation Office is also a Section 106 consulting party, since the City of Seattle is a Certified Local Government (CLG). As consulting parties, these organizations will have the opportunity to comment on the APE, identification of historic properties within the APE, and the determination of adverse effects to historic properties. Further, they will be invited to participate in developing measures to mitigate adverse effect to historic properties, if any are necessary. These organizations will be allotted a 30 day review period to comment.

#### **Continuing Consultation**

The APE includes all known structures scheduled for demolition (such as on- and off-ramps), as well as known detours, shooflies, staging, and laydown areas. However, not all locations have been selected at this point. We will certainly consider these areas to be within the APE once they have been determined.

Thank you for your time and attention to this project. We look forward to continuing consultation with you on this project, and to your comments on our proposed APE. We respectfully request your comments by May 11, 2009. If you have any questions, please do not hesitate to contact Architectural Historian Connie Walker Gray at 206-716-1138, or [grayc@wsdot.wa.gov](mailto:grayc@wsdot.wa.gov), or Archaeologist Ken Juell at 206-464-1236, or [juellk@wsdot.wa.gov](mailto:juellk@wsdot.wa.gov).

Sincerely,



Julie Meredith, P.E.  
SR 520 Program Director

Cc: Randy Everett, Federal Highway Administration  
Andrea Tull, Sound Transit  
Karen Gordon, City of Seattle Historic Preservation Officer  
Ken Juell, WSDOT UCO Cultural Resources Specialist  
Marsha Tolon, WSDOT 520 Environmental Lead  
Scott Williams, WSDOT Cultural Resources Program Manager







## SR 520 Bridge Replacement and HOV Program

I-5 to Medina: Bridge Replacement and HOV Project



Letter #2-2

**Re: SR 520 Bridge Replacement and HOV Project  
Seattle, King County, Washington  
Area of Potential Effects (APE)**

Dear

Per provisions of 36 CFR 800.3(a), the Federal Highway Administration (FHWA), Washington State Department of Transportation (WSDOT), and Sound Transit are proposing an undertaking to address an identified transportation need in Seattle, King County, Washington. The SR 520 bridges are vulnerable to earthquakes and windstorms and must be replaced. The Bridge Replacement and HOV Project will replace the SR 520 bridges, and include other transit, HOV and community enhancements.

The SR 520 Bridge Replacement and HOV project is one component of the SR 520 Program. The other projects within the program are: SR 520 Eastside Transit and HOV Project, Pontoon Construction Project, and Lake Washington Urban Partnership. The project described in this letter extends from the SR 520 interchange with I-5 to 92<sup>nd</sup> Avenue NE in Yarrow Point. The project would tie in to the Eastside Transit and HOV Project at Evergreen Point Road; restriping would occur from Evergreen Point Road to 92<sup>nd</sup> Avenue NE.

### **Project Description**

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The mediation group developed three designs that were included in their 2008 project impact plan and WSDOT will further analyze all three in a NEPA Supplemental Draft EIS consistent with the WSDOT environmental process. The most significant differences are located in the vicinity of the Montlake neighborhood, and figures of the three options in this area are included in Appendix A of this submission. Appendix A also includes a schematic vicinity map. The three designs are:

- **Option A** - Most similar to today's configuration, with the addition of a second Montlake drawbridge over the Montlake Cut (Option A figure).
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Elements common to each option include:

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- Variable speed signs.
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More details about each design option are available on the Program's webpage:

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participate as consulting parties, and asked these parties to acknowledge their interest by March 18, 2009. As of today, the following groups have accepted (in writing or by phone) the invitation to participate in the Section 106 process as consulting parties:

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- Eastlake Community Council
- Historic Bridge Foundation
- University of Washington
- Montlake Community Club
- Seattle Yacht Club
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- Historic Seattle
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- Friends of Seattle's Olmsted Parks

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Sincerely,

Julie Meredith, P.E.  
SR 520 Program Director

Cc: Randy Everett, Federal Highway Administration  
Andrea Tull, Sound Transit  
Karen Gordon, City of Seattle Historic Preservation Officer  
Ken Juell, WSDOT UCO Cultural Resources Specialist  
Marsha Tolon, WSDOT 520 Environmental Lead  
Scott Williams, WSDOT Cultural Resources Program Manager







## SR 520 Bridge Replacement and HOV Program

I-5 to Medina: Bridge Replacement and HOV Project



Letter #2-3

**Re: SR 520 Bridge Replacement and HOV Project  
Seattle, King County, Washington  
Area of Potential Effects (APE)**

Dear

Per provisions of 36 CFR 800.3(a), the Federal Highway Administration (FHWA), Washington State Department of Transportation (WSDOT), and Sound Transit are proposing an undertaking to address an identified transportation need in Seattle, King County, Washington. The SR 520 bridges are vulnerable to earthquakes and windstorms and must be replaced. The Bridge Replacement and HOV Project will replace the SR 520 bridges, and include other transit, HOV and community enhancements.

The SR 520 Bridge Replacement and HOV project is one component of the SR 520 Program. The other projects within the program are: SR 520 Eastside Transit and HOV Project, Pontoon Construction Project, and Lake Washington Urban Partnership. The project described in this letter extends from the SR 520 interchange with I-5 to 92<sup>nd</sup> Avenue NE in Yarrow Point. The project would tie into the Eastside Transit and HOV Project at Evergreen Point Road; restriping would occur from Evergreen Point Road to 92<sup>nd</sup> Avenue NE.

### **Project Description**

A Draft EIS published in August 2006 evaluated No Build, 4-Lane, and 6-Lane alternatives for the SR 520 corridor. The SR 520 Bridge Replacement and HOV project being evaluated in a Supplemental Draft EIS (SDEIS) is a 6-Lane Alternative that would rebuild SR 520 between I-5 and Medina, including replacement of the Evergreen Point Bridge across Lake Washington. The SDEIS currently underway will evaluate three design options for the 6-Lane Alternative in Seattle that were developed by a mediation group in 2007 and 2008, in addition to the No Build Alternative. The mediation group included elected officials, local, federal and state agencies, neighborhood representatives, local organizations and WSDOT. This process focused on west side interchange options and how each design option might affect neighborhoods, traffic, and the environment. Mediation participants also considered the effects to the Washington Park Arboretum and the University of Washington.

The mediation group developed three designs that were included in their 2008 project impact plan and WSDOT will further analyze all three in a NEPA Supplemental Draft EIS consistent with the WSDOT environmental process. The most significant differences are located in the vicinity of the Montlake neighborhood, and figures of the three (3) options in this area are included in Appendix A of this submission. Appendix A also includes a schematic vicinity map. The three designs are:

- **Option A** - Most similar to today's configuration, with the addition of a second Montlake drawbridge over the Montlake Cut (Option A figure).
- **Option K** - Includes a tunnel under the Montlake Cut and a single point urban interchange below the SR 520 roadway (Option K figure).
- **Option L** - Includes a diagonal drawbridge over the Montlake Cut and a single point urban interchange above the SR 520 roadway (Option L figure).

Elements common to each option include:

- Two general-purpose lanes and one HOV lane in each direction (6-Lanes between I-5 and Medina).
- A bicycle and pedestrian path on the north side of SR 520.
- A reversible direct HOV access ramp at the I-5/SR 520 connection.
- Variable speed signs.
- Lids at I-5, 10th Avenue E and Delmar Drive E

More details about each design option are available on the Program's webpage:

<http://www.wsdot.wa.gov/Projects/SR520Bridge/brhpdesign.htm>

### **Area of Potential Effects (APE)**

Pursuant to compliance with Section 106 of the National Historic Preservation Act (NHPA), we are consulting with you about the SR 520 Bridge Replacement and HOV Project. Enclosed (Appendix B) please find maps that illustrate the proposed APE for this project. The proposed APE includes all known areas of impact for all three (3) design options, which includes bridges, tunnels, roadway widening, several intersection improvements that include roadway widening, lids, and ADA-approved pedestrian walkways and upgrades, and known staging, temporary storage, and storm water management facilities. If there are any changes to the project, we will notify your office and provide additional information, including revised APE maps.

### *Built Environment*

The APE for this project includes one parcel on either side of all areas of impact and ground disturbance. This approach is consistent with the APE determination for the former SR 520 project. For areas where only restriping will occur, such as on parts of Interstate-5, we are only including the highway right-of-way. The APE will account both for direct and indirect effects to historic properties. Direct effects may include demolition and alteration to historic properties, while potential indirect effects can be both during construction and subsequent operations, caused by noise, dust and dirt, vibration, change of setting, or other factors. All historic buildings, structures, sites, objects, and districts constructed prior to 1971 will be evaluated and documented. Further, based on our ongoing consultation with the Seattle Historic Preservation Office, we have included the Washington Park

Arboretum in the APE, and will determine eligibility and project effects, both positive and negative, as part of our evaluation

Electronic copies of Historic Property Inventory Database forms will be prepared for all properties that have not been surveyed within the last five years. Any properties surveyed within the last five years will be checked in the field to verify condition and integrity. Database inventory forms will be updated as necessary.

### *Archaeological Resources*

Archaeological sites could be disturbed directly or destroyed by the project within the portion of the APE where construction activities will occur. Therefore, WSDOT has delineated a limits-of-construction (combined-option) to consider potential direct effects to archaeological historic properties. WSDOT plans to continue archaeological investigations to examine all areas either not included in the APE defined for the Draft EIS (2006), or purposefully not included at that time pending more detailed design plans that specifically identified ground disturbance locations (Foster Island). WSDOT intends to use background research, ethnographic study, field investigations, and evaluation of the project area's geomorphology over time to identify archaeological historic properties and to assess the probability of encountering subsurface archaeological remains within the limits of construction. If encountered, archaeological sites will be recorded on DAHP archaeological site inventory forms.

Much of the construction portion of the APE was subjected to subsurface investigations during the Draft EIS process. Only one archaeological site, the Miller Street Landfill (45KI760), was identified. Foster Island is known to have been a burial ground of local Lakes Duwamish Indians, and has been identified as a culturally sensitive landform. WSDOT plans to use geophysical remote sensing, possibly other sophisticated techniques, and traditional archaeological investigations to identify potential burials on the Island (if present) in order to avoid or greatly minimize disturbance to them.

The archaeological portion of the APE also includes a vertical element in order to consider all potential effects from ground disturbance. The vertical APE is defined as either the full vertical limit of proposed construction, or the depth to consolidated glacial sediments, whichever is shallower. The latter part of the definition assumes that glacial sediments either pre-date all human occupation in the Puget Sound region, or would have been deposited after ice sheets scoured the landform and removed any physical evidence of pre-glacial human occupation.

### **Other Consulting Parties**

Per 36 CFR 800.2(c)(2), WSDOT and FHWA presently are consulting with five Native American tribes, including the Muckleshoot Indian Tribe, the Suquamish Tribe, the Snoqualmie Tribe, the Tulalip Tribes, and the Yakama Nation. We also are consulting with the non-federally recognized Duwamish Tribal Community. All tribes and tribal organizations, except for the Yakama Nation, have shown strong interest in the project and the SR 520 Program, and are actively involved with consultation.

Because of the size and scope of this project, WSDOT contacted several groups to participate as Section 106 consulting parties for this project, per provisions in 36 CFR 800.2(c)(5)(d)(i). In a letter dated March 2, 2009, the SR 520 project team invited several agencies, groups, and organizations to

participate as consulting parties, and asked these parties to acknowledge their interest by March 18, 2009. As of today, the following groups have accepted (in writing or by phone) the invitation to participate in the Section 106 process as consulting parties:

- Washington Trust for Historic Preservation
- Eastlake Community Council
- Historic Bridge Foundation
- University of Washington
- Montlake Community Club
- Seattle Yacht Club
- Docomomo.WEWA
- Historic Seattle
- Portage Bay/Roanoke Park Community Council
- Friends of Seattle's Olmsted Parks

The City of Seattle Department of Neighborhoods, Historic Preservation Office is also a Section 106 consulting party, since the City of Seattle is a Certified Local Government (CLG). As consulting parties, these organizations will have the opportunity to comment on the APE, identification of historic properties within the APE, and the determination of adverse effects to historic properties. Further, they will be invited to participate in developing measures to mitigate adverse effect to historic properties, if any are necessary. These organizations will be allotted a 30 day review period to comment.

### **Continuing Consultation**

The APE includes all known structures scheduled for demolition (such as on- and off-ramps), as well as known detours, shooflies, staging, and laydown areas. However, not all locations have been selected at this point. We will certainly consider these areas to be within the APE once they have been determined.

Thank you for your time and attention to this project. We look forward to continuing consultation with you on this project, and to your comments on our proposed APE. **We respectfully request your comments by June 9, 2009.** If you have any questions, please do not hesitate to contact Architectural Historian Connie Walker Gray at 206-716-1138, or [grayc@wsdot.wa.gov](mailto:grayc@wsdot.wa.gov), or Archaeologist Ken Juell at 206-464-1236, or [juellk@wsdot.wa.gov](mailto:juellk@wsdot.wa.gov).

Sincerely,



Julie Meredith, P.E.  
SR 520 Program Director

Cc: Randy Everett, Federal Highway Administration  
Andrea Tull, Sound Transit  
Karen Gordon, City of Seattle Historic Preservation Officer  
Ken Juell, WSDOT UCO Cultural Resources Specialist  
Marsha Tolon, WSDOT 520 Environmental Lead  
Scott Williams, WSDOT Cultural Resources Program Manager

Copies of the following letter #2-8 were sent to the following individuals:

Date	Subject	From	To	Corresp. Ref. No.
7/16/2009	Revised Area of Potential Effects (APE) and Review of Historic Property Inventory Forms I-5 to Medina: SR 520 Bridge Replacement and HOV Project	Marsha Tolon WSDOT Environmental Lead	Beth Dodrill Docomomo WEWA P.O. Box 70245 Seattle, WA 98127	LTR #080
			Tim Ahlers, President Eastlake Community Council 117 E. Louisa Street, PMB #1 Seattle, WA 98102	LTR #081
			Brooks Kolb, President Friends of Seattle's Olmsted Parks P.O. Box 9884 Seattle, WA 98109	LTR #082
			Kitty Henderson Historic Bridge Foundation P.O. Box 66245 Austin, TX 78766	LTR #083
			Eugenia Woo Historic Seattle Preservation Foundation 1117 Minor Avenue Seattle, WA 98101	LTR #084
			Kathleen Brooker Historic Seattle Preservation Foundation 1117 Minor Avenue Seattle, WA 98101	LTR #085
			Charlie Sundberg King Co. Historic Preservation Office 400 Yesler St., Suite 510 Seattle, WA 98104	LTR #086
			John Decker Montlake Community Club 2311 16th Avenue Seattle, WA 98112	LTR #088
			John Gaines, President Portage Bay/Roanoke Community Council 1108 E. Edgar St. Seattle, WA 98102	LTR #089
			Ted Lane Portage Bay/Roanoke Community Council 2600 Harvard Avenue E. Seattle, WA 98102	LTR #090
Erin O'Connor Portage Bay/Roanoke Community Council 2612 10th Ave. E Seattle, WA 98102	LTR #091			

Copies of the following letter #2-8 were sent to the following individuals:

Date	Subject	From	To	Corresp. Ref. No.
7/16/2009	Revised Area of Potential Effects (APE) and Review of Historic Property Inventory Forms I-5 to Medina: SR 520 Bridge Replacement and HOV Project		Commodore C. Fred Roed Seattle Yacht Club 1807 Hamlin St. Seattle, WA 98112	LTR #092
			Kimberly Demuth Seattle Yacht Club c/o Entrix 200 First Ave. W, Ste. 500 Seattle, WA 98119	LTR #093
			Kip Cramer Attn: Carol Englizian Seattle Yacht Club 1807 Hamlin St. Seattle, WA 98112	LTR #094
			Jennifer Flatham Seattle Yacht Club c/o Entrix 200 First Ave. W, Ste. 500 Seattle, WA 98119	LTR #095
			Stephanie Brown The City of Seattle P.O. Box 34996 Seattle, WA 98124	LTR #096
			Karen Gordon The City of Seattle P.O. Box 94649 Seattle, WA 98124-4649	LTR #097
			Chris Moore The Washington Trust for Historic Preservation 1204 Minor Ave Seattle, WA 98101	LTR #098
			Jennifer Meisner The Washington Trust for Historic Preservation 1204 Minor Ave Seattle, WA 98101	LTR #099
			Theresa Doherty Office of Regional Affairs 228 Gerberding Hall Box 351243 Seattle, WA 98195-1243	LTR #100
			Paige Miller Washington Park Arboretum Foundation 2300 Arboretum Drive E. Seattle, WA 98112	LTR #101



Letter #2-8

**RE: Revised Area of Potential Effects (APE) and  
Review of Historic Property Inventory Forms  
I-5 to Medina: SR 520 Bridge Replacement and HOV Project**

Dear

Thank you for your participation as a Section 106 consulting party for the I-5 to Medina: SR 520 Bridge Replacement and HOV Project. This letter conveys information about two important areas of Section 106 coordination with Docomomo WEWA. One is the revised Area of Potential Effects (APE) developed from consulting party comments, and an invitation to parties to review and comment on the results of our historic resource inventory. In this letter, you will find information on the following:

- Revised APE, based on comments and concerns identified by Section 106 consulting parties. See Attachment 1.
- Historic resource inventory within the APE.
- Request for consulting party comments on the historic inventory by July 31, 2009.
- Suggestions for finding more information.
- Next steps for Section 106 consulting parties.
- A summary of historic resource inventory findings within the APE. See Attachment 2.

**Update on the APE**

WSDOT, on behalf of the Federal Highway Administration (FHWA), conducted multiple meetings to get consulting party feedback on the APE for this project. These meetings, as well as letters, emails, and phone calls, generated many comments and requests for changes to the APE. Per provisions outlined in Section 106 of the National Historic Preservation Act (36 CFR 800.16(f)), the Washington State Department of Transportation (WSDOT) has solicited, discussed, and considered the views of all consulting parties regarding the APE, and will continue to consult throughout the duration of the Section 106 process. As a result of this

consultation, WSDOT has adjusted the APE to accommodate many of the recommendations of the consulting parties. Comments on issues not directly related to the APE (such as potential adverse effects or mitigation) will be addressed later in the Section 106 process.

Attachment 1 of this letter includes the revised APE maps and WSDOT's justification for why the APE was or was not altered. Again, we appreciate your participation in the Section 106 process, and your comments on the APE.

### **Historic Resource Inventory within the APE**

As part of the Section 106 process, we provide you the results of our historic resource inventory. WSDOT has evaluated every built environment resource constructed in or before 1971 within the revised APE. A professional architectural historian, who meets the Secretary of Interior Standards qualifications, has evaluated each property per the National Park Service guidelines for potential National Register of Historic Places eligibility. Each resource has been recorded in the Washington State Historic Property Inventory database administered by the Department of Archaeology and Historic Preservation.

The historic property evaluation is based on a "reconnaissance-level" survey, as required by the Department of Archaeology and Historic Preservation, and not every detail about each property is captured. **Please review the Historic Property Inventory forms of interest, returning any comments on the forms to me by Friday, July 31, 2009, using the contact information at the end of this letter.**

### **Comment Instructions**

To help in your review of the inventory information, please refer to Attachment 2: Summary of SR 520 Bridge Replacement and HOV Project Historic Resources Inventory Findings. A reference map is included with the CD containing the Historic Property Inventory forms in PDF format; no paper copies of the forms are available. Please focus your comments according to the two guidelines below:

1. Glaring errors and omissions which may result in a different determination of eligibility; and/or
2. Any information that increases our understanding of a property's historic significance, and may lead to a different determination of eligibility for the National Register of Historic Places.

### **Need more information?**

For additional information on the historic property survey and inventory, you may refer to the following resources:

- Department of Archaeology and Historic Preservation overview of survey and inventory: <http://www.dahp.wa.gov/pages/HistoricSites/Survey.htm>

- The National Park Service guidance on evaluating properties for National Register eligibility: <http://www.nps.gov/history/nr/publications/bulletins/pdfs/nrb15.pdf>

**Next Coordination Steps for Section 106 Consulting Parties**

After review of the Historic Property Inventory forms, WSDOT will assess effects to historic properties and draft potential measures to avoid, minimize and mitigate those effects. The SR 520 project team will involve the consulting parties during this process through fall 2009 and winter 2010.

Thank you for your continuing interest in the project and for joining us as a consulting party. If you have further questions or comments please contact me by phone at 206.770.3613, or by email at [tolomm@wsdot.wa.gov](mailto:tolomm@wsdot.wa.gov).

You can also refer to the SR 520 Bridge Replacement and HOV Project Web site at [www.wsdot.wa.gov/projects/SR520Bridge](http://www.wsdot.wa.gov/projects/SR520Bridge) for updates and information.

Sincerely,



Marsha Tolon  
WSDOT Environmental Lead

Attachments and Enclosures

cc: Jenifer Young, SR 520 Environmental Manager  
Connie Walker Gray, WSDOT Cultural Resources Specialist  
Matthew Sterner, DAHP Transportation Archaeologist  
Scott Williams, WSDOT Cultural Resources Program Manager



## **Attachment 1: Revised Area of Potential Effects**

In May and June 2009, the Washington State Department of Transportation (WSDOT), on behalf of the Federal Highway Administration (FHWA), conducted multiple meetings to get consulting party feedback on the Area of Potential Effects (APE) for the SR 520 Bridge Replacement and HOV Project. These meetings, as well as letters, emails, and phone calls, generated many comments and requests for changes to the APE. Per provisions outlined in Section 106 of the National Historic Preservation Act (36 CFR 800.16(f)), WSDOT has solicited, discussed, and considered the views of all consulting parties regarding the APE, and will continue to consult throughout the duration of the Section 106 process. As a result of this consultation, WSDOT has adjusted the APE to accommodate many of the recommendations of the consulting parties.

Below is a summary of the comments and concerns raised by consulting parties about the APE, and WSDOT's response. The revised APE maps (which include the location and NRHP-eligibility of resources within the APE) are located at the end of the summary.

### **Recommendation that WSDOT include the entire Roanoke Park Historic District within the APE.**

WSDOT has expanded the APE to include the entire historic district within the APE.

### **Recommendation that WSDOT include Lake Washington Boulevard between East Madison Street and 32nd Avenue, as well as Boyer Avenue between 24th Avenue and Lake Washington Boulevard.**

WSDOT does not plan to amend the APE to include these two areas. These areas already have traffic that lead to and from the Lake Washington Boulevard ramps. Compared to existing conditions, there is no potential for traffic to cause an adverse effect in these areas, which currently see heavy traffic volumes. Lake Washington Boulevard, Boyer Avenue, 24th Avenue East (north of Galer) and East Madison Street are all classified by the city of Seattle as arterials. Increased traffic has no potential to constitute an effect on historic properties that may be located on Lake Washington Boulevard between E. Madison Street and 32nd Avenue or Boyer Avenue between 24th Avenue and Lake Washington Boulevard.

**Recommendation that WSDOT expand the APE to include the Rainier Vista viewshed.**

The southwestern-most portion of the Rainier Vista is included in the APE. However, the Rainier Vista was determined not eligible for listing in the National Register of Historic Places in 2003. Although we recognize it as part of the Alaska-Yukon-Pacific Exposition, the Rainier Vista is not a historic property as defined by Section 106 of the National Historic Preservation Act. Therefore, we will not adjust the APE to include the Rainier Vista “Fountain to Mountain” viewshed. Please note that the visual resources section of the project’s environmental impact statement will take into consideration the impact that the project will have on viewsheds and scenic features within the project area.

**Recommendation that all construction staging areas be included in the APE.**

All known staging areas are included within the APE; if additional staging areas are identified, the APE will be modified to account for the new staging areas.

**Recommendation that WSDOT include all known haul routes within the APE.**

WSDOT has adjusted the APE to include haul routes along non-arterial residential streets. This includes areas not yet within the APE, such as E. Shelby and E. Hamlin Streets, between Montlake Boulevard and McCurdy Park. However, the majority of haul routes are on streets that have been defined as arterials by the city of Seattle. This includes haul routes along 24th Avenue East, Montlake Boulevard, NE Pacific Street, Boyer Avenue East, and Harvard Avenue East.

Arterials have been identified by the city of Seattle in order to accommodate more traffic than local streets. Given the current baseline traffic conditions, temporary increases in truck traffic on arterials during construction would not have the potential to cause adverse effects to adjacent historic properties, if any exist.

The effects of construction truck trips on the local arterial system will be relatively minor for all options. With average construction activity, truck trips would range from 1-2 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 per hour under Option K, and 2-12 trips per hour under Option L. The temporary nature of the increased traffic would not have the potential to cause a loss of integrity of the historic properties’ physical characteristics that convey their historic significance.

However, increased truck traffic on local (non-arterial) streets such as E. Shelby and E. Hamlin Streets between 24th Avenue East and McCurdy Park has the potential to cause alterations in the character or use of properties that may be eligible for listing in the National Register of Historic Places. Therefore, we are

now including this area within the APE. Construction truck volumes would increase traffic approximately 10-40 percent on these streets.

WSDOT will be evaluating potential construction impacts from haul routes outside of the Section 106 framework during the NEPA process. If this analysis identifies potential impacts that would result in a loss of integrity to historic properties as defined by Section 106, the APE may be modified to take these impacts into account.

**Recommendation that WSDOT include the entire area of Portage Bay (up to the University Bridge) and the Montlake Cut (to Webster Point), including the grounds just north of the Seattle Yacht Club clubhouse.**

WSDOT will adjust the APE to include the entire navigable waterways of Portage Bay and the entire Montlake Cut, terminating at the eastern end of the Cut. The adjusted APE will not include additional shoreline docks, house boats, bridges, or other structures along the shores of Portage Bay, except for what was already included in the APE submitted in April 2009.

There is no potential to affect the character or use of historic properties as defined by Section 106 in the water east of the Montlake Cut out to Webster Point; therefore, that area is not included in the APE. Further, there is no potential to affect historic properties on or near the grounds north of the Seattle Yacht Club, so that area is also not included within the APE.

As described above, we carefully considered each consulting party comment and evaluated them against project construction and design descriptions. We recognize that we were not able to incorporate every recommendation about the APE. However, when we did not incorporate a comment, we did so after thoughtful evaluation and after concluding that the revised APE, as enclosed in this letter, includes all areas where the character or use of historic properties could potentially be affected by this project.



## **Attachment 2: Summary of Historic Resources Inventory Findings**

To help consulting parties review the results of the historic resources inventory performed for the SR 520 I-5 to Medina: Bridge Replacement and HOV Project, findings from different segments of the Area of Potential Effects (APE) are summarized below.

### **Historic Resource Survey within the APE**

There are five resources within the APE that are listed in the National Register of Historic Places (NRHP): the Montlake Cut/Lake Washington Ship Canal, the Montlake Bridge, the Seattle Yacht Club, the Arboretum Aqueduct/Sewer Trestle, and the Canoe House (Naval Military Hangar-University Shell House) on the University of Washington campus. Since these are listed, we have not prepared HPI forms for these resources (but they are shown in the enclosed table and maps of resources).

Two resources within the APE have been determined eligible for listing in the NRHP by WSDOT within the last year: the James Arnston House (2851 Evergreen Point Road) and the SR 520 Evergreen Point Bridge. An additional resource has been determined not NRHP-eligible by WSDOT in the past year: Helen Pierce House (2857 Evergreen Point Road). DAHP concurred with all three of these determinations. Therefore, we have not included the HPI forms in this submittal.

During the SR 520: I-5 to Medina Bridge Replacement and HOV Project historic resource survey, we identified, evaluated, and recorded 230 resources within the APE that were constructed prior to 1972. These have been documented on the Washington State Historic Property Inventory Database. Of these, 149 are eligible for listing in the NRHP, either individually or as contributing resource to the two NRHP eligible historic districts (Roanoke Park and Montlake). The remaining 81 evaluated resources are not eligible for listing in the NRHP, either individually or as contributing resources to historic districts.

#### *Roanoke Park Historic District*

The nine-block Roanoke Park Historic District is located between E. Shelby Street on the north, 10th Avenue E. on the east, E. Roanoke Street on the south, and Harvard Avenue E. on the west, and is now completely included within the project APE. This district has been determined eligible for listing in the National Register of Historic Places (NRHP), is currently listed in the Washington Heritage Register (WHR), and is likely to be listed in the NRHP in the near future.

Per the direction of Dr. Allyson Brooks in the DAHP/UCO coordination meeting on May 20, 2009, and in a meeting at your office with members of the Portage Bay/Roanoke Park Community Club on May 26, 2009, WSDOT is not recording each individual property within the nine-block Roanoke Park Historic District in the Historic Property Inventory Database. Instead, WSDOT will reference—and include as an appendix in the Cultural Resources report—the NRHP nomination for this resource to assess the character-defining features of the historic property, and then will assess our undertaking's effects on the historic property. Please note, however, that WSDOT has already individually evaluated five historic resources (those closest to the SR 520 right of way) within the Roanoke Park Historic District, and those are included in this submittal. Of these, all five are contributing resources to the NRHP-eligible district, and one is also individually NRHP-eligible.

#### *Montlake Historic District*

The potential Montlake Historic District is generally defined as the area between the Lake Washington Ship Canal to the north, Lake Washington Boulevard to the east, Galer (between Lake Washington Boulevard and 24<sup>th</sup> Avenue East) to the south, Interlaken Boulevard (up to Fuhrman Ave E) to the south and west, and Portage Bay to the north and east. Within the proposed district boundaries, WSDOT evaluated 144 individual resources. 126 properties contribute to the NRHP-eligible district, 35 of which are also individually eligible for listing in the NRHP.

#### *Individually NRHP-eligible Resources Outside of the Historic Districts*

Excluding those properties that are located in potential historic districts, the survey identified 17 individually eligible properties within the APE.



Washington State  
Department of Transportation

## SR 520 Bridge Replacement and HOV Program



I-5 to Medina: Bridge Replacement and HOV Project

**Attachment 3: Historic Property Inventory Forms for all resources constructed prior to 1972.**



Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/ Property Name	Date of Construction	NRHP Status	Comments
1	Harvard Avenue East	1966	1917	Not eligible	Fails to meet any of the four NRHP criteria and has suffered significant loss of integrity
2	Harvard Avenue East	1970	1969	Not eligible	Fails to meet any of the four NRHP criteria and has suffered significant loss of integrity
3	Harvard Avenue East	1978	1901	Not eligible	Fails to meet any of the four NRHP criteria and has suffered significant loss of integrity
4	Harvard Avenue East	1980	1932	Not eligible	Fails to meet any of the four NRHP criteria
5	East Boston Street	806	1925	Not eligible	Fails to meet any of the four NRHP criteria and has suffered loss of integrity
6	East Lynn Street	806	1924	Not eligible	Fails to meet any of the four NRHP criteria and has suffered loss of integrity
7	Harvard Avenue East	2324	1959	Not eligible	Fails to meet any of the four NRHP criteria and has suffered significant loss of integrity
8	Broadway Avenue E	2343	1906	Not eligible	Fails to meet any of the four NRHP criteria and has suffered some loss of integrity
9	Broadway Avenue E	2347	1905	Not eligible	Fails to meet any of the four NRHP criteria and has suffered some loss of integrity
10	Broadway Avenue E	2352 Talder House	1909	Eligible	Eligible under Criterion C
11	Broadway Avenue E	2356	1909	Not eligible	Has suffered loss of integrity
12	East Miller Street	904	1911	Not eligible	Fails to meet any of the four NRHP criteria and has suffered some loss of integrity
13	Broadway Avenue E	2408	1910	Not eligible	Fails to meet any of the four NRHP criteria and has suffered loss of integrity

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/Property Name	Date of Construction	NRHP Status	Comments
14	Broadway Avenue E	2412	1910	Not eligible	Fails to meet any of the four NRHP criteria and has suffered loss of integrity
15	East Miller Street	910	1905	Not Eligible	Fails to meet any of the four NRHP criteria
16	East Miller Street	914	1910	Not Eligible	Fails to meet any of the four NRHP criteria and has suffered loss of integrity
17	10th Avenue E	2351	1930	Not eligible	Fails to meet any of the four NRHP criteria and has suffered some loss of integrity
18	10th Avenue E	2401	1909	Not Eligible	Fails to meet any of the four NRHP criteria and has suffered significant loss of integrity
19	10th Avenue E	2405	1909	Not Eligible	Fails to meet any of the four NRHP criteria
20	10th Avenue E	2409	1921	Not Eligible	Fails to meet any of the four NRHP criteria and has suffered significant loss of integrity
21	10th Avenue E	2413-15	1957; 1905	Not eligible	(two buildings – 1905 and 1957) Fails to meet any of the four NRHP criteria and has suffered significant loss of integrity
22	10th Avenue E	2400	1932	Not eligible	Fails to meet any of the four NRHP criteria and has suffered some loss of integrity
23	10th Avenue E	2406-08	1962	Not eligible	Fails to meet any of the four NRHP criteria
24	10th Avenue E	2412	1910	Not eligible	Fails to meet any of the four NRHP criteria
25	Federal Avenue E	2422	1907	Not eligible	Fails to meet any of the four NRHP criteria and has suffered some loss of integrity
26	11 <sup>th</sup> Avenue E	2423-2425	1910	Not eligible	Fails to meet any of the four NRHP criteria and has suffered some loss of integrity

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/ Property Name	Date of Construction	NRHP Status	Comments
27	10th Avenue E	Overpass	1962	Not Eligible	Fails to meet any of the four NRHP criteria
28	Delmar Drive E	Overpass	1962	Not Eligible	Fails to meet any of the four NRHP criteria
29	Boyer Avenue E	Overpass	1962	Not Eligible	Fails to meet any of the four NRHP criteria
30	Delmar Drive E	Bagley View Point	1908; 1970	Not Eligible	Has suffered a significant loss of integrity
31	Between 11 <sup>th</sup> and 12 <sup>th</sup> Avenue	Roanoke steps	1908	Not Eligible	Fails to meet any of the four NRHP criteria
32	Boyer Avenue E	2545 Alden Mason House	1949	Eligible	Eligible under Criterion C; Potentially eligible Seattle Landmark
33	Boyer Avenue E	2542	1957	Not eligible	Fails to meet any of the four NRHP criteria
34	Boyer Avenue E	2534	1911	Not Eligible	Fails to meet any of the four NRHP criteria and has suffered a significant loss of integrity
35	Boyer Avenue E	2524 Portage Bay condominu ms	1958	Not Eligible	Fails to meet any of the four NRHP criteria
36	Boyer Avenue E	2518 Kelley House	1909	Eligible	Eligible under Criterion C
37	East Roanoke Street	901 Fire Station #22	1965	Eligible	Two buildings on one parcel; Outside of boundaries and period of significance for Roanoke Park historic district; Fire Station #22 is eligible under Criterion C
37	East Roanoke Street	901 Freeway Control Office Building	1965	Not eligible	Two buildings on one parcel; Outside of boundaries and period of significance for Roanoke Park district; Freeway Control Office Building fails to meet any of the four NRHP criteria and has suffered loss of integrity

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/ Property Name	Date of Construction	NRHP Status	Comments
38	Boylston Avenue E.	2515 Denny-Fuhrman (Seward) School	1893; 1899; 1905; 1917	Eligible	Three buildings - Eligible under Criteria A & C  Designated Seattle Landmark; 1893/99 building is also listed on the WHR
39	Boylston Avenue E.	2603 Crawford Apartments	1917	Not eligible	Has suffered significant loss of integrity
40	Boylston Avenue E.	2607	1914	Not eligible	Has suffered significant loss of integrity
41	Boylston Avenue E.	2611	1914	Not eligible	Fails to meet any of the four NRHP criteria
42	Boylston Avenue E.	2815 Shelby Apartments	1928	Eligible	Eligible under Criterion C – Multiple Property Nomination for Seattle Apartment Buildings, 1900-1957
43	Franklin Avenue E	2847 Gilmore House	1907	Eligible	Eligible under Criterion C
44	Franklin Avenue E	2901 L' Amourita Apartments	1909	Eligible	Eligible under Criterion C - Multiple Property Nomination for Seattle Apartment Buildings, 1900-1957  Designated Seattle Landmark
45	Franklin Avenue E	2919 Franklin Apartments	1927	Eligible	Eligible under Criterion C - Multiple Property Nomination for Seattle Apartment Buildings, 1900-1957
46	Franklin Avenue E	2923 Franklin Apartments	1927	Eligible	Eligible under Criterion C - Multiple Property Nomination for Seattle Apartment Buildings, 1900-1957
47	Franklin Avenue E	2927	1930	Not eligible	Fails to meet any of the four NRHP criteria and has suffered significant loss of integrity
48	East Roanoke Street	Roanoke Park Historic	various	Eligible	Eligible under Criteria A and C; Listed in the WHR;  (Additional HPI forms not

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/ Property Name	Date of Construction	NRHP Status	Comments
		District			completed for this district)
49	Harvard Avenue E	2612	1909	Contributing <sup>1</sup>	Contributing to Roanoke Park potential historic district
50	Broadway Ave E	2601	1912	Contributing	Contributing to Roanoke Park potential historic district
51	East Roanoke Street	950 Roanoke Park	1908	Contributing	Contributing to Roanoke Park potential historic district
52	East Roanoke Street	1004	1907	Contributing	Contributing to Roanoke Park potential historic district
53	East Roanoke Street	1018	1909	Contributing Eligible	Contributing to Roanoke Park potential historic district; Individually eligible under Criterion C
54	East Roanoke Street	1106	1965	Not eligible	Fails to meet any of the four NRHP criteria
55	East Roanoke Street	1118	1940	Not eligible	Fails to meet any of the four NRHP criteria and has suffered loss of integrity
56	Boyer Avenue E	2608 Queen City Yacht Club	1938	Not eligible	Has suffered a loss of integrity
57	Lake Washington Ship Canal	Montlake Cut	1916	Listed	Listed in the NRHP [Chittenden Locks and Related Features of the Lake Washington Ship Canal multiple property listing]; listed in the WHR; designated Seattle Landmark (No HPI form completed)
58	Montlake Boulevard NE over Lake Washington Ship Canal	Montlake Bridge	1924	Listed	Listed in the NRHP [Historic Bridges/Tunnels in Washington State]; listed in the WHR; designated Seattle Landmark

<sup>1</sup> "Contributing" denotes those buildings that comprise a historic district, even though they may lack individual distinction, because they contribute to the character of the district. These components must possess integrity individually, as well as add to the district's integrity.

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/ Property Name	Date of Construction	NRHP Status	Comments
					(No HPI form completed)
59	East Hamlin Street	1807 Seattle Yacht Club - Main Station	1919	Listed	Listed in the NRHP; listed in the WHR; designated Seattle Landmark (No HPI form completed)
60	Montlake Boulevard NE	2723 NOAA Northwest Fisheries Science Center	1931	Contributing Eligible	Five buildings – 1931, 1939, 1940, 1965, 1966. 1931 building only - Contributing to Montlake potential historic district; Individually eligible for NRHP under Criteria A & C; Potentially eligible as a Seattle Landmark
			1939; 1940; 1965; 1966	Not contributing	1939 building - Not contributing to Montlake potential historic district - has suffered substantial loss of integrity 1940 - Not contributing to Montlake potential historic district - has suffered loss of integrity 1965, 1966 buildings - Not contributing to Montlake potential historic district – outside of period of significance
61	East Hamlin Street	1891	1919	Contributing	Contributing to Montlake potential historic district
62	East Hamlin Street	1893	1932	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
63	East Hamlin Street	1885	1941	Contributing	Contributing to Montlake potential historic district
64	East Hamlin Street	1888	1920	Contributing	Contributing to Montlake potential historic district
65	East Hamlin Street	1896	1925	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
66	Montlake Boulevard NE	2809	1922	Contributing	Contributing to Montlake potential historic district

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/Property Name	Date of Construction	NRHP Status	Comments
67	Montlake Boulevard NE	2815	1914	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
68	East Shelby Street	1897	1926	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
69	East Shelby Street	1887	1922	Contributing	Contributing to Montlake potential historic district
70	East Shelby Street	1894	1937	Contributing	Contributing to Montlake potential historic district
71	Montlake Boulevard NE	2907	1942	Not contributing	Not contributing to Montlake potential historic district - has suffered substantial loss of integrity
72	Montlake Boulevard NE	2908	1921	Contributing	Contributing to Montlake potential historic district
73	Montlake Boulevard NE	2904	1921	Contributing	Contributing to Montlake potential historic district
74	East Shelby Street	2112	1921	Contributing	Contributing to Montlake potential historic district
75	East Shelby Street	2118	1926	Contributing	Contributing to Montlake potential historic district
76	East Shelby Street	2122	1934	Contributing	Contributing to Montlake potential historic district
77	East Shelby Street	2126	1915	Contributing	Contributing to Montlake potential historic district
78	East Shelby Street	2132	1955	Not contributing	Not contributing to Montlake potential historic district – outside of period of significance and has suffered loss of integrity
79	East Shelby Street	2136	1931	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
80	East Shelby Street	2142	1925	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/ Property Name	Date of Construction	NRHP Status	Comments
81	East Shelby Street	2146	1921	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
82	East Shelby Street	2152	1915	Contributing	Contributing to Montlake potential historic district
83	East Shelby Street	2158	1925	Contributing Eligible	Contributing to Montlake potential historic district
84	East Shelby Street	2159 Mary Houlahan House	1914	Contributing Eligible	Contributing to Montlake potential historic district; Individually eligible under Criterion C Designed by Bebb and Gould
85	East Park Drive East	2817	1914; 1940	Contributing	(2 buildings – 1940, 1914) Contributing to Montlake potential historic district
86	East Shelby Street	2153	1970	Not contributing	Not contributing to Montlake potential historic district – outside of period of significance
87	East Shelby Street	2147	1926	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
88	East Shelby Street	2143	1923	Contributing	Contributing to Montlake potential historic district
89	East Shelby Street	2137	1923	Contributing	Contributing to Montlake potential historic district
90	East Shelby Street	2133	1920	Contributing	Contributing to Montlake potential historic district
91	East Shelby Street	2127	1920	Contributing	Contributing to Montlake potential historic district
92	East Shelby Street	2121	1925	Contributing	Contributing to Montlake potential historic district
93	East Shelby Street	2117	1926	Contributing	Contributing to Montlake potential historic district
94	East Shelby Street	2111	1925	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/ Property Name	Date of Construction	NRHP Status	Comments
95	Montlake Boulevard NE	2818	1920	Contributing	Contributing to Montlake potential historic district
96	Montlake Boulevard NE	2812	1922	Contributing	Contributing to Montlake potential historic district
97	Montlake Boulevard NE	2810	1915	Contributing	Contributing to Montlake potential historic district
98	East Hamlin Street	2110	1924	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
99	East Hamlin Street	2112	1915	Contributing	Contributing to Montlake potential historic district
100	East Hamlin Street	2122	1926	Contributing	Contributing to Montlake potential historic district
101	East Hamlin Street	2128	1922	Contributing	Contributing to Montlake potential historic district
102	East Hamlin Street	2130	1922	Contributing	Contributing to Montlake potential historic district
103	East Hamlin Street	2136	1926	Contributing	Contributing to Montlake potential historic district
104	East Hamlin Street	2142	1949	Contributing	Contributing to Montlake potential historic district
105	East Hamlin Street	2146	1920	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
106	East Hamlin Street	2150	1930	Contributing	Contributing to Montlake potential historic district
107	East Hamlin Street	2160	1920	Contributing	Contributing to Montlake potential historic district
108	Lake Washington Blvd. E	2720 (aka 2161 E. Hamlin St.)  Museum of History and Industry (MOHAI)	1950-52	Contributing	Contributing to Montlake potential historic district
109	East Hamlin Street	2151	1923	Contributing	Contributing to Montlake potential historic district

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/ Property Name	Date of Construction	NRHP Status	Comments
110	East Hamlin Street	2147	1924	Contributing	Contributing to Montlake potential historic district
111	East Hamlin Street	2141	1923	Contributing	Contributing to Montlake potential historic district
112	East Hamlin Street	2137	1925	Contributing	Contributing to Montlake potential historic district
113	East Hamlin Street	2133	1919	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
114	East Hamlin Street	2127	1924	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
115	East Hamlin Street	2121	1927	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
116	East Hamlin Street	2117	1914	Contributing	Contributing to Montlake potential historic district
117	East Hamlin Street	2111	1925	Contributing	Contributing to Montlake potential historic district
118	Montlake Boulevard NE	2740	1920	Not Contributing	Not contributing to Montlake potential historic district - has suffered substantial loss of integrity
119	Montlake Boulevard NE	2734	1919	Contributing	Contributing to Montlake potential historic district
120	East Montlake Place East	2625 Union 76 Service Station	1952	Not contributing	Not contributing to Montlake potential historic district - has suffered substantial loss of integrity
121	22nd Avenue East	2605 Hop In Grocery	1937	Not contributing	Not contributing to Montlake potential historic district - has suffered significant loss of integrity
122	West Montlake Place East	2575	1951	Contributing	Contributing to Montlake potential historic district;
123	West Montlake Place East	2571	1938	Contributing	Contributing to Montlake potential historic district;

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/ Property Name	Date of Construction	NRHP Status	Comments
124	West Montlake Place East	2563	1937	Not contributing	Not contributing to Montlake potential historic district - has suffered substantial loss of integrity
125	West Montlake Place East	2553	1936	Contributing	Contributing to Montlake potential historic district;
126	West Montlake Place East	2521	1937	Contributing	Contributing to Montlake potential historic district;
127	West Montlake Place East	2511	1931	Contributing Eligible	Contributing to Montlake potential historic district; Individually eligible under Criterion C
128	West Montlake Place East	2507	1929	Contributing	Contributing to Montlake potential historic district;
129	West Montlake Place East	2501	1931	Contributing Eligible	Contributing to Montlake potential historic district; Individually eligible under Criterion C
130	East Calhoun Street	1618 Montlake Community Center	1935	Contributing Eligible	Contributing to Montlake potential historic district; Individually eligible under Criteria A & C Designated Seattle Landmark
131	20th Avenue East	2552	1937	Contributing	Contributing to Montlake potential historic district
132	West Montlake Place East	2564	1947	Contributing	Contributing to Montlake potential historic district;
133	East Roanoke Street	2009	1950	Contributing	Contributing to Montlake potential historic district
134	East Roanoke Street	2015	1949	Not contributing	Not contributing to Montlake potential historic district - has suffered substantial loss of integrity
135	East Roanoke Street	2023	1952	Contributing	Contributing to Montlake potential historic district
136	22nd Avenue East	2565	1962	Not contributing	Not contributing to Montlake potential historic district - outside of period of significance for Montlake historic district and has suffered significant loss of integrity

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/Property Name	Date of Construction	NRHP Status	Comments
137	East Roanoke Street	2201	1910	Not contributing	Not contributing to Montlake potential historic district - has suffered substantial loss of integrity
138	East Roanoke Street	2205	1947	Not contributing	Not contributing to Montlake potential historic district - has suffered substantial loss of integrity
139	East Roanoke Street	2209	1921	Contributing	Contributing to Montlake potential historic district
140	East Montlake Place East	2571	1951	Contributing	Contributing to Montlake potential historic district
141	East Louisa Street	2216	1922	Not contributing	Not contributing to Montlake potential historic district - has suffered substantial loss of integrity
142	East Louisa Street	2220	1930	Contributing Eligible	Contributing to Montlake potential historic district; Individually eligible under Criterion C
143	East Louisa Street	2226	1926	Contributing	Contributing to Montlake potential historic district;
144	24th Avenue East	2515	1933	Contributing	Contributing to Montlake potential historic district
145	East Miller Street	2230	1954	Not Contributing	Not contributing to Montlake potential historic district – outside of period of significance and has suffered loss of integrity
146	East Miller Street	2233	1934	Contributing	Contributing to Montlake potential historic district
147	24th Avenue East	2459	1934	Contributing	Contributing to Montlake potential historic district
148	24th Avenue East	2455	1939	Contributing	Contributing to Montlake potential historic district
149	24th Avenue East	2415	1924	Contributing	Contributing to Montlake potential historic district
150	24th Avenue East	2402	1920	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/Property Name	Date of Construction	NRHP Status	Comments
151	24th Avenue East	2412	1919	Contributing	Contributing to Montlake potential historic district
152	24th Avenue East	2416	1919	Contributing	Contributing to Montlake potential historic district
153	East Calhoun Street	2406	1939	Contributing	Contributing to Montlake potential historic district
154	24th Avenue East	2456	1922	Contributing	Contributing to Montlake potential historic district
155	24th Avenue East	2466	1920	Contributing	Contributing to Montlake potential historic district
156	24th Avenue East	2502	1921	Contributing	Contributing to Montlake potential historic district
157	24th Avenue East	2506	1920	Contributing	Contributing to Montlake potential historic district
158	24th Avenue East	2512	1920	Contributing	Contributing to Montlake potential historic district
159	24th Avenue East	2516	1925	Contributing	Contributing to Montlake potential historic district
160	East Louisa Street	2400	1924	Contributing	Contributing to Montlake potential historic district;
161	24th Avenue East	2556	1925	Contributing	Contributing to Montlake potential historic district
162	24th Avenue East	2553	1959	Not contributing	Not contributing to Montlake potential historic district - outside of period of significance for Montlake historic district
163	East Roanoke Street	2251	1959	Not contributing	Not contributing to Montlake potential historic district - outside period of significance
164	East Montlake Place East	2600	1926	Contributing Eligible	Contributing to Montlake potential historic district; Individually eligible under Criterion C
165	East Montlake Place East	2604	1926	Contributing Eligible	Contributing to Montlake potential historic district; Individually eligible under Criterion C

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/ Property Name	Date of Construction	NRHP Status	Comments
166	East Montlake Place East	2610	1926	Contributing Eligible	Contributing to Montlake potential historic district; Individually eligible under Criterion C
167	East Montlake Place East	2616	1938	Contributing	Contributing to Montlake potential historic district
168	Lake Washington Blvd. E	2209	1925	Contributing	Contributing to Montlake potential historic district
169	Lake Washington Blvd. E	2215	1937	Contributing	Contributing to Montlake potential historic district
170	Lake Washington Blvd. E	2219	1929	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
171	Lake Washington Blvd. E	2223	1928	Contributing	Contributing to Montlake potential historic district
172	Lake Washington Blvd. E	2227	1925	Contributing	Contributing to Montlake potential historic district
173	Lake Washington Blvd. E	2231	1927	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
174	24th Avenue East	2616	1926	Contributing	Contributing to Montlake potential historic district
175	Lake Washington Blvd. E	2401	1930	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
176	Lake Washington Blvd. E	2409	1920	Contributing	Contributing to Montlake potential historic district
177	Lake Washington Blvd. E	2415	1922	Contributing	Contributing to Montlake potential historic district
178	Lake Washington Blvd. E	2419	1935	Contributing	Contributing to Montlake potential historic district

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/Property Name	Date of Construction	NRHP Status	Comments
179	Lake Washington Blvd. E	2425	1931	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
180	Lake Washington Blvd. E	2429	1931	Contributing	Contributing to Montlake potential historic district
181	Lake Washington Blvd. E	2433	1930	Contributing	Contributing to Montlake potential historic district
182	Lake Washington Blvd. E	2437	1930	Contributing	Contributing to Montlake potential historic district
183	Lake Washington Blvd. E	2441	1927	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
184	Lake Washington Blvd. E	2445	1927	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
185	Lake Washington Blvd. E	2449	1928	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
186	Lake Washington Blvd. E	2455	1926	Contributing	Contributing to Montlake potential historic district
187	Lake Washington Blvd. E	2459	1927	Contributing	Contributing to Montlake potential historic district
188	Lake Washington Blvd. E	2465	1927	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C
189	Lake Washington Blvd. E	2615	1946	Contributing	Contributing to Montlake potential historic district
190	Lake Washington Blvd. E	2607	1926	Contributing	Contributing to Montlake potential historic district
191	East Roanoke Street	2603	1930	Contributing	Contributing to Montlake potential historic district;

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/ Property Name	Date of Construction	NRHP Status	Comments
				Eligible	Individually eligible under Criterion C
192	East Roanoke Street	2559	1928	Contributing	Contributing to Montlake potential historic district
193	Lake Washington Blvd. E	2537	1928	Contributing	Contributing to Montlake potential historic district
194	Lake Washington Blvd. E	2531	1926	Not contributing	Not contributing to Montlake potential historic district - has suffered substantial loss of integrity
195	Lake Washington Blvd. E	2525	1927	Not contributing	Not contributing to Montlake potential historic district - has suffered substantial loss of integrity
196	Lake Washington Blvd. E	2521	1946	Contributing	Contributing to Montlake potential historic district
197	Lake Washington Blvd. E	2517	1947	Contributing	Contributing to Montlake potential historic district
198	Lake Washington Blvd. E	2511	1948	Contributing	Contributing to Montlake potential historic district
199	East Miller Street	2530	1945	Not Contributing	Not contributing to Montlake potential historic district - has suffered substantial loss of integrity
200	26 <sup>th</sup> Avenue East	2467	1926	Contributing	Contributing to Montlake potential historic district
201	26 <sup>th</sup> Avenue East	2463	1925	Contributing	Contributing to Montlake potential historic district
202	26 <sup>th</sup> Avenue East	2457	1932	Contributing	Contributing to Montlake potential historic district
203	26 <sup>th</sup> Avenue East	2451	1930	Contributing Eligible	Contributing to Montlake potential historic district Individually eligible under Criterion C

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/Property Name	Date of Construction	NRHP Status	Comments
204	Arboretum Dr E	2300 Washington Park Arboretum	1903	Eligible	Eligible under Criteria B and C; Includes Arboretum Aqueduct (1912) - Listed in the NRHP [Historic Bridges/Tunnels in Washington State], listed in the WHR, designated Seattle Landmark; and Seattle Japanese Garden (1960) - Designated Seattle Landmark
205	Lake Washington Boulevard in the Washington Park Arboretum	Arboretum Aqueduct aka Arboretum Sewer Trestle	1912	Listed	Listed in the NRHP [Historic Bridges/Tunnels in Washington State]; listed in the WHR; designated Seattle Landmark (No HPI form completed)
206	Lake Washington	Governor Albert D. Rosellini Bridge/ Evergreen Point Bridge	1960-63	Determined Eligible	Eligible under Criteria A and C, and Criteria Consideration G (No HPI form completed)
207	University of Washington	Naval Military Hangar - University Shell House (Canoe House)	1918	Listed	Listed in the NRHP; listed in the WHR (No HPI form completed)
208	1925-59 NE Pacific St. University of Washington Campus	University of Washington Medical Center & Magnuson Health Sciences Building/UW School of Medicine	1947-1973 (and later additions)	Not eligible	Has suffered a significant loss of integrity
209	University of Washington	Rainier Vista	1906-09	Determined Not Eligible	Has suffered a significant loss of integrity

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/Property Name	Date of Construction	NRHP Status	Comments
210	Campus	Husky Stadium	1920 (with later alterations)	Not eligible	Has suffered a significant loss of integrity
211		Bank of America Arena at Hec Edmundson Pavilion	1928	Not eligible	Has suffered a significant loss of integrity
212		Husky Pool	1939	Not eligible	Fails to meet any of the four NRHP criteria
213		Pedestrian Bridge	1938	Not eligible	Fails to meet any of the four NRHP criteria
214		Bloedel Hall	1971	Eligible	Eligible under Criterion C
215		Winkenwerder Forest Lab	1963	Eligible	Eligible under Criterion C
216		Wilson Ceramics Lab	1946	Not eligible	Fails to meet any of the four NRHP criteria and has suffered loss of integrity
217		Wilcox Hall	1963	Not eligible	Fails to meet any of the four NRHP criteria
218		More Hall	1946-48	Not eligible	Fails to meet any of the four NRHP criteria
219		More Hall Annex (former Nuclear Reactor Building)	1961	Eligible	Eligible under Criteria A and C; Listed in the WHR
220		Power Plant	1909	Not eligible	Has suffered a significant loss of integrity
221		Plant Operation Annexes 2 - 4	1947; 1956; 1909	Not eligible	Has suffered a significant loss of integrity
222		University of Washington Club	1960	Eligible	Eligible under Criterion C

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/ Property Name	Date of Construction	NRHP Status	Comments
223		McMahon Hall	1965	Eligible	Eligible under Criterion C
224		CENPA Instrument Shop	1948	Not eligible	Fails to meet any of the four NRHP criteria
225		North Physics Laboratory	1949	Not eligible	Fails to meet any of the four NRHP criteria
226		Burke Gilman Trail	1978	Not eligible	Has suffered a significant loss of integrity
227	42nd Avenue E	2411 Edgewater Condominiums	1938-40	Eligible	Eligible under Criterion C - Multiple Property Nomination for Seattle Apartment Buildings, 1900-1957
228	Evergreen Point Road	3267	1952	Not eligible	Fails to meet any of the four NRHP criteria
229		3261	1941	Not eligible	Fails to meet any of the four NRHP criteria and has suffered loss of integrity
230		3201	1960	Not eligible	Fails to meet any of the four NRHP criteria and has suffered loss of integrity
231		3205	1920	Not eligible	Fails to meet any of the four NRHP criteria and has suffered loss of integrity
232		2857 Helen Pierce House	1920, 1932	Not eligible	Determined not eligible for the NRHP due to alterations causing a loss of integrity, but eligible for the WHR – SHPO concurred on April 15, 2009. (No HPI form included)
233		2849	1935	Not eligible	Fails to meet any of the four NRHP criteria and has suffered loss of integrity
234		2841	1914	Not eligible	Fails to meet any of the four NRHP criteria and has suffered loss of integrity
235		2851 James Arntson	1953	Eligible	Determined eligible for the NRHP under Criterion C – SHPO concurred on April

Summary of Pre-1972 Properties Surveyed in APE

Property ID	Street Name/Location	Street Address/ Property Name	Date of Construction	NRHP Status	Comments
		House			15, 2009. (No HPI form included)
236		2837	1956	Not eligible	Fails to meet any of the four NRHP criteria and has suffered loss of integrity
237		2651	1958	Not eligible	Fails to meet any of the four NRHP criteria and has suffered significant loss of integrity
238		2617	1947	Not eligible	Fails to meet any of the four NRHP criteria and has suffered significant loss of integrity

**A copy of the following letter #2-4 was sent to the following individual:**

<b>Date</b>	<b>Subject</b>	<b>From</b>	<b>To</b>	<b>Corresp. Ref. No.</b>
8/27/2009	Revised Area of Potential Effects Comments SR 520 Bridge Replacement and HOV Project	Marsh Tolon WSDOT Environmental Lead	Jon H. Decker Montlake Community Club 2311 16th Avenue East Seattle, WA 98112	LTR #114





Letter #2-4

**RE: Revised Area of Potential Effects Comments  
SR 520 Bridge Replacement and HOV Project**

Dear

Thank you for your letter dated July 30, 2009 and review comments regarding the revised Area of Potential Effect (APE) and property inventory information for the SR 520 Bridge Replacement and HOV Project. Following are our responses to your paraphrased questions. I hope you will find our response adequate, and will contact us if further questions arise.

*1. Request for specific information on the potential construction process occurring in the Montlake Community regarding:*

*a. St. Demetrious Church Fall Festival*

Thank you for the reminder to consider how construction activities may affect the annual Fall Festival and to devise ways to either avoid or minimize potential effects. While the church is not included in the APE, any potential effects that construction activities may pose to the Fall Festival at St. Demetrious Church would be considered as part of the proposed project.

*b. The inclusion of West Montlake Park and adjacent properties on East Hamlin and East Shelby Streets, and areas east to Montlake Boulevard East, in the APE.*

The areas you have defined are part of the eligible Montlake Historic District, which is regarded as one discrete resource. Project activities that cause effect to any part of the district would be viewed as an effect to the district as a whole or as one resource. The APE is drawn with a conservative hand because it encompasses the proposed construction limits and the immediately adjacent properties, which is an area that is inventoried and surveyed. Since parts of the district are already included within the APE, and the district is one historic resource, effects to the entire district would be considered as part of the project analysis. Yet, by drawing the APE close to the

construction limit boundary, WSDOT conserves public funds because it reduces the amount of time and resources spent to inventory properties not likely to be affected by proposed project activities. Elimination of redundancy is always a winning situation.

- c. *The inclusion of the Montlake Historic Business District on 24<sup>th</sup> Avenue East extending south from McGraw Street to Lynn Street in the APE. Address future access during construction to and from Montlake School during school hours in the proposed Memorandum of Agreement (MOA).*

Similar to the reasons outlined in the response for question “b” above, the historic business district on 24<sup>th</sup> Avenue East will not be included in the APE. However, WSDOT can keep in mind the planning of construction activities to avoid or reduce access conflict with Montlake School during school hours as part of the overall project. If at any time additional construction staging areas are identified in the Montlake area, the APE would be revised to include those areas.

Thank you for your continued participation in this project, and commitment to the Montlake Historic District resources. If you have further questions or comments please contact me by phone at 206.770.3613, or by email at [tolonm@wsdot.wa.gov](mailto:tolonm@wsdot.wa.gov).

You can also refer to the SR 520 Bridge Replacement and HOV Project Web site at [www.wsdot.wa.gov/projects/SR520Bridge](http://www.wsdot.wa.gov/projects/SR520Bridge) for updates and information.

Sincerely,



Marsha Tolon  
WSDOT Environmental Lead

cc: Anita Bowers, MCC President  
Jenifer Young, SR 520 Environmental Manager  
Connie Walker Gray, WSDOT Cultural Resources Specialist

**A copy of the following letter #2-5 was sent to the following individual:**

<b>Date</b>	<b>Subject</b>	<b>From</b>	<b>To</b>	<b>Coersp. Ref. No.</b>
8/27/2009	Revised Area of Potential Effects Comments SR 520 Bridge Replacement and HOV Project	Marsh Tolon WSDOT Environmental Lead	Larry Sinnott Friends of Seattle's Olmsted Parks 7043 21st Avenue NE Seattle, WA 98115	LTR #112



**Letter #2-5**

**RE: Revised Area of Potential Effects Comments  
SR 520 Bridge Replacement and HOV Project**

Dear

Thank you for your email dated July 31, 2009. In reference to your recent phone discussion with the SR 520 Project Architectural Historian Lori Durio, we regret that we had not addressed the issue of Lake Washington Boulevard as an individual historic resource. Not responding to you on this particular issue was an oversight on our end; please accept our apology. Lori will be working with you and gathering information to determine whether or not Lake Washington Boulevard serves as an individual historic resource.

Thank you in advance for your participation in this project, and for your commitment to Olmsted resources in Seattle. If you have further questions or comments please contact me by phone at 206.770.3613, or by email at [tolonm@wsdot.wa.gov](mailto:tolonm@wsdot.wa.gov).

You can also refer to the SR 520 Bridge Replacement and HOV Project Web site at [www.wsdot.wa.gov/projects/SR520Bridge](http://www.wsdot.wa.gov/projects/SR520Bridge) for updates and information.

Sincerely,



Marsha Tolon  
WSDOT Environmental Lead

cc: Charlie Sundberg, FSOP  
Jenifer Young, SR 520 Environmental Manager  
Connie Walker Gray, WSDOT Cultural Resources Specialist



**A copy of the following letter #2-6 was sent to the following individual:**

<b>Date</b>	<b>Subject</b>	<b>From</b>	<b>To</b>	<b>Corresp. Ref. No.</b>
8/27/2009	Revised Area of Potential Effects Comments SR 520 Bridge Replacement and HOV Project	Marsh Tolon WSDOT Environmental Lead	Eugenia Woo Director of Preservation Services Historic Seattle 1117 Minor Avenue Seattle, WA 98101	LTR #113





Letter #2-6

**RE: Revised Area of Potential Effects Comments  
SR 520 Bridge Replacement and HOV Project**

Dear

Thank you for your participation as a Section 106 consulting party for the SR 520 I-5 to Medina Bridge Replacement and HOV project. We appreciate your comments on the Historic Property Inventory forms in your letter dated July 31, 2009. Below please find our responses to your comments.

1. Thank you for alerting us about the missing photos for 2561, 2837, and 3201 Evergreen Point Road. Enclosed please find updated forms, with pictures, for those properties.
2. Thank you very much for the additional information about 2810 Montlake Boulevard NE. We will integrate this information into the statement of significance. In addition, according to the King County Assessor's Database, the property address is 2810 Montlake Boulevard NE (not E). We recognize it is confusing, because the street name there is "Montlake Boulevard E." However, we will continue to reference the King County Assessor's property nomenclature.
3. Thank you for the update on the NRHP status of the More Hall Annex (UW Nuclear Reactor) Building. At the time we completed the HPI form, it had not yet been accepted for listing in the NRHP. We have contacted Michael Houser at DAHP to ascertain the current status of the NRHP listing of the More Hall Annex Building.
4. Thank you for alerting us about the pedestrian bridges on Montlake Boulevard NE. We will record those and make determinations of NRHP eligibility. We will submit those to you for comment.
5. Regarding the use of the Historic Property Inventory form National Register Opinion Determination, it is our understanding that listing contributing resources to a potential historic district such as MOHAI (and others) as NRHP eligible is appropriate. As noted on page 46 of the DAHP Database User's Manual, selecting yes "will indicate to DAHP staff that the property may merit consideration for National Register eligibility."

(<http://www.dahp.wa.gov/pages/HistoricSites/documents/UserManual2005.pdf>) This would appear to apply for resources that are either individually eligible, or contributing to an eligible historic district. In the statement of significance, we indicate whether a property is individually eligible or contributing, or both. We do plan to follow up with Megan Duvall for clarification, and will let you know if there are any differences in opinion.

Thank you again for your feedback. We look forward to talking to you soon about potential effects to historic properties. If you have further questions or comments please contact me by phone at 206.770.3613, or by email at [tolonm@wsdot.wa.gov](mailto:tolonm@wsdot.wa.gov).

You can also refer to the SR 520 Bridge Replacement and HOV Project Web site at [www.wsdot.wa.gov/projects/SR520Bridge](http://www.wsdot.wa.gov/projects/SR520Bridge) for updates and information.

Sincerely,



Marsha Tolon  
WSDOT Environmental Lead

Enclosures

cc: Kathleen Brooker, Executive Director Historic Seattle  
Jenifer Young, SR 520 Environmental Manager  
Connie Walker Gray, WSDOT Cultural Resources Specialist

**A Copy of the following letter #2-7 was sent to the following individual:**

<b>Date</b>	<b>Subject</b>	<b>From</b>	<b>To</b>	<b>Corresp. Ref. No.</b>
8/27/2009	Revised Area of Potential Effects Comments SR 520 Bridge Replacement and HOV Project	Marsh Tolon WSDOT Environmental Lead	C. Fred Roed, Commodore 1807 East Hamlin Street Seattle Yacht Club Seattle, WA 98112	LTR #115





Letter #2-7

**RE: Revised Area of Potential Effects Comments  
SR 520 Bridge Replacement and HOV Project**

Dear

Thank you for your letter dated July 30, 2009, regarding the revised Area of Potential Effects (APE) for the SR 520, I-5 to Medina Replacement and HOV Project. We very much appreciate your time and interest in this project as a Section 106 consulting party. We would like to take this opportunity to respond to your remaining comments on the APE.

First, we would like to clarify the areas within Portage Bay that are included in the APE. As the map illustrates, the APE will include the entire Seattle Yacht Club parcel, including the in-water facilities (the docks, piers, and foreshore). As described in our July 16 letter to consulting parties, the revised APE "... Will not include...structures along the shores of Portage Bay, except for what was already included in the APE submitted in April 2009." The entire Seattle Yacht Club property was included in the April 2009 APE, and it continues to be included in the revised APE. I hope this resolves your concern on this issue.

Second, thank you for expressing your concern that the West Montlake Park is not included in the APE. Per your July 30 letter, you are concerned that "...this area would be utilized as a staging area of construction and would then have significant visual impacts, as well as increased dirt and noise, at our historic property and impede our ability to function in our traditional manner. We are also concerned that access [to] our docks and piers would be restricted." I want to assure you that there is no plan to use West Montlake Park as a construction staging area, or to store equipment there, or to affect that property in any way whatsoever with any Option or Sub option. Parks and open space are protected by restrictive federal, state, and local regulations, and while WSDOT generally avoids using park properties for construction staging, the APE would always be drawn to include such areas. Therefore,

there is no potential that this undertaking would affect a historic property on that parcel. Therefore, it is not included in the APE.

Thank you again for your thoughtful comments regarding the Seattle Yacht Club as a historic property. We look forward to continuing consultation with you. If you have further questions or comments please contact me by phone at 206.770.3613, or by email at [tolonm@wsdot.wa.gov](mailto:tolonm@wsdot.wa.gov).

You can also refer to the SR 520 Bridge Replacement and HOV Project Web site at [www.wsdot.wa.gov/projects/SR520Bridge](http://www.wsdot.wa.gov/projects/SR520Bridge) for updates and information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Marsha Tolon", written in black ink on a light-colored background.

Marsha Tolon  
WSDOT Environmental Lead

Enclosure

cc: Jack A. Austin, SYC  
Jenifer Young, SR 520 Environmental Manager  
Connie Walker Gray, WSDOT Cultural Resources Specialist

**Copies of the following letter were sent to the following individuals:**

Date	Subject	From	To	Corresp. Ref. No.
6/10/2010	SR 520 Bridge Replacement and HOV Project, Seattle, King County, Revised Area of Potential Effects	Julie Meredith SR 520 Program Director WSDOT	<p>Beth Dodrill DOCOMOMO WEWA P.O. Box 70245 Seattle, WA 98127</p> <p>Tim Ahlers Eastlake Community Council 117 E. Louisa St, PMB #1 Seattle, WA 98102</p> <p>Brooks Kolb Friends of Seattle's Olmsted Parks P.O. Box 9884 Seattle, WA 98109</p> <p>Kitty Henderson Historic Bridge Foundation P.O. Box 66245 Austin, TX 78766</p> <p>Eugenia Woo Historic Seattle Preservation Foundation 1117 Minor Avenue Seattle, WA 98101</p> <p>Kathleen Brooker Historic Seattle Preservation Foundation 1117 Minor Avenue Seattle, WA 98101</p> <p>Charlie Sundberg King County Historic Preservation Office 400 Yesler St, Suite 510 Seattle, WA 98104</p> <p>John Decker Montlake Community Council 2311 16<sup>th</sup> Avenue Seattle, WA 98112</p> <p>Jim Herkelrath National Oceanic &amp; Atmospheric Administration 7600 Sand Point Way NE Seattle, WA 98115-0070</p> <p>John Gaines Portage Bay/Roanoke Community Club 1108 E Edgar St. Seattle, WA 98102</p> <p>Ted Lane Portage Bay/Roanoke Community Club 2600 Harvard Ave E Seattle, WA 98102</p>	<p>LTR #1071</p> <p>LTR #1072</p> <p>LTR #1073</p> <p>LTR #1074</p> <p>LTR #1075</p> <p>LTR #1076</p> <p>LTR #1077</p> <p>LTR #1079</p> <p>LTR #1080</p> <p>LTR #1082</p> <p>LTR #1083</p>

**Copies of the following letter were sent to the following individuals:**

Date	Subject	From	To	Corresp. Ref. No.
6/10/2010	SR 520 Bridge Replacement and HOV Project, Seattle, King County, Revised Area of Potential Effects	Julie Meredith SR 520 Program Director WSDOT	Erin O'Conner Portage Bay/Roanoke Community Club 2612 10 <sup>th</sup> Ave E Seattle, WA 98102	LTR #1084
			Kimberly Demuth Seattle Yacht Club 200 1 <sup>st</sup> Ave W, Suite 500 Seattle, WA 98119	LTR #1085
			C. Fred Roed, Commodore Seattle Yacht Club 1807 Hamlin St Seattle, WA 98112	LTR #1087
			Kip Cramer, Chairman Seattle Yacht Club 1807 Hamlin St Seattle, WA 98112	LTR #1088
			Stephanie Brown SR 520 Project Liaison The City of Seattle P.O. Box 34996 Seattle, WA 98124	LTR #1089
			Karen Gordon The City of Seattle P.O. Box 94649 Seattle, WA 98124-4649	LTR #1090
			Jennifer Meisner The Washington Trust for Historic Preservation 1204 Minor Avenue Seattle, WA 98101	LTR #1091
			Chris Moore The Washington Trust for Historic Preservation 1204 Minor Avenue Seattle, WA 98101	LTR #1092
			Theresa Doherty The University of Washington 228 Gerberding Hall Box 351243 Seattle, WA 98195-1243	LTR #1093
			Paige Miller Washington Park Arboretum Foundation 2300 Arboretum Drive E Seattle, WA 98112	LTR #1094



**Washington State  
Department of Transportation**

**Paula J. Hammond, P.E.**  
Secretary of Transportation

**Engineering and Regional Operations**  
SR 520 Bridge Replacement and HOV Program  
600 Stewart Street, Suite 520  
Seattle, WA 98101

Phone: 206-770-3500  
Fax: 206-770-3569  
TTY: 1-800-833-6388  
[www.wsdot.wa.gov/Projects/SR520Bridge](http://www.wsdot.wa.gov/Projects/SR520Bridge)

June 10, 2010

**RE: SR 520, I-5 to Medina Bridge Replacement Project and HOV Project  
Revised Area of Potential Effects**

Dear

We appreciate the time and work you are dedicating to this project as a consulting party. By this letter, the Washington State Department of Transportation (WSDOT), on behalf of the Federal Highway Administration (FHWA), is continuing Section 106 consultation per the provisions of 36 CFR Part 800 to revise the Area of Potential Effects (APE). In response to comments and concerns raised by our Section 106 consulting parties and following multiple conversations with the SHPO, we have expanded the APE. The revised APE, as shown on the enclosed map, expands the APE that the State Historic Preservation Officer (SHPO) concurred with on August 27, 2009.

The revised APE now includes all potential construction haul routes, potential park mitigation sites for Section 6(f) compliance, and a relocated stormwater site. The revised APE includes all historic (pre-1972) resources abutting the haul routes along Seattle city streets. Where haul routes occur on the I-5 or SR 520 mainline, the APE does not include abutting parcels because additional temporary truck traffic on an Interstate or State Highway would have no potential to affect adjacent historic properties. Where haul routes occur on access roads to the I-5 or SR 520 mainline, the APE does include abutting parcels.

Project construction engineers identified all potential haul routes on Seattle city streets for all aspects of the project, and took into account known project work sites and likely materials procurement and disposal areas, given the current knowledge and best information available at this stage of the project. In the very unlikely event that new haul routes outside of this APE are identified, WSDOT will address potential effects to historic properties along these new haul routes through provisions outlined in the forthcoming Section 106 Programmatic Agreement (PA) for this project.

Within the areas captured by the expanded APE WSDOT will conduct a survey and inventory of all historic (pre-1972) resources not already surveyed as part of the August 27, 2009 APE. In July, we plan to submit determinations of eligibility for all resources not previously surveyed to the SHPO. There will be approximately 400 new Historic Property Inventory (HPI) forms associated with this effort. Due to the large number of forms anticipated (approximately 400), if you wish to receive a copy of the forms, please let us know and WSDOT will provide you with a CD containing all the HPI forms for your review. The review period for these determinations of National Register eligibility will be limited to two weeks. Subsequent to the identification of historic properties along haul routes, WSDOT will be assessing whether the undertaking would adversely affect any of these properties, and will present this analysis in the revised Cultural Resources Discipline Report.

Thank you again for your time and attention to this project. We look forward to continuing consultation with you on this project. If you have any questions, please do not hesitate to contact Marsha Tolon at 206-521-5571, or by email [tolonm@wsdot.wa.gov](mailto:tolonm@wsdot.wa.gov).

Sincerely,



Julie Meredith  
SR 520 Program Director

cc: Randy Everett, FHWA  
Matthew Sterner, DAHP  
Allison Hanson, WSDOT  
Rob Berman, SR 520  
Marsha Tolon, WSDOT

**Copies of the following letter were sent to the following individuals:**

<b>Date</b>	<b>Subject</b>	<b>From</b>	<b>To</b>	<b>Corresp. Ref. No.</b>
7/21/2010	SR 520 Bridge Replacement and HOV Project, Seattle, King County, Invitation to Participate as a Section 106 Consulting Party	Julie Meredith SR 520 Program Director WSDOT	Pegeen Shean North Capitol Hill Neighborhood Association 2419 E Federal Avenue Seattle, WA 98102-4033	LTR #1496





**Washington State  
Department of Transportation**

**Paula J. Hammond, P.E.**  
Secretary of Transportation

**Engineering and Regional Operations**  
**SR 520 Bridge Replacement and HOV Program**  
600 Stewart Street, Suite 520  
Seattle, WA 98101

Phone: 206-770-3500  
Fax: 206-770-3569  
TTY: 1-800-833-6388  
[www.wsdot.wa.gov/Projects/SR520Bridge](http://www.wsdot.wa.gov/Projects/SR520Bridge)

July 21, 2010

Y-8393 BH  
LTR #1496

Pegeen Shean  
President  
c/o Nancy Brainard, SR 520 Committee  
North Capitol Hill Neighborhood Association  
2419 E. Federal Avenue  
Seattle, WA 98102-4033

**RE: Invitation to participate as a Section 106 Consulting Party  
SR 520, I-5 to Medina Bridge Replacement and HOV Project**

Dear Mr. Shean,

The Washington State Department of Transportation (WSDOT), on behalf of the Federal Highway Administration (FHWA), invites the North Capitol Hill Neighborhood Association to participate in Section 106 consultation for the SR 520, I-5 to Medina Bridge Replacement and HOV Project per 36 Code of Federal Regulations (CFR) 800.2(c)(5)(d)(i). We are currently consulting with identified groups and organizations that have interest in historic properties as defined by Section 106, which may be adversely affected by the preferred alternative for the proposed project.

Since the U.S. Department of Transportation is granting funds through FHWA for this project, amended Section 106 of the National Historic Preservation Act applies (23 CFR 800). Section 106 requires federal agencies to identify historic properties that could be affected by their undertakings, and to evaluate the effects of their undertakings on those historic properties and to consult with concerned parties and tribes. WSDOT assists FHWA in fulfilling obligations under Section 106 by documenting the evaluation in a report, which is submitted to the State Historic Preservation Officer (SHPO) for concurrence.

**Consulting Party Role**

Your participation as a consulting party is invited because North Capitol Hill Neighborhood Association has expressed an interest in this project, and adjoining neighborhoods have suggested that you may have a particular interest in the project's potential adverse effects on historic properties as defined by Section 106. The consultation process should encourage creativity and a common-sense approach to problem solving. Further, Section 106:

- Is a process and discussion.

- Does not necessarily result in preservation.
- Seeks to integrate consideration of historic preservation in balancing a full range of public values.

Consulting party status entitles your organization to weigh in on aspects of this project that would potentially affect historic properties, or those resources that are listed or eligible for listing in the National Register of Historic Places. As a consulting party, your organization would have the opportunity to comment on amendments to the Area of Potential Effects (APE), identification of historic properties within the APE, and the determination of adverse effects to historic properties. Further, you would be invited to participate in developing measures to mitigate adverse effects to historic properties, if any are necessary.

Your organization would have an opportunity to receive and review pertinent information, offer ideas, and consider possible solutions together with WSDOT and other consulting parties. Review periods for Section 106 consulting parties are not specifically established in the regulations. However, the SHPO and tribes are allotted a **30 day review period**, and WSDOT plans to follow this protocol for all consulting parties whenever we are able. Please note that Section 106 consulting party status deals specifically with historic properties: those buildings, structures, objects, sites, and districts that are listed in or eligible for listing in the National Register of Historic Places.

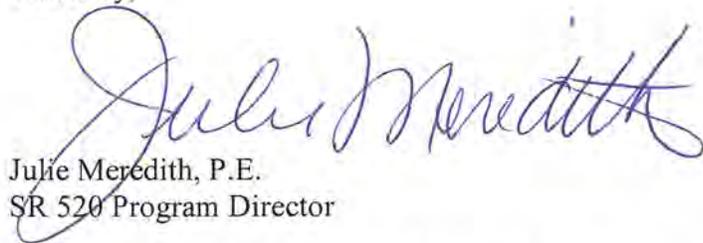
Currently, the next step in the Section 106 process is a series of individual consulting party organizations meetings with two consultants to the state, Terry Klein and Lynne Sebastian, PhD of the SRI Foundation during July and August 2010. At these meetings Mr. Klein and Dr. Sebastian will work with your organization to identify concerns about specific effects on the integrity of historic properties that could result from construction and operation of the SR 520 project. This information will be compiled and provided to WSDOT project staff to help inform the WSDOT/FHWA decision about the effects of this project on historic properties. The enclosed section of National Register Bulletin 15 on evaluating historic properties discusses the integrity of historic properties, which is the key issue in the Section 106 effects determination. This guidance is provided to assist your organization in responding to the question: Will the project diminish the integrity of any of the affected historic properties? Whether written or verbal, your organization's response to this question is the subject of the current consultation step.

If your organization accepts the invitation to become a Consulting Party under Section 106, we will contact you to arrange a meeting or telephone conference at your convenience.

If you are concerned about other aspects of the project, but not specifically historic properties, you will have ample opportunity to get involved during the NEPA process. Please contact Marsha Tolon, SR 520 Environmental Lead, by phone at 206.521.5571, or by email at [tolonm@wsdot.wa.gov](mailto:tolonm@wsdot.wa.gov) to help determine how you can get involved.

If the North Capitol Hill Neighborhood Association elects to participate in the project as a Consulting Party, **please return your response using the attached form by Wednesday, July 28, 2010.** If you have any questions or would like learn more about the project, please consult the SR 520 Bridge Replacement and HOV Project Web site at [www.wsdot.wa.gov/projects/SR520Bridge](http://www.wsdot.wa.gov/projects/SR520Bridge) .

Sincerely,

A handwritten signature in blue ink that reads "Julie Meredith". The signature is fluid and cursive, with the first name "Julie" being larger and more prominent than the last name "Meredith".

Julie Meredith, P.E.  
SR 520 Program Director

Enclosures: Draft 2 Consulting Party Plan, FEIS Proposed Haul Route Map, and NRHP Bulletin 15 Section on Integrity of Historic Properties.

cc: Dr. Allyson Brooks, SHPO  
Randall Everett, FHWA Mega Projects Engineer  
Jenifer Young, SR 520 Environmental Manager  
Marsha Tolon, WSDOT Environmental Lead

## SR 520, I-5 to Medina Bridge Replacement and HOV Project Section 106 Consulting Party Designation

The Washington State Department of Transportation (WSDOT), on behalf of the Federal Highway Administration (FHWA), invites the North Capitol Hill Neighborhood Association to participate in Section 106 consultation for the SR 520, I-5 to Medina Bridge Replacement and HOV Project per 36 Code of Federal Regulations (CFR) 800.2(c)(5)(d)(i).

The consultation process, if approached in good faith, should encourage creativity and a common-sense approach to problem solving. As a process and discussion avenue, Section 106 seeks to integrate consideration of historic preservation in balancing a full range of public values, though it does not necessarily result in preservation.

Consulting party points of involvement per Section 106 regulations include:

1. Area of Potential Affects (APE) establishment
2. Historic Property identification
3. During and at determination of effect(s)
4. In case of SHPO/THPO (Tribal Historic Preservation Officer) objection
5. During mitigation measures development

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**Please circle your response and sign as indicated.**

We, the North Capitol Hill Neighborhood Association, **accept** / **decline** to participate in Section 106 consultation for the SR 520, I-5 to Medina Bridge Replacement and HOV Project per 36 Code of Federal Regulations (CFR) 800.2(c)(5)(d)(i).

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*Signature*

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*Date*

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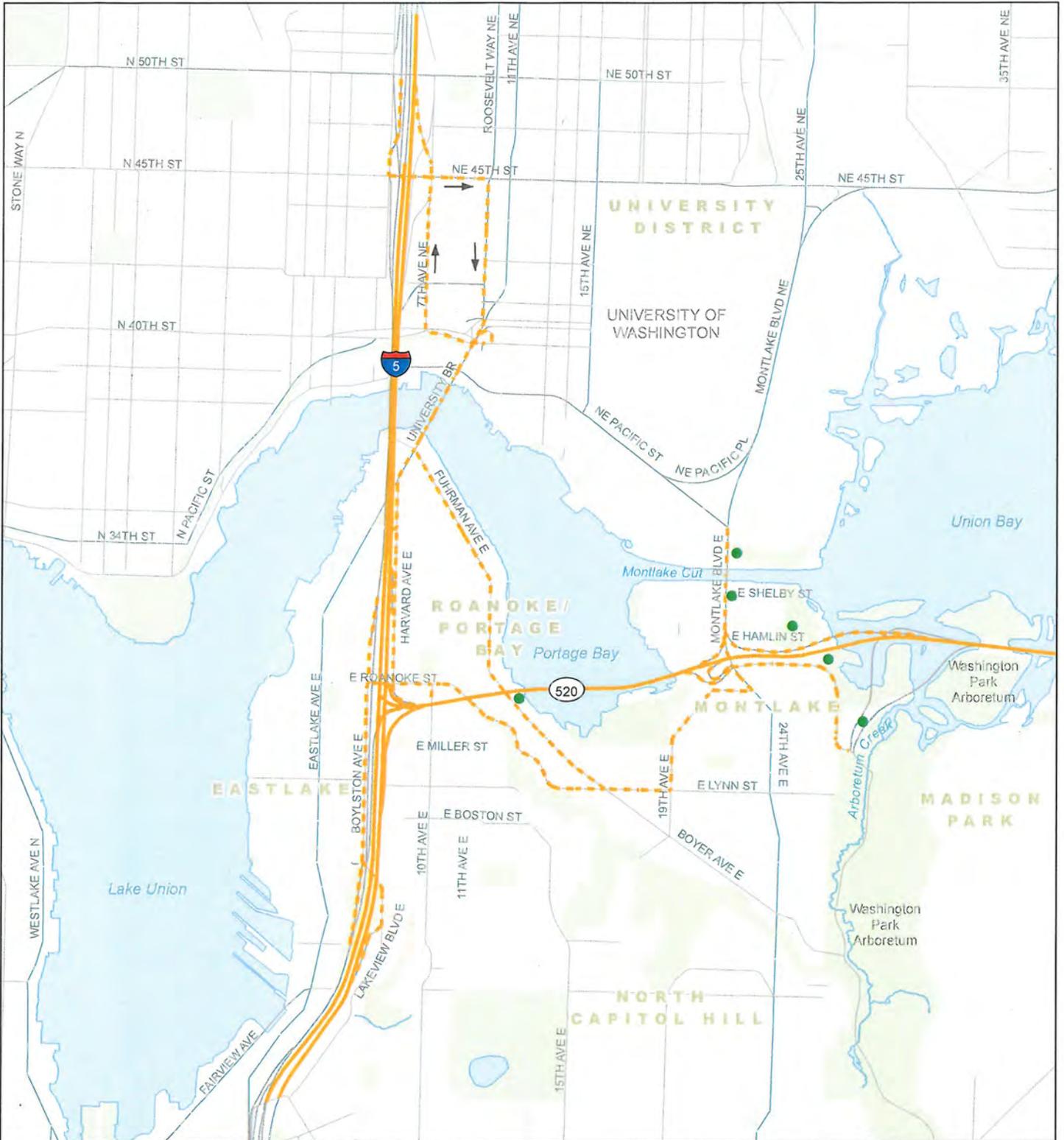
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*Print Title*

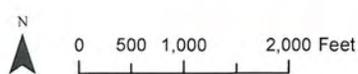
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**Comment:**



- Potential Staging Area
- Haul Route-Project Duration
- - - Haul Route-Limited Duration

**DRAFT**



Source: King County (2005) GIS Data (Streams and Streets), King County (2007) GIS Data (Water Bodies), CH2M HILL (2008) GIS Data (Parks). Horizontal datum for all layers is NAD83(91); vertical datum for layers is NAVD88.

**Potential Haul Routes**

I-5 to Medina: Bridge Replacement and HOV Project

## Section 106 Consultation Plan for SR 520 I-5 to Medina Project

*Note: most dates are approximations*

<b>Meeting for all non-tribal consulting parties (CPs)</b>	<b>July 8, 2010</b>
Topics: WSDOT/FHWA commitment to Section 106 process Present and discuss design details, preferred alternative Review and discuss what is known about the construction process Discuss consultation plan	
<b>Collect comments from CPs on effects of the project</b>	<b>July 14-August 17</b>
SRI Foundation staff (SRIF) works with consulting parties to identify specific concerns about effects to historic properties; provides compiled comments with recommendations to WSDOT for consideration in Section 106 effects finding	
<b>CP meetings with SRIF to discuss resolution of adverse effect</b>	<b>week of Sept 13</b>
SRIF meets with each consulting party group individually to collect ideas about measures to avoid, minimize, or mitigate adverse effects	
<b>Draft list of possible measures to resolve adverse effects to CPs</b>	<b>September 29</b>
SRIF compiles list of possible measures, secures approval of WSDOT and distributes to CPs	
<b>Draft Final CR report with effects determinations available for CP review</b>	<b>October 5</b>
<b>Meeting of all CPs</b>	<b>October 13</b>
Topics: Project design refinements Effects findings in draft final CR report Measures to resolve adverse effects Programmatic agreement process	
<b>First draft of effects resolution concept plan* to CPs</b>	<b>October 29</b>
<b>CP comments on draft final CR report due</b>	<b>November 4</b>
<b>Meeting on effects resolution concept plan</b>	<b>November 17</b>

*\* The effects resolution concept plan will form the basis for the Section 106 programmatic agreement. We anticipate consulting on two drafts of this concept plan before the end of the year, with a draft PA to be developed early in 2011.*

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# VIII. HOW TO EVALUATE THE INTEGRITY OF A PROPERTY

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## INTRODUCTION

**Integrity is the ability of a property to convey its significance.** To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity. The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance.

Historic properties either retain integrity (this is, convey their significance) or they do not. Within the concept of integrity, the National Register criteria recognizes seven aspects or qualities that, in various combinations, define integrity.

To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining *which* of these aspects are most important to a particular property requires knowing why, where, and when the property is significant. The following sections define the seven aspects and explain how they combine to produce integrity.

## SEVEN ASPECTS OF INTEGRITY

- Location
- Design
- Setting
- Materials
- Workmanship
- Feeling
- Association

## UNDERSTANDING THE ASPECTS OF INTEGRITY

### LOCATION

**Location is the place where the historic property was constructed or the place where the historic event occurred.** The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons. Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved. (See Criteria Consideration B in *Part VII: How to Apply the Criteria Considerations*, for the conditions under which a moved property can be eligible.)

## DESIGN

**Design is the combination of elements that create the form, plan, space, structure, and style of a property.** It results from conscious decisions made during the original conception and planning of a property (or its significant alteration) and applies to activities as diverse as community planning, engineering, architecture, and landscape architecture. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials.

A property's design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount, and style of ornamental detailing; and arrangement and type of plantings in a designed landscape.

Design can also apply to districts, whether they are important primarily for historic association, architectural value, information potential, or a combination thereof. For districts significant primarily for historic association or architectural value, design concerns more than just the individual buildings or structures located within the boundaries. It also applies to the way in which buildings, sites, or structures are related: for example, spatial relationships between major features; visual rhythms in a streetscape or landscape plantings; the layout and materials of walkways and roads; and the relationship of other features, such as statues, water fountains, and archeological sites.

## SETTING

**Setting is the physical environment of a historic property.** Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the *character* of the place in which the property played its historical role. It involves *how*, not just *where*, the property is situated and its relationship to surrounding features and open space.

Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's concept of nature and aesthetic preferences.

The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as:

- Topographic features (a gorge or the crest of a hill);
- Vegetation;
- Simple manmade features (paths or fences); and
- Relationships between buildings and other features or open space.

These features and their relationships should be examined not only within the exact boundaries of the property, but also between the property and its *surroundings*. This is particularly important for districts.

## MATERIALS

**Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.** The choice and combination of materials reveal the preferences of those who created the property and indicate the availability of particular types of materials and technologies. Indigenous materials are often the focus of regional building traditions and thereby help define an area's sense of time and place.

A property must retain the key exterior materials dating from the period of its historic significance. If the property has been rehabilitated, the historic materials and significant features must have been preserved. The property must also be an actual historic resource, not a recreation; a

recent structure fabricated to look historic is not eligible. Likewise, a property whose historic features and materials have been lost and then reconstructed is usually not eligible. (See Criteria Consideration E in *Part VII: How to Apply the Criteria Considerations* for the conditions under which a reconstructed property can be eligible.)

## WORKMANSHIP

**Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.** It is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site. Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques.

Workmanship is important because it can furnish evidence of the technology of a craft, illustrate the aesthetic principles of a historic or prehistoric period, and reveal individual, local, regional, or national applications of both technological practices and aesthetic principles. Examples of workmanship in historic buildings include tooling, carving, painting, graining, turning, and joinery. Examples of workmanship in prehistoric contexts include Paleo-Indian clovis projectile points; Archaic period beveled adzes; Hopewellian birdstone pipes; copper earspools and worked bone pendants; and Iroquoian effigy pipes.

## FEELING

**Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.** It results from the presence of physical features that, taken together, convey the property's historic character. For example, a rural historic district retaining original design, materials, workmanship, and setting will relate the feeling of agricultural life in the 19th century. A grouping of prehistoric petroglyphs, unmarred by graffiti and intrusions and located on its original isolated bluff, can evoke a sense of tribal spiritual life.

## ASSOCIATION

**Association is the direct link between an important historic event or person and a historic property.** A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. For example, a Revolutionary War battlefield whose natural and manmade elements have remained intact since the 18th century will retain its quality of association with the battle.

Because feeling and association depend on individual perceptions, their retention *alone* is never sufficient to support eligibility of a property for the National Register.

## ASSESSING INTEGRITY IN PROPERTIES

Integrity is based on significance: why, where, and when a property is important. Only after significance is fully established can you proceed to the issue of integrity.

The steps in assessing integrity are:

- Define the **essential physical features** that must be present for a property to represent its significance.
- Determine whether the **essential physical features are visible** enough to convey their significance.
- Determine whether the property needs to be **compared with similar properties**. And,
- Determine, based on the significance and essential physical features, **which aspects of integrity** are particularly vital to the property being nominated and if they are present.

Ultimately, the question of integrity is answered by whether or not the property retains the **identity** for which it is significant.

## DEFINING THE ESSENTIAL PHYSICAL FEATURES

All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. The essential physical features are those features that define both *why* a property is significant (Applicable Criteria and Areas of Significance) and *when* it was significant (Periods of Significance). They are the features without which a property can no longer be identified as, for instance, a late 19th century dairy barn or an early 20th century commercial district.

### CRITERIA A AND B

A property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s). If the property is a site (such as a treaty site) where there are no material cultural remains, the setting must be intact.

Archeological sites eligible under Criteria A and B must be in overall good condition with excellent preservation of features, artifacts, and spatial relationships to the extent that these remains are able to convey important associations with events or persons.

### CRITERION C

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique. A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.

Archeological sites eligible under Criterion C must be in overall good condition with excellent preservation

of features, artifacts, and spatial relationships to the extent that these remains are able to illustrate a site type, time period, method of construction, or work of a master.

### CRITERION D

For properties eligible under Criterion D, including archeological sites and standing structures studied for their information potential, less attention is given to their overall condition, than it they were being considered under Criteria A, B, or C. Archeological sites, in particular, do not exist today exactly as they were formed. There are always cultural and natural processes that alter the deposited materials and their spatial relationships.

For properties eligible under Criterion D, integrity is based upon the property's potential to yield specific data that addresses important research questions, such as those identified in the historic context documentation in the Statewide Comprehensive Preservation Plan or in the research design for projects meeting the *Secretary of the Interior's Standards for Archeological Documentation*.

### INTERIORS

Some historic buildings are virtually defined by their exteriors, and their contribution to the built environment can be appreciated even if their interiors are not accessible. Examples of this would include early examples of steel-framed skyscraper construction. The great advance in American technology and engineering made by these buildings can be read from the outside. The change in American popular taste during the 19th century, from the symmetry and simplicity of architectural styles based on classical precedents, to the expressions of High Victorian styles, with their combination of textures, colors, and asymmetrical forms, is readily apparent from the exteriors of these buildings.

Other buildings "are" interiors. The Cleveland Arcade, that soaring 19th century glass-covered shopping area, can only be appreciated from the inside. Other buildings in this category would be the great covered train sheds of the 19th century.

In some cases the loss of an interior will disqualify properties from listing

in the National Register—a historic concert hall noted for the beauty of its auditorium and its fine acoustic qualities would be the type of property that if it were to lose its interior, it would lose its value as a historic resource. In other cases, the overarching significance of a property's exterior can overcome the adverse effect of the loss of an interior.

In borderline cases particular attention is paid to the significance of the property and the remaining historic features.

### HISTORIC DISTRICTS

For a district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. In addition, the relationships among the district's components must be substantially unchanged since the period of significance.

When evaluating the impact of intrusions upon the district's integrity, take into consideration the relative number, size, scale, design, and location of the components that do not contribute to the significance. A district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment.

A component of a district cannot contribute to the significance if:

- it has been substantially altered since the period of the district's significance *or*
- it does not share the historic associations of the district.

### VISIBILITY OF PHYSICAL FEATURES

Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction. Archeological properties are often the exception to this; by nature they usually do not require visible features to convey their significance.

## NON-HISTORIC EXTERIORS

If the historic *exterior* building material is covered by non-historic material (such as modern siding), the property can still be eligible *if* the significant form, features, and detailing are not obscured. If a property's exterior is covered by a non-historic false-front or curtain wall, the property will not qualify under Criteria A, B, or C, because it does not retain the visual quality necessary to convey historic or architectural significance. Such a property also cannot be considered a contributing element in a historic district, because it does not add to the district's sense of time and place. If the false front, curtain wall, or non-historic siding is removed and the original building materials are intact, then the property's integrity can be re-evaluated.

## PROPERTY CONTAINED WITHIN ANOTHER PROPERTY

Some properties contain an earlier structure that formed the nucleus for later construction. The exterior property, if not eligible in its own right, can qualify on the basis of the interior property *only if* the interior property can yield significant information about a specific construction technique or material, such as rammed earth or tabby. The interior property *cannot* be used as the basis for eligibility if it has been so altered that it no longer contains the features that could provide important information, or if the presence of important information cannot be demonstrated.

## SUNKEN VESSELS

A sunken vessel can be eligible under Criterion C as embodying the distinctive characteristics of a method of construction if it is structurally intact. A *deteriorated* sunken vessel, no longer structurally intact, can be eligible under Criterion D if the remains of either the vessel or its contents is capable of yielding significant information. For further information, refer to *National Register Bulletin: Nominating Historic Vessels and Shipwrecks to the National Register of Historic Places*.

### Natural Features

A natural feature that is associated with a historic event or trend, such as a rock formation that served as a trail marker during westward expansion, must retain its historic appearance, unobscured by modern construction or landfill. Otherwise it is not eligible, even though it remains intact.

## COMPARING SIMILAR PROPERTIES

For some properties, comparison with similar properties should be considered during the evaluation of integrity. Such comparison may be important in deciding what physical features are essential to properties of that type. In instances where it has not been determined what physical features a property must possess in order for it to reflect the significance of a historic context, comparison with similar properties should be undertaken during the evaluation of integrity. This situation arises when scholarly work has not been done on a particular property type or when surviving examples of a property type are extremely rare. (See **Comparing Related Properties** in *Part V: How to Evaluate a Property within its Historic Context*.)

## RARE EXAMPLES OF A PROPERTY TYPE

Comparative information is particularly important to consider when evaluating the integrity of a property that is a rare surviving example of its type. The property must have the essential physical features that enable it to convey its historic character or information. The rarity and poor condition, however, of other extant examples of the type may justify accepting a greater degree of alteration or fewer features, provided that enough of the property survives for it to be a significant resource.

### Eligible

- A one-room schoolhouse that has had all original exterior siding replaced and a replacement roof that does not exactly replicate the original roof profile can be eligible if the other extant rare examples have received an even greater degree of alteration, such as the subdivision of the original one-room plan.

### Not Eligible

- A mill site contains information on how site patterning reflects historic functional requirements, but parts of the site have been destroyed. The site is not eligible for its information potential if a comparison of other mill sites reveals more intact properties with complete information.

## DETERMINING THE RELEVANT ASPECTS OF INTEGRITY

Each type of property depends on certain aspects of integrity, more than others, to express its historic significance. Determining which of the aspects is most important to a particular property requires an understanding of the property's significance and its essential physical features.

### CRITERIA A AND B

A property important for association with an event, historical pattern, or person(s) ideally might retain *some* features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, might not be as important to the significance, and would not be relevant if the property were a site. A basic integrity test for a property associated with an important event or person is whether a historical contemporary would recognize the property as it exists today.

For archeological sites that are eligible under Criteria A and B, the seven aspects of integrity can be applied in much the same way as they are to buildings, structures, or objects. It is important to note, however, that the site must have *demonstrated* its ability to convey its significance, as opposed to sites eligible under Criterion D where only the potential to yield information is required.

#### Eligible

A mid-19th century waterpowered mill important for its association with an area's industrial development is eligible if:

- it is still on its original site (**Location**), and
- the important features of its setting are intact (**Setting**), and
- it retains most of its historic materials (**Materials**), and
- it has the basic features expressive of its design and function, such as configuration, proportions, and window pattern (**Design**).

#### Not Eligible

A mid-19th century water-powered mill important for its association with an area's industrial development is not eligible if:

- it has been moved (**Location, Setting, Feeling, and Association**), or
- substantial amounts of new materials have been incorporated (**Materials, Workmanship, and Feeling**), or
- it no longer retains basic design features that convey its historic appearance or function (**Design, Workmanship, and Feeling**).

### CRITERION C

A property significant under Criterion C must retain those physical features that characterize the type, period, or method of construction that the property represents. Retention of design, workmanship, and materials will usually be more important than location, setting, feeling, and association. Location and setting will be important, however, for those properties whose design is a reflection of their immediate environment (such as designed landscapes and bridges).

For archeological sites that are eligible under Criterion C, the seven aspects of integrity can be applied in much the same way as they are to buildings, structures, or objects. It is important to note, however, that the site must have *demonstrated* its ability to convey its significance, as opposed to sites eligible under Criterion D where only the *potential* to yield information is required.

#### Eligible

A 19th century wooden covered bridge, important for illustrating a construction type, is eligible if:

- the essential features of its design are intact, such as abutments, piers, roof configuration, and trusses (**Design, Workmanship, and Feeling**), and
- most of the historic materials are present (**Materials, Workmanship, and Feeling**), and
- evidence of the craft of wooden bridge technology remains, such as the form and assembly technique of the trusses (**Workmanship**).
- Since the design of a bridge relates directly to its function as a transportation crossing, it is also important that the bridge still be situated over a waterway (**Setting, Location, Feeling, and Association**).

#### Not Eligible

For a 19th century wooden covered bridge, important for its construction type, replacement of some materials of the flooring, siding, and roofing would not necessarily damage its integrity. Integrity would be lost, however, if:

- the abutments, piers, or trusses were substantially altered (**Design, Workmanship, and Feeling**) or
- considerable amounts of new materials were incorporated (**Materials, Workmanship, and Feeling**).
- Because environment is a strong factor in the design of this property type, the bridge would also be ineligible if it no longer stood in a place that conveyed its function as a crossing (**Setting, Location, Feeling, and Association**).

## CRITERION D

For properties eligible under Criterion D, setting and feeling may not have direct bearing on the property's ability to yield important information. Evaluation of integrity probably will focus primarily on the location, design, materials, and perhaps workmanship.

### Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns can be eligible if:

- floral or faunal remains are found in clear association with cultural material (**Materials** and **Association**) and
- the site exhibits stratigraphic separation of cultural components (**Location**).

### Not Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns would not be eligible if:

- floral or faunal remains were so badly decomposed as to make identification impossible (**Materials**), or
- floral or faunal remains were disturbed in such a manner as to make their association with cultural remains ambiguous (**Association**), or
- the site has lost its stratigraphic context due to subsequent land alterations (**Location**).

### Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period can be eligible if:

- the site contains lithic debitage, finished stone tools, hammerstones, or antler flakers (**Material** and **Design**), and
- the site contains datable material (**Association**).

### Not Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period would not be eligible if:

- the site contains natural deposits of lithic materials that are impossible to distinguish from culturally modified lithic material (**Design**) or
- the site does not contain any temporal diagnostic evidence that could link the site to the Late Archaic period (**Association**).

**Copies of the following letter were sent to the following individuals:**

<b>Date</b>	<b>Subject</b>	<b>From</b>	<b>To</b>	<b>Corresp. Ref. No.</b>
8/12/2010	SR 520 Bridge Replacement and HOV Project, Seattle, King County, Consulting Party Participation and Revised Area of Potential Effects	Julie Meredith SR 520 Program Director WSDOT	Keith Stahley Historic Preservation City of Olympia P.O. Box 1967 Olympia, WA 98507-1967  Ed Galligan Port of Olympia 915 Washington St NE Olympia, WA 98501	LTR #1575    LTR #1574

