SR 520 Bridge Replacement and HOV Program, SR 520 I-5 to Montlake – I/C and Bridge Replacement, Draft Section 4(f) Evaluation

Prepared for
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I concur with the conclusions of this evaluation

Region / Mode Official

FHWA Official

Date

Date
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</thead>
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<tr>
<td>APE</td>
<td>Area of Potential Effects</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>CPTED</td>
<td>Crime Prevention Through Environmental Design</td>
</tr>
<tr>
<td>DAHP</td>
<td>Washington State Department of Historic Preservation</td>
</tr>
<tr>
<td>EIS</td>
<td>Environmental impact statement</td>
</tr>
<tr>
<td>FHWA</td>
<td>U.S. DOT Federal Highway Administration</td>
</tr>
<tr>
<td>Final EIS</td>
<td>2011 SR 520 Bridge Replacement and HOV Project Final EIS and Section 4(f) and 6(f) Evaluation</td>
</tr>
<tr>
<td>HOV</td>
<td>High-occupancy vehicle</td>
</tr>
<tr>
<td>I-5</td>
<td>Interstate 5</td>
</tr>
<tr>
<td>NOAA</td>
<td>National Oceanic and Atmospheric Administration</td>
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<tr>
<td>NPS</td>
<td>National Park Service</td>
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<tr>
<td>NRHP, or NR</td>
<td>National Register of Historic Places</td>
</tr>
<tr>
<td>Parks</td>
<td>City of Seattle Department of Parks and Recreation</td>
</tr>
<tr>
<td>ROD</td>
<td>Record of Decision</td>
</tr>
<tr>
<td>RSUP</td>
<td>Regional Shared-Use Path</td>
</tr>
<tr>
<td>SCDP</td>
<td>Seattle Community Design Process</td>
</tr>
<tr>
<td>Section 106</td>
<td>Section 106 of the National Historic Preservation Act</td>
</tr>
<tr>
<td>Section 4(f)</td>
<td>Section 4(f) of the Department of Transportation Act of 1966, as now codified at 23 U.S.C. § 138 and 49 U.S.C. § 303</td>
</tr>
<tr>
<td>SHPO</td>
<td>State Historic Preservation Officer (DAHP Director in Washington)</td>
</tr>
<tr>
<td>U.S. DOT</td>
<td>United States Department of Transportation</td>
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<td>WSDOT</td>
<td>Washington State Department of Transportation</td>
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Background

The SR 520 Bridge Replacement and HOV Program is rebuilding one of the Puget Sound region's busiest highway corridors to improve traffic safety, enhance regional mobility, and provide the public new and better options for active transportation (nonmotorized) travel. The program is being delivered through a series of individual construction phases. In 2011, the Federal Highway Administration (FHWA) and the Washington State Department of Transportation (WSDOT) completed a Final Environmental Impact Statement (EIS) and Section 4(f) Evaluation and a Record of Decision (ROD) for the SR 520 Bridge Replacement and HOV Program, I-5 to Medina: Bridge Replacement and HOV Project (WSDOT 2011a, FHWA 2011). This draft Section 4(f) Evaluation refers to the 2011 Final EIS and Section 4(f) and 6(f) Evaluation as the Final EIS.

The effects of the I-5 to Medina: SR 520 Bridge Replacement and HOV Project on Section 4(f)-protected resources were documented in Chapter 9 of the Final EIS, and the ROD includes FHWA’s determination that:

- There is no feasible and prudent alternative that completely avoids all Section 4(f) properties;
- The Selected Alternative causes the least harm to Section 4(f) properties and causes the least overall harm; and
- The Selected Alternative includes all possible planning to minimize harm.

In July 2012, FHWA issued a revised Section 4(f) Policy Paper that replaced the 2005 version under which the Section 4(f) analysis in the Final EIS (WSDOT 2011) was completed (FHWA 2012). The guidance covered 2008 revisions to the Section 4(f) regulations to address *de minimis* impact analysis, and to expand the guidance on least overall harm, among other topics. The Final EIS was completed in accordance with the 2008 revision of the regulations, but without the benefit of the expanded 2012 guidance. The information contained in Chapter 5.91 of the Final EIS is still applicable for evaluation of the SR 520 I-5 to Montlake – I/C and Bridge Replacement (Portage Bay Bridge and Roanoke Lid phase), and any analysis included in this revised Section 4(f) evaluation that relies on the expanded guidance specifically cites the 2012 guidance.

This revised evaluation compares the Section 4(f)-protected resources that would be affected by the Portage Bay Bridge and Roanoke Lid construction phase, to the findings of the Final EIS. Where there would be no change in the effect on the resource, the findings of the Final EIS are unchanged and FHWA’s prior determinations remain in place. Updated Section 106 documentation (National Park Service [NPS] 2015, WSDOT 2019a, 2019b, 2020a, 2020b) was also reviewed to identify any changes to historic properties. If either the status of the Section 4(f) protection of the resource or the design of the Portage Bay Bridge and Roanoke Lid phase changed relative to the resource since the Final EIS, then the effects of the Portage Bay Bridge and Roanoke Lid phase relative to what had been evaluated in the Final EIS were evaluated consistent with 23 Code of Federal Regulations (CFR) 774 and the guidelines contained in Section 457 of the WSDOT Environmental Manual and FHWA Section 4(f) Policy Paper (FHWA 2012).

One area where the 2012 USDOT Section 4(f) Policy Paper provides additional guidance is on *de minimis* impact finding for parks. The additional guidance follows:

*An impact to a public park, recreation area, or wildlife and waterfowl refuge may be determined to be de minimis if the transportation use of the Section 4(f) property, including*
incorporation of any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures), does not adversely affect the activities, features, or attributes that qualify the resource for protection under Section 4(f). Language included in the SAFETEA-LU Conference Report provides additional insight on the meaning of de minimis impact:

The purpose of the language is to clarify that the portions of the resource important to protect, such as playground equipment at a public park, should be distinguished from areas such as parking facilities. While a minor but adverse effect on the use of playground equipment should not be considered a de minimis impact under Section 4(f), encroachment on the parking lot may be deemed de minimis, as long as the public’s ability to access and use the site is not reduced. (Conference Report of the Committee of Conference on H.R. 3, Report 109-203, page 1057).

This simple example helps to distinguish the activities, features, or attributes of a Section 4(f) property that are important to protect from those which can be used without resulting in adverse effects. Playground equipment in a public park may be central to the recreational value of the park that Section 4(f) is designed to protect. The conference report makes it clear that when impacts are proposed to playground equipment or other essential features, a de minimis impact finding will at a minimum require a commitment to replace the equipment with similar or better equipment at a time and in a location that results in no adverse effect to the recreational activity. A parking lot encroachment or other similar type of land use, on the other hand, could result in a de minimis impact with minimal mitigation, as long as there are no adverse effects on public access and the official(s) with jurisdiction agree.

The impacts of a transportation project on a park, recreation area, or wildlife and waterfowl refuge that qualifies for Section 4(f) protection may be determined to be de minimis if:

1) The transportation use of the Section 4(f) property, together with any impact avoidance, minimization, and mitigation or enhancement measures incorporated into the project, does not adversely affect the activities, features, or attributes that qualify the resource for protection under Section 4(f);

2) The public has been afforded an opportunity to review and comment on the effects of the project on the protected activities, features, or attributes of the Section 4(f) property; and

3) The official(s) with jurisdiction over the property, after being informed of the public comments and FHWA’s intent to make the de minimis impact finding, concur in writing that the project will not adversely affect the activities, features, or attributes that qualify the property for protection under Section 4(f). (See 23 CFR 774.5(b)(2), 23 CFR 774.17).
Project Changes

Since completion of the Final EIS and ROD (FHWA 2011), WSDOT has advanced the I-5 to Medina: SR 520 Bridge Replacement and HOV Project, including completion of several phases of construction; coordination with the City of Seattle, local residents, and stakeholder; and acquisition of right-of-way from the National Oceanic and Atmospheric Administration (NOAA). During this time, the design of the Portage Bay Bridge, Roanoke Lid, and other components in the Portage Bay to I-5 Area have been refined through a community design process and coordination with the Seattle Design Commission in 2019. The following subsections describe the design changes since issue of the Final EIS.

Portage Bay Bridge

- The bridge configuration has changed from a single wide bridge with median to two parallel bridge structures.
- A new 14-foot-wide regional shared-use path (RSUP) will be integrated on the south side of the south bridge structure.
- The Final EIS did not define the bridge type. The bridge design was established through the Seattle Community Design Process (SCDP) as a haunched box girder design with variable width gap of approximately 6 to 19 feet added between the north and south structures; pre-stressed girders will be used in the final two easternmost bays.
- An 8-foot-wide planting median has been removed from the bridge structure to accommodate the added gap between the north and south bridge structures.
- The bridge alignment has been shifted to the north at the west end by approximately 35 feet to accommodate constructability considerations, requiring additional right-of-way and resulting in temporary construction impacts to the Queen City Yacht Club.
- The bridge profile has been changed from varying between 0.5 and 5 percent grade to a constant 2.6 percent grade for constructability, improved stormwater drainage, and RSUP access and comfort.
- The accommodation of RSUP connection on the east shore of the bay has added additional in-water piers; however, the total number of in-water piers and columns has been reduced from 50 to 42. This reduces aquatic impacts and improves the views and aesthetic appearance of the bridge structure.
- Additional connections for the newly included 14-foot-wide RSUP on the south side at Delmar Drive East and near the Montlake Playfield have been added. The connection near Montlake Playfield will permanently occupy airspace of Montlake Playfield as well as contain a number of in-water and on land piers.
- An additional 600 feet of storage for the eastbound Montlake off-ramp has been added to reduce traffic spillover backup from the off-ramp to the eastbound mainline.
- Modular wetlands that treat to enhanced water quality standards will be used in lieu of constructed wetlands in the vicinity of the Montlake loop ramp to handle stormwater runoff from the Portage Bay Bridge to the same level of pollutant removal, but within a smaller area.
Portage Bay Bridge through I-5 Interchange

East Roanoke Street

- A T-intersection, the current configuration, will be maintained at 10th Avenue East and East Roanoke Street for traffic calming and bicycle/pedestrian safety.
- A new east-west crosswalk on the south side of 10th Avenue East and East Roanoke Street intersection and a new north-south crosswalk on the west side of the 10th Avenue East and East Roanoke Street intersection have been added to accommodate bicycle and pedestrian users.

Roanoke Lid (10th and Delmar Lid)

- The east lid portal may be stepped to decrease the amount of wall exposure to nearby homes.
- The existing southbound bus shelter/stop on the west side of 10th Avenue East at East Roanoke Street will be retained at approximately the same location rather than being moved to the south.
- The parking area for the enhanced Bagley Viewpoint has been relocated to three parallel parking spaces on the east side of Delmar Drive East rather than head-in parking.
- The subsurface easement area has been increased to accommodate retaining wall anchors in response to additional geotechnical information about potentially unstable slopes. WSDOT will purchase these easements from property owners, as they may constrain future development on the properties.
- A tunnel fire and life safety mechanical and support facility was not previously anticipated. It will be located northwest of the lid, adjacent to Fire Station 22.
- The conceptual configuration of the lid that was included in the Final EIS has been detailed through the SCDP and subsequent community consultation, including:
  - Placement of medium-to-large trees within lid areas where structural capacity allows for finish grading to achieve appropriate tree soil depths.
  - Tree placement and plantings will be designed to maintain visibility into open space areas for natural surveillance.
  - Provide a series of outlooks including at both sides of 10th Avenue south of the lid, at the end of Federal Avenue and at the eastern edge of the lid replacing the Bagley Viewpoint.

Refinements to RSUP and local active transportation connections

- A sidewalk will be added along the planned RSUP from the Montlake Boulevard RSUP tunnel south and west under the Portage Bay Bridge structures providing additional path width and separation for bicycle and pedestrian users.
- Several new RSUP connections associated with extending the RSUP across the Portage Bay Bridge, including
  - A direct RSUP connection near the east end of the Portage Bay Bridge connecting towards the Montlake Boulevard RSUP tunnel prioritizing regional users.
SR 520 Bridge Replacement and HOV Program, SR 520 I-5 to Montlake – I/C and Bridge Replacement, Draft Section 4(f) Evaluation

- The structural connection from the west end of the Portage Bay Bridge RSUP to Delmar Drive East will be landward of Portage Bay to ease constructability and minimize environmental impacts. The RSUP connection will loop to a trailhead near the intersection of Interlaken Boulevard and Delmar Drive East and connect to the city non-motorized network and reduce the size and visual impact of the retaining wall and structures near the lid portal.
- An improved local connection at Delmar Drive East, including a crosswalk across Delmar Drive East at East Interlaken Boulevard.
- A stair connection from the replaced Bagley Viewpoint outlook down to the RSUP connection to the bridge.
  - In partnership with the City of Seattle, newly proposed local street sidewalk improvements to provide an Americans with Disabilities Act (ADA) connection as an alternative to the stairs between East Roanoke Street and Boyer Avenue East.
  - A tabled intersection with rapid flashing beacons will be added at the intersection of 11th Avenue East and Delmar Drive East.
  - Generally consistent with the Final EIS conceptual design, the local path on the Roanoke Lid will be configured in an oval shape with side connections to the Federal Avenue East greenway, the intersection of Delmar Drive East and 11th Avenue East, the intersection of 10th Avenue East and East Roanoke Street, and westward to Harvard Avenue East.
  - An ADA connection will be added from the sidewalk on the west side of 10th Avenue East to the local path after it crosses under 10th Avenue East.
  - An ADA connection will be added from the sidewalk on the east side of 10th Avenue East down to the lid area path.
  - A set of stairs have been added to connect the RSUP to the east side of Delmar Drive to provide multiple options for egress to meet Crime Prevention Through Environmental Design (CPTED) guidelines.
  - A new connection from the Roanoke Lid through WSDOT right-of-way to the City of Seattle’s local multi-modal network trailhead at the intersection of Broadway Avenue East, Harvard Avenue East, and East Miller Street.

Summary of City of Seattle, Stakeholder, and Community Involvement

Seattle Community Design Process

Following Federal approval of the Final EIS Preferred Alternative in 2011, WSDOT launched the Seattle Community Design Process (SCDP), a robust and collaborative effort with the City of Seattle, design professionals, and the broader public to refine the corridor vision and conceptual design for the unfunded portions of the SR 520 project in Seattle. WSDOT convened the SCDP in 2011 to meet its commitment to work collaboratively with the City of Seattle and Seattle neighborhood stakeholders to refine the SR 520 corridor between I-5 and the West Approach Bridge. This commitment emerged from the 2010 multi-agency workgroup process (ESSB 6392) and the 2011 Seattle/SR 520 project Memorandum of Understanding.

The SCDP was an iterative process that:

- Informed the public about the SR 520 corridor in Seattle.
- Listened to community and stakeholder feedback regarding the project design.
- Explored design refinements and collected additional public feedback.
• Integrated best practices for urban and sustainable design into the project based on feedback received.
• Continued to collect input from agency partners and community stakeholders as the process moved forward.

The SCDP included seven public workshops, 25 community organization and stakeholder briefings, and generated thousands of public comments. In addition, approximately 350 people attended a September open house where more than 150 individual written comment cards were received. Through this effort, WSDOT and the City of Seattle:

• Identified many well-supported design preferences that were endorsed by the Seattle City Council.
• Identified areas requiring further design work before a Final Concept Design could be confirmed. The City of Seattle formalized its guidance in Resolution 31427 in 2013, and WSDOT incorporated endorsed design elements in the SR 520 Preliminary Concept Design. Areas requiring further design exploration to reach a recommendation – the Portage Bay Bridge, the Montlake lid area, and active transportation connectivity – were the focus of additional design work described in this report.

WSDOT heard several key themes from the public during the SCDP, which served as a foundation for additional subsequent design work. To incorporate the community and stakeholder input from the SCDP, the design team began their work by reviewing the SCDP “Public Comment Summary” to ensure that recommendations reflected community preferences heard to date.

While the SCDP was an iterative public process, the continuing design work has focused on decision-making related to remaining conceptual design issues. Therefore, public feedback has been received in existing forums at Seattle City Council and Seattle Design Commission briefings. WSDOT and the City of Seattle have also briefed community organizations throughout the process and hosted a series of open houses in the Montlake and north Capitol Hill communities to present refined design concepts and hear public feedback as each project phase has progressed.

Subsequent Community Involvement

Between June and November of 2019, WSDOT met with community members and stakeholders on a monthly basis to refine the Portage Bay Bridge and Roanoke Lid phase’s conceptual design. The focus of this stakeholder process was to gather feedback and hear community preferences on:

• The look and feel of the Roanoke Lid and how people would use the space.
• Nonmotorized connections throughout the project area.
• User experience in areas under the Portage Bay Bridge around Boyer Avenue East and the Bill Dawson Trail.

This outreach effort consisted of two project open houses, three community stakeholder workshops, which focused on specific design topics, and an online open house, which hosted meeting materials and summaries and ran throughout the outreach process. Meeting participants included neighborhood groups, City of Seattle departments, and representatives of organizations such as Cascade Bicycle Club, Friends of Seattle Olmsted Parks and many others.

During this process, WSDOT also met with the Seattle Design Commission, in five subcommittee workshops and three full briefings. At each meeting, WSDOT updated commissioners on the feedback received at the public meetings and workshops. Design updates resulting from the
workshops, in turn were shared with public meeting participants, creating a back-and-forth exchange between the community and the Seattle Design Commission.

WSDOT developed a public comment summary, which outlined the outreach process and provided responses to key public comment themes. The feedback included in the summary informed the refinement of the final conceptual design, which is reflected in this evaluation.
Section 4(f)-Protected Properties

Section 9.2 of the Final EIS identified two parklands (Bagley Viewpoint and Montlake Playfield), a recreational trail (the Bill Dawson Trail), two individual historic properties (Fire Station #22 and NOAA Northwest Fisheries Science Center), and one historic district (the Montlake Historic District) as Section 4(f)-protected properties that would be affected by the Portage Bay Bridge and Roanoke Lid phase of the SR 520 Bridge Replacement and HOV Project. In addition to these properties, two additional parklands (Interlaken Park and Roanoke Park) and one additional historic district (the Roanoke Park Historic District) are located in the area that would be affected by the project changes considered in this draft Section 4(f) evaluation (Table 1).

Table 1. Summary of Section 4(f) Properties

<table>
<thead>
<tr>
<th>Property</th>
<th>Type</th>
<th>Protected activities, features, or attributes</th>
<th>Change in Section 4(f) status since Final EIS</th>
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</thead>
<tbody>
<tr>
<td>Bagley Viewpoint</td>
<td>Public Park</td>
<td>Significant viewpoint</td>
<td>None</td>
</tr>
<tr>
<td>Montlake Playfield</td>
<td>Public Park</td>
<td>Community center, playfields, children’s play area, and tennis courts</td>
<td>None</td>
</tr>
<tr>
<td>Bill Dawson Trail</td>
<td>Recreational Trail</td>
<td>Biking, walking, and jogging</td>
<td>None</td>
</tr>
<tr>
<td>Interlaken Park</td>
<td>Public Park</td>
<td>Biking, hiking, and jogging</td>
<td>Property was not included in Final EIS Section 4(f) evaluation</td>
</tr>
<tr>
<td>Roanoke Park</td>
<td>Public Park</td>
<td>Picnicking, playground, and memorial site</td>
<td>Property was not included in Final EIS Section 4(f) evaluation</td>
</tr>
<tr>
<td>Fire Station #22</td>
<td>Historic Property</td>
<td>None, property no longer exists</td>
<td>Property no longer exists</td>
</tr>
<tr>
<td>NOAA Fisheries Science Center</td>
<td>Historic Property</td>
<td>Eligible under Criterion A for direct association with important scientific research. Eligible under Criterion C. The 1931 building is significant for its distinctive architectural design that incorporates marine motifs to visually demonstrate its association with marine research.</td>
<td>None</td>
</tr>
<tr>
<td>Montlake Historic District</td>
<td>Historic District</td>
<td>Represents a significant, cohesive collection of residential architecture typical of early 20th century Seattle.</td>
<td>None</td>
</tr>
<tr>
<td>Roanoke Park Historic District</td>
<td>Historic District</td>
<td>Eligible under Criterion A for direct association with events that made a significant contribute to the broad patterns of history and Criterion C for its collection of early 20th century residential architecture.</td>
<td>Property was not included in Final EIS Section 4(f) evaluation</td>
</tr>
</tbody>
</table>
Park and Recreational Resources

Bagley Viewpoint, the Montlake Playfield, and the Bill Dawson Trail continue to exist in the area affected by the Portage Bay Bridge and Roanoke Lid phase as documented in the Final EIS. The description of these resources included in the Final EIS continues to be applicable.

Interlaken Park

Interlaken Park (Figure 1) is a 51.7-acre public park described by the City of Seattle Department of Parks and Recreation (Parks) as follows:

Interlaken Park is a densely wooded area on the north end of Capitol Hill. The paths and trails throughout the park are frequented by bikers, hikers and joggers.

In the 1890's, Interlaken Boulevard was the principal bike and buggy path linking Capitol Hill with the boulevards on Lake Washington. The conversion around that time of the high bicycle wheel to the low bicycle wheel made bicycles much easier to ride and very popular. Assistant City Engineer George F. Cotterill, conscious of the hazards of biking on city streets lined with planks, toured the city to look for good bikeways. His bike trails formed the basis of the city's boulevard system, and in 1903, the Olmsted Brothers approved Interlaken as a boulevard route. It soon became popular with walkers and auto drivers, who appreciated the views of mountains and lakes. In 1913, five acres of the Interlaken area were set aside as Boren Park to honor Louisa Boren Denny, the last surviving member of the party of pioneers that landed at Alki in 1851 (Seattle 2020).

Per the city’s description, biking, hiking, and jogging are identified as important activities in the park and constitute activities, features, or attributes that qualify the property for protection under Section 4(f). This is supported by the identified Greenway Project for Interlaken Park in the Parks and Open Space Plan for “Park District implementation of enhancements for non-motorized access to parks and open spaces in collaboration with SDOT” (Seattle 2017).

Roanoke Park

Roanoke Park (Figure 1) is a 2.2-acre public park described by the City of Seattle Department of Parks and Recreation as follows:

Roanoke Park is a grassy, pleasant space located on north Capitol Hill where 10th Avenue E ends at E Roanoke. Located in a residential area, it has fruit trees that burst into color in the spring; it's an ideal place to enjoy a picnic while your kids frolic in the play area. (Seattle 2020).

Per the city’s description, picnicking and a playground are identified as important activities and features in the park and constitute activities, features, or attributes that qualify the property for protection under Section 4(f). In 1929 the park was designated by the Park Board as the designated location for memorials within the City of Seattle per a resolution that read “Roanoke Park, and the public squares at street intersections, be set aside as memorial sites and that memorials shall not be erected in other parks in the City of Seattle”; however, no memorials were erected in the park until 2003, when a plaque honoring the Heritage Elm was erected (NPS 2009). As such, the only memorial site in the park that constitutes a feature or attribute that qualifies the property for protection under Section 4(f) is the Heritage Elm and its associated plaque.
Figure 1. Public Parks in the Portage Bay Bridge and Roanoke Lid Vicinity

Source: Seattle Parks and Recreation, 2020
Historic Properties

Since the Final EIS and ROD, WSDOT has conducted coordination and completed additional surveys to identify and document historic properties per Section 106 of the National Historic Preservation Act. The ROD included a Section 106 finding of Adverse Effect for the I-5 to Medina: SR 520 Bridge Replacement and HOV Project. FHWA and WSDOT have continued Section 106 consultation with the State Historic Preservation Officer (SHPO) and amended the Programmatic Agreement between SHPO, FHWA, NOAA, the US Army Corps of Engineers, and the Advisory Council on Historic Preservation in 2015 and 2019. The Department of Archaeology and Historic Preservation (DAHP) director is the SHPO for the State of Washington.

In 2019 and 2020, WSDOT expanded the Section 106 Area of Potential Effects (APE) and limits of construction in the vicinity of the Portage Bay Bridge and Roanoke Lid phase to reflect design changes, including pedestrian and bicycle enhancements, subsurface utility connections, and additional subsurface structural anchoring indicated by further investigation of poor soils and unstable slope conditions in the project area (WSDOT 2019a and 2020a). Per Programmatic Agreement Stipulation VII.A.2, WSDOT consulted with the SHPO and the project’s Section 106 consulting parties about these changes, and the SHPO concurred on March 11, 2019 and June 12, 2020 (Appendix A).

The NOAA Northwest Fisheries Science Center and the Montlake Historic District continue to exist in the area affected by the Portage Bay Bridge and Roanoke Lid phase as documented in the Final EIS.

Fire Station #22

Subsequent to completion of the Final EIS and ROD, the City of Seattle replaced Fire Station #22 with a modern building. The current fire station, which was constructed on the site previously occupied by the historic property, was opened in 2018 and completely replaced the 1964 building. Fire Station #22 is no longer a historic property and is no longer protected under Section 4(f).

Roanoke Park Historic District

The Roanoke Park Historic District is located north of SR 520, bounded by East Shelby Street, East Roanoke Street, Harvard Avenue East, and 10th Avenue East (Figure 2). At the time of the Final EIS and ROD, the historic district was within the APE for the project, but outside of the anticipated limits of construction. The district includes Roanoke Park, 78 contributing buildings, and 55 other contributing structures, with a period of significance from 1899 to 1939. Aside from one church, all contributing buildings are residential. The district is listed on the National Register of Historic Places under Criteria A and C.
Figure 2. Roanoke Park Historic District

Roanoke Park Historic District
Contributing Vs. Non - Contributing Map - Primary Structures

Contribution
Non-Contribution

SOURCE: NPS 2009
Evaluation of Use

Table 2 summarizes the current Section 4(f) evaluation relative to the Final EIS Section 4(f) findings.

Table 2. Summary of Section 4(f) Revised Evaluation

<table>
<thead>
<tr>
<th>Property</th>
<th>Final EIS Section 4(f) Finding</th>
<th>Portage Bay Bridge and Roanoke Lid Draft Section 4(f) Preliminary Finding</th>
<th>Change compared to Final EIS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bagley Viewpoint</td>
<td>Use</td>
<td>Use</td>
<td>No change</td>
</tr>
<tr>
<td>Montlake Playfield</td>
<td>Use</td>
<td>Use</td>
<td>Additional bicycle and pedestrian connections, changed alignment, resulting in use of additional area</td>
</tr>
<tr>
<td>Bill Dawson Trail</td>
<td>Trail continuity exception [23 CFR 774.13(f)(3)]</td>
<td>Trail continuity exception [23 CFR 774.13(f)(3)]</td>
<td>Design implements measures to minimize harm that were identified in the Final EIS</td>
</tr>
<tr>
<td>Interlaken Park</td>
<td>None</td>
<td>de minimis impact</td>
<td>Newly evaluated as a park</td>
</tr>
<tr>
<td>Roanoke Park</td>
<td>None</td>
<td>Temporary occupancy exception [23 CFR 774.13(d)]</td>
<td>Temporary construction within the park and placement of retaining wall anchors below the park.</td>
</tr>
<tr>
<td>Fire Station #22</td>
<td>Use</td>
<td>None</td>
<td>Property no longer exists</td>
</tr>
<tr>
<td>NOAA Fisheries Science Center</td>
<td>Use</td>
<td>Use</td>
<td>No change</td>
</tr>
<tr>
<td>Montlake Historic District</td>
<td>Use</td>
<td>Use</td>
<td>Additional bicycle and pedestrian connections within Montlake Playfield, no other changes within district.</td>
</tr>
<tr>
<td>Roanoke Park Historic District</td>
<td>None</td>
<td>de minimis impact</td>
<td>Temporary construction within the district boundary and placement of retaining wall anchors below the district.</td>
</tr>
</tbody>
</table>

Bagley Viewpoint

Relative to the analysis included in the Final EIS, there would be no change in the project use or commitment of measures to avoid, minimize, and mitigate harm to the district. The findings included in the Final EIS continue to apply.

Montlake Playfield

The Final EIS evaluated a shift in alignment of SR 520 to the south, toward the Montlake Playfield and away from the NOAA Northwest Fisheries Science Center on the north side of the corridor. This shift entailed a permanent incorporation of Montlake Playfield property, some of which is submerged land. The Final EIS identified a total of 1.2 acres of land for acquisition, 1.0 acre of which would be
submerged land on the north side of SR 520. The remaining 0.2 acre of acquisition was a sliver of land adjacent to SR 520 right-of-way in the northeast corner of the property. An area of 3.2 acres was identified for construction easements for the duration of the project, 2.9 acres of which would be submerged land. Figure 3 shows the effects of project design changes overlaid on Exhibit 9-7 from the Final EIS to illustrate the change in effects to Montlake Playfield. As shown in Table 3, the area of permanent acquisition of upland area from the park would be less than identified for the Final EIS Preferred Alternative; however, acquisition of submerged lands for highway right-of-way would increase, as would both the upland and submerged areas needed during construction.

Table 3. Summary of Section 4(f) Land Used from Montlake Playfield

<table>
<thead>
<tr>
<th>Activity</th>
<th>Final EIS Section 4(f) Use (acres)</th>
<th>Portage Bay Bridge and Roanoke Lid Section 4(f) Use (acres)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permanent acquisition of upland area</td>
<td>0.2</td>
<td>0.1</td>
</tr>
<tr>
<td>Permanent acquisition of submerged lands</td>
<td>1.0</td>
<td>1.8</td>
</tr>
<tr>
<td>Area for new RSUP connection, remaining in park ownership</td>
<td>0</td>
<td>0.1</td>
</tr>
<tr>
<td>Temporary construction easement of upland area</td>
<td>0.3</td>
<td>0.6</td>
</tr>
<tr>
<td>Temporary construction easement of submerged lands</td>
<td>2.9</td>
<td>3.5</td>
</tr>
</tbody>
</table>

The Final EIS discussed the activities, features, and attributes of Montlake Playfield, including the following discussion of the submerged lands.

_The submerged land that would be acquired is on the north side of the existing SR 520 and was never used as a part of the playfield. While it is technically within the boundaries of the park, it has always been submerged and was never developed as a park. The Montlake Playfield does not have a dedicated aquatic element as part of the park function. People do use the water in the northern part of the park, but it has no facilities dedicated to water craft and water activities (WSDOT 2011a)._ 

While additional aquatic land would be permanently incorporated into the project, the activities that occur there are not identified activities, features, or attributes that qualify Montlake Playfield for protection under Section 4(f). As was the case with the Final EIS design, once construction is complete, water users will be able to access the under-bridge areas that are currently Montlake Playfield submerged lands.

The temporary construction easement for upland areas will increase to allow construction of the RSUP connections to Montlake Playfield and the Bill Dawson Trail. The Final EIS commitment to provide a detour plan for the Bill Dawson Trail and its connection to Montlake Playfield will continue to be applicable and a bicycle and pedestrian detour will be provided around the construction area while the RSUP connections and the Bill Dawson Trail improvements are being constructed.
Figure 3. Project Changes Relative to Montlake Playfield

SOURCE: WSDOT 2011a, 2020
The temporary construction easement area for the submerged lands will be larger to accommodate the north shift in the bridge alignment, the widening of the bridge to include the RSUP, and to provide sufficient access and staging area for bridge construction. While water activities are not the activities, features, or attributes that qualify Montlake Playfield for protection under Section 4(f), recreational water access for hand-carried craft is available from Montlake Playfield. During construction, WSDOT will provide water access at one or more locations with at least 10 feet of vertical clearance to cross under the Portage Bay Bridge and temporary construction trestles. This will allow for small boat access to and from Montlake Playfield.

The Final EIS identified Section 4(f) use of Montlake Playfield. The revised design would continue to use land from Montlake Playfield.

The Montlake Playfield is also a contributing element to the Montlake Historic District, which is evaluated separately as a historic property below.

**Bill Dawson Trail**

The Final EIS identified relocation of the Bill Dawson Trail within WSDOT right-of-way and within the Montlake Playfield on City of Seattle parkland. The Final EIS documented that in accordance with 23 CFR 774.13(f)(3), trails, paths, bikeways, and sidewalks that occupy a transportation facility right-of-way without limitation to any specific location within that right-of-way are excepted from Section 4(f), so long as the continuity of the trail, path, bikeway, or sidewalk is maintained. The affected portion of the Bill Dawson Trail is located within WSDOT right-of-way but is not mandated to any specific place within the right-of-way, and the continuity of the trail would be maintained during and after construction. Therefore, the Bill Dawson Trail is excepted from Section 4(f).

The design changes included in this draft Section 4(f) Evaluation implement the identified requirement to maintain continuity and provides for additional access and connection to the trail from the newly proposed RSUP. The design changes continue to meet the requirements of 23 CFR 774.13(f)(3) to except the trail from Section 4(f).

**Interlaken Park**

The connection to the western end RSUP in the Delmar Drive area would require improvements to the existing sidewalk and bike lane on Delmar Drive East and crosswalk at Delmar Drive East and East Interlaken Boulevard to provide a local connection to the RSUP while meeting accessibility guidelines (Figure 4). A portion of this connection would be outside of the city street right-of-way for Delmar Drive. The bicycle and pedestrian improvements would affect approximately 8,200 square feet (0.2 acre) from the 51.7 acre Interlaken Park and would provide a direct accessible connection from the RSUP, where it ends at Delmar Drive East, to the park entry point at East Interlaken Boulevard and Delmar Drive East. East Interlaken Boulevard, a City of Seattle street, lies on park land and does not have an identified roadway right-of-way. The roadway area shown in Figure 4 on park land is the existing city roadway, which would not be altered, except to tie-in the bicycle and pedestrian improvements. There would be no conversion of land ownership of park land.
Figure 4. Project Changes Relative to Interlaken and Roanoke Parks

SOURCE: WSDOT 2011A, 2020
The proposed improvements within Interlaken Park consist only of bicycle and pedestrian connection and safety improvements to provide improved access to the park for active transportation (nonmotorized) users. The improvements are consistent with the Section 4(f) Policy Paper guidance on de minimis impacts to parks in that the improvements will provide enhanced bicycle and pedestrian access to the park, for which biking, hiking, and jogging are identified as important activities in the park that constitute the activities, features, or attributes that qualify the property for protection under Section 4(f). It is also consistent with the Parks and Open Space Plan for “Park District implementation of enhancements for non-motorized access to parks and open spaces...”. The project improvements within the park boundary would constitute an enhancement and would not adversely affect the activities, features, or attributes that qualify the resource for protection under Section 4(f).

Based on this analysis, FHWA has made a preliminary de minimis impact finding for the effects of the I-5 to Medina: SR 520 Bridge Replacement and HOV Project on Interlaken Park. For FHWA to make a de minimis impact finding, the public must be afforded an opportunity to review and comment on the effects and the official with jurisdiction must concur in writing that the project will not adversely affect the activities, features, or attributes that qualify the property for protection under Section 4(f). As documented in the Coordination section of this evaluation, WSDOT has coordinated with Parks, and the department is in agreement that the sidewalk, bike lane, and crosswalk improvements would not adversely affect the park. WSDOT is preparing for a public open house related to project changes associated with the Portage Bay Bridge and Roanoke Lid phase and will share this draft Section 4(f) evaluation for the public to review and comment. WSDOT will then share any public comments related to this evaluation with Parks and request written concurrence that any impacts to Interlaken Park would be de minimis.

Should Parks concur with the determination, FHWA would then make a final de minimis impact finding for the effects on the I-5 to Medina: SR 520 Bridge Replacement and HOV Project on Interlaken Park. Because the impact to Interlaken Park would be de minimis, the alternative can be approved without the need to develop and evaluate alternatives that would avoid using the Section 4(f) property (FHWA 2012) and the requirements for all possible planning to minimize harm is subsumed [23 CFR 774.17(5)].

**Roanoke Park**

Roanoke Park (Figure 4) may be affected in two ways that were not previously evaluated. First, relocating a Seattle Public Utilities water line that currently crosses under the park and SR 520. Second, subsurface retaining wall anchors will extend below the surface of the park.

The portion of the water line that is under SR 520 will have to be relocated to accommodate the Roanoke lid. The connection point to the existing water line may have to be made within the boundary of Roanoke Park, where there is an existing underground waterline bend. The connection would require an approximately 20 foot by 20 foot area (<0.1 acre) for excavation and connection within the park boundary (Figure 4). An isolation valve would be installed within a concrete vault with an access hatch extending to the ground surface. Construction and restoration would occur during completion of the Portage Bay Bridge and Roanoke Lid phase and would be of a shorter duration than the construction phase. The park would be fully restored and accessible afterward.

Under U.S. DOT regulations (23 CFR Section 774.13), a temporary occupancy of a property does not constitute a use of a Section 4(f) resource when all the following conditions are satisfied:
• Duration is temporary (i.e., less than the time needed for construction of the project), and there should be no change in ownership of the land;

• Scope of work is minor (i.e., both the nature and magnitude of the changes to the Section 4(f) property are minimal);

• There are no anticipated permanent adverse physical impacts, nor is there interference with the protected activities, features, or attributes of the property, on either a temporary or permanent basis;

• The land being used will be fully restored (i.e., the property must be returned to a condition that is at least as good as that which existed prior to the project); and

• There must be documented agreement of the official(s) having jurisdiction over the Section 4(f) resource regarding the above conditions.

The waterline relocation would meet the requirements of a temporary occupancy exception. There would be no change to land ownership, the entire property currently owned by the City of Seattle Department of Parks and Recreation would remain in Parks’ ownership and the time of disturbance would be less than for the phase of construction as a whole. The scope of work is minor, in that it is limited to connecting a new water line running under SR 520 to an existing line in the park. There are no anticipated permanent adverse impacts, as the area would be fully restored and there would not be interference with protected activities, features, or attributes, as the work would be limited to a small area of the park. Playground and picnicking areas would not be disturbed. The land would be fully restored. Finally, WSDOT has coordinated with the City of Seattle regarding the need to connect the relocated waterline within the park property. Prior to issue of the Final Section 4(f) Evaluation, as part of continued coordination Parks, WSDOT will request written concurrence that Parks agrees that the conditions of the temporary occupancy exception are met. FHWA is making a preliminary determination of temporary occupancy exception on Roanoke Park, pending such written concurrence.

The expanded limits of construction that extend under Roanoke Park (Figure 4) are limited to the above-mentioned relocated waterline and increased subsurface easement area to accommodate retaining wall anchors in response to additional geotechnical information about potentially unstable slopes. There would be no permanent surface disturbance within the boundaries of the park. Per Question 28A of the Section 4(f) Policy Paper (FHWA 2012):

Section 4(f) applies to tunneling only if the tunneling:

• Disturbs archaeological sites that are on or eligible for the National Register (NR) which warrant preservation in place;

• Causes disruption which would permanently harm the purposes for which the park, recreation, wildlife or waterfowl refuge was established;

• Substantially impairs the historic values of a historic site; or

• Otherwise does not meet the exception for temporary occupancy.

Only the second and forth bullet, related to parks and temporary occupancy, are relevant to the analysis of Roanoke Park. The project would not permanently affect use of the park; it would not affect the playground or Heritage Elm or impair use of the park for picnicking. Also, as discussed
above, the work within the park to connect the relocated subsurface waterline would meet the requirements for the exception for temporary occupancy. Therefore, Section 4(f) would not apply to the subsurface easements to accommodate retaining wall anchors or the relocated waterline.

Roanoke Park is also a contributing element to the Roanoke Park Historic District, which is evaluated separately as a historic property below.

**NOAA Fisheries Science Center**

The Final EIS and ROD identified acquisition of 0.5 acre from the NOAA Fisheries Science Center. NOAA transferred approximately 0.5 acre of property to WSDOT by deed dated February 22, 2019. There will be no additional use of the property. The findings included in the Final EIS continue to apply.

**Montlake Historic District**

The Final EIS and ROD identified acquisition of land from the Montlake Historic District. The identified acquisition included two contributing residences, the property from the NOAA Fisheries Science Center described above, Canal Reserve Land, part of the Montlake Boulevard median, part of East Montlake Park, and part of the Montlake Playfield, which is discussed above as a recreational property. Of these properties, the only change related to the Portage Bay Bridge and Roanoke Lid phase of the I-5 to Medina: SR 520 Bridge Replacement and HOV Project would be to Montlake Playfield (Figure 5). Montlake Playfield is not individually eligible for the NRHP. FHWA and WSDOT reviewed the effects of the design changes on the Montlake Historic District as a whole and determined that the changes would not adversely affect the setting, feeling, and association of the district relative to the analysis included in the Final EIS (WSDOT 2020b).

Per Question 2B of the Section 4(f) Policy Paper (FHWA 2012), “Within a NR listed or eligible historic district, FHWA’s long-standing policy is that Section 4(f) applies to those properties that are considered contributing to the eligibility of the historic district.” Question 7C of the Section 4(f) Policy Paper (FHWA 2012) provides the following guidance on evaluating Section 4(f) use in historic districts:

> When a project requires land from a non-historic or non-contributing property lying within a historic district and does not use other land within the historic district that is considered contributing to its historic significance, FHWA’s longstanding policy is that there is no direct use of the historic district for purposes of Section 4(f)... When a project uses land from an individually eligible property within a historic district, or a property that is a contributing element to the historic district, Section 4(f) is applicable.

The Montlake Historic District was listed on the National Register of Historic Places on June 19, 2015. The nomination form details the contributing resources within the overall historic property of the district. The nomination form includes the following description of the Montlake Community Center and Playfield:
Figure 5. Project Changes Relative to Montlake Historic District

SOURCE: NPS 2015, WSDOT 2020b
The original Montlake Community Center is a Tudor Revival-style building constructed along with the Montlake Playfield partially on fill in former marshlands on the shores of Portage Bay between 1933 and 1936. The area had been used by Dahlia Land, a local garden store, to grow dahlia bulbs for commercial use. The building and playfield were built by WPA (Works Progress/Works Projects Administration) workers. The playfield was expanded in the early 1960s when material dredged for construction of the Evergreen Point Floating Bridge was dumped along its edge. The facilities were improved and enhanced in the mid-1970s, including reconfiguration to accommodate football and track, and the construction of a separate gymnasium/community center facility. The gymnasium is non-contributing (NPS 2015).

Further description is provided specific to the Montlake Playfield:

The Montlake Playfield (historic contributing site) (largely described above, as part of the Montlake Community Club/Montlake Playfield overview) was established in 1932 at the request of the Montlake Community Club, which sought a recreational area for neighborhood children. Construction did not begin until 1934, when the state stepped in to assist the city with various public works projects, including the Montlake Playfield. The project was completed in 1935 under another agency, the Works Progress Administration. The Tudor Revival-style field house was dedicated on October 23, 1935 (NPS 2015).

While the design changes would introduce additional bicycle and pedestrian connections within the historic district, the change would be minor and at the edge of the historic district in an area of the Montlake Playfield that was reconfigured after the period of significance for the Montlake Historic District (1904-1959). Because the area containing the bicycle and pedestrian trail connections would stay within Parks ownership, it would not be a conversion of land to transportation use and would not increase the area of the Montlake Historic District that would be permanently incorporated into the project. The temporary occupancy of the Montlake Playfield contributing property during construction would increase from the 0.3 acre identified in the Final EIS to 0.6 acre to allow for the trail connections, would be temporary, and would not constitute an adverse effect to the integrity of the activities, features, and attributes that qualify the Montlake Historic District for protection under Section 4(f). The FHWA determined that the project changes would not cause a new adverse effect or increase the severity of the effect already determined to occur on the district. The determination was sent to the Washington SHPO for concurrence on August 5, 2020.

Roanoke Park Historic District

The expanded limits of construction within the Roanoke Park Historic District (Figure 6) are limited to de minimis impact during water line relocation and a permanent increased subsurface easement area to accommodate the utility and retaining wall anchors in response to additional geotechnical information about potentially unstable slopes. Aside from the utility vault access lid described below, there would be no permanent surface disturbance within the boundaries of the historic district. The evaluation of the Roanoke Park Historic District is similar to that for Roanoke Park because the project effects within the historic district are the same as within the park as evaluated as a recreational property. Roanoke Park is a contributing property to the Roanoke Park Historic District, but is not individually eligible for the NRHP. FHWA and WSDOT reviewed the effects of the design changes on the Roanoke Park Historic District as a whole and determined that the changes would not adversely affect the setting, feeling, and association of the district relative to the analysis included in
the Final EIS and that there would be No Adverse Effect on the district (WSDOT 2020b). The determination was sent to the Washington SHPO for concurrence on August 5, 2020.

The portion of the water line that is under SR 520 will have to be relocated to accommodate the Roanoke lid. The connection point to the existing water line may have to be made within the boundary the Roanoke Park Historic District, on the Roanoke Park contributing property, where there is an existing underground waterline bend. The connection would require excavation and connection within the district boundary. An isolation valve would be installed within a concrete vault with an access hatch extending to the ground surface. The property would be fully restored.

There would be no change to land ownership of any property within the Roanoke Park Historic District. The scope or work is minor, in that it is limited to connecting a new water line running under SR 520 to an existing line in the district. As described in the Section 106 review, the effect on setting, feeling, and association would be minor and not adverse, given the small area of change relative to the district as a whole (WSDOT 2020b). There are no anticipated permanent adverse impacts, as the area would be fully restored and there would not be interference with protected activities, features, or attributes of the district, as reflected in the No Adverse Effect determination on the district. The land would be fully restored. Per 23 CFR 774.17, a *de minimis* impact to a historic property means that the FHWA has determined, in accordance with 36 CFR Part 800, that no historic property is affected by the project or the project would have “no adverse effect” on the property in question.

The expanded limits of construction that extend under the Roanoke Park Historic District (Figure 6) are limited to the above-mentioned relocated waterline and increased subsurface easement area to accommodate retaining wall anchors in response to additional geotechnical information about potentially unstable slopes. Aside from the utility vault lid that would be flush to the ground, there would be no permanent surface disturbance within the boundaries of the historic district.

Per Question 28A of the Section 4(f) Policy Paper (FHWA 2012):

Section 4(f) applies to tunneling only if the tunneling:

- Disturbs archaeological sites that are on or eligible for the National Register (NR) which warrant preservation in place;
- Causes disruption which would permanently harm the purposes for which the park, recreation, wildlife or waterfowl refuge was established;
- Substantially impairs the historic values of a historic site; or
- Otherwise does not meet the exception for temporary occupancy.

Only the third bullet, related to historic sites, is relevant to the analysis of the retaining wall anchors within the Roanoke Park Historic District. Because the project would not adversely affect the district, it would not substantially impair the historic value of the district; therefore, Section 4(f) would not apply to the subsurface easements to accommodate retaining wall anchors.

Based on this analysis and the No Adverse Effect determination on the district under Section 106, FHWA has made a preliminary *de minimis* impact finding for the effects of the I-5 to Medina: SR 520 Bridge Replacement and HOV Project on the Roanoke Park Historic District pending concurrence from the Washington SHPO that the project would have No Adverse Effect on the district. On August 5, 2020, FHWA and WSDOT notified the Washington SHPO of their intent to make a *de minimis* impact finding based on the SHPO’s concurrence under Section 106.
Figure 6. Project Changes Relative to Roanoke Park Historic District

Source: NPS 2009, WSDOT 2020b
Avoidance Alternatives

The 2011 Final EIS and Section 4(f) and 6(f) Evaluation investigated a range of avoidance alternatives and determined that there was not a feasible and prudent avoidance alternative to the use of Section 4(f) properties. The Final EIS evaluation for Section 4(f) remains valid for the project overall. The proposed refinements to the Portage Bay Bridge and Roanoke Lid phase would increase the area of non-de minimis use of two properties (Montlake Playfield and the Montlake Historic District) that were evaluated in the Final EIS. For properties with a de minimis impact, the alternative can be approved without the need to develop and evaluate alternatives that would avoid using the Section 4(f) property (FHWA 2012).

A “feasible and prudent” avoidance alternative is defined in 23 CFR 774 as an alternative that avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting Section 4(f) properties. An alternative is not feasible if it cannot be built as a matter of sound engineering judgment. An alternative is not prudent if:

- It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;
- It results in unacceptable safety or operational problems;
- After reasonable mitigation, it still causes:
  - Severe social, economic, or environmental impacts
  - Severe disruption to established communities
  - Severe disproportionate impacts to minority or low-income populations or
  - Severe impacts to environmental resources protected under other Federal statutes
- It results in additional construction, maintenance, or operational costs of an extraordinary magnitude
- It causes other unique problems or unusual factors or
- It involves multiple factors in [the list above], that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude

Section 9.5 of the Final EIS investigated feasible and prudent avoidance alternatives to the use of the Montlake Playfield and the Montlake Historic District. FHWA, in the ROD, determined that there is no feasible and prudent alternative to the use of these properties. None of the subsequent coordination, planning, and design advancement has identified a new alternative that would avoid the properties. FHWA’s determination remains applicable; therefore, FHWA and WSDOT must select the alternative with the least overall harm.
Finding of Least Overall Harm

In situations where FHWA concludes in the Section 4(f) evaluation that there is no feasible and prudent avoidance alternative and there are two or more alternatives that have a greater than de minimis use of a Section 4(f) property, a least overall harm analysis is necessary pursuant to 23 CFR 774.3(c). The 2011 Final EIS and Section 4(f) and 6(f) Evaluation identified the Preferred Alternative as the Least Overall Harm Alternative. As described in the Final EIS, there are no feasible and prudent alternatives that would completely avoid all Section 4(f)-protected property. In accordance with FHWA guidance (FHWA 2012), identifying which alternative would have least overall harm includes consideration of the following seven factors:

- The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property);
- The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection;
- The relative significance of each Section 4(f) property;
- The views of the officials with jurisdiction over each Section 4(f) property;
- The degree to which each alternative meets the purpose and need for the project;
- After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f); and
- Substantial differences in costs among the alternatives.

Not all factors are differentiators between all alternatives. Because the Preferred Alternative identified in the Final EIS was already identified as the Least Overall Harm Alternative, this analysis evaluates the project changes for potential change in harm relative to the Final EIS Preferred Alternative. The only Section 4(f)-protected properties with a greater than de minimis use where the revised design would differ from the Final EIS Preferred Alternative are the Montlake Playfield and Montlake Historic District.

Ability to Mitigate Adverse Impacts

The Final EIS identified measures to minimize harm to the Montlake Playfield, Bill Dawson Trail, and the Montlake Historic District. All of the identified measures would apply to the refined design as well as the Final EIS Preferred Alternative. One measure, to reconstruct the Bill Dawson Trail along a modified alignment within WSDOT right-of-way, would be implemented differently. The design changes maintain the accessible connections to the north and east that were identified in the Final EIS, but also provide for an additional connection to the west via the RSUP that is added in the refined design of the Portage Bay Bridge. Overall, the design changes provide an improvement to the Bill Dawson Trail relative to the Final EIS.

Relative Severity of the Remaining Harm

The consideration of remaining harm is limited to consideration of harm to the two properties, the Montlake Playfield and Montlake Historic District, with differing non-de minimis use, as supported by the following Section 4(f) guidance (FHWA 2012).
In situations where FHWA concludes in the individual Section 4(f) evaluation that there is no feasible and prudent avoidance alternative and there are two or more alternatives that use Section 4(f) property, a least overall harm analysis will be necessary pursuant to 23 CFR 774.3(c)... In such instances, while the de minimis impact will be considered in that analysis, the de minimis impact is unlikely to be a significant differentiating factor between alternatives because the net harm resulting from the de minimis impact is negligible.

The additional land required from Montlake Playfield would be used to provide improved bicycle and pedestrian connections to Montlake Playfield and the Bill Dawson Trail. These connections would be supportive of the activities, features, and attributes that qualify the park for protection under Section 4(f). Pending SHPO concurrence that there would be no additional adverse effect to the Montlake Historic District as a result of the project changes, there would be no increase in harm to Section 4(f) properties as a result of the proposed project changes.

**Relative Significance of Each Section 4(f) Property**

The same properties would be affected by the project design changes as by the Final EIS Preferred Alternative. There is no difference in the significance of properties between them.

**Views of the Officials with Jurisdiction**

WSDOT had consulted with the officials with jurisdiction, the City of Seattle Department of Parks and Recreation for parklands and the State of Washington SHPO for historic properties, for the Section 4(f)-protected properties that would be affected by the Portage Bay Bridge and Roanoke Lid phase. As documented in the following Coordination section of this draft Section 4(f) Evaluation, Parks supports the additional active transportation connections that occur within Interlaken Park and the Montlake Playfield. Pending SHPO concurrence that there would be no additional adverse effect to the Montlake Historic District as a result of the project changes, the SHPO agrees that the proposed project revisions would have no increased harm relative to the design included in the Final EIS.

**Degree to Which Each Alternative Meets the Purpose and Need**

Chapter 1 of the Final EIS documents the purpose of the project thus:

*The purpose of the project is to improve mobility for people and goods across Lake Washington within the SR 520 corridor from Seattle to Redmond in a manner that is safe, reliable, and cost-effective, while avoiding, minimizing, and/or mitigating impacts on affected neighborhoods and the environment.*

It elaborates on the project elements that meet the purpose, including “A regional bicycle/pedestrian path across Lake Washington with connections to existing bicycle and pedestrian facilities.” The extension of the RSUP west of Montlake and across the Portage Bay Bridge is a substantial extension of the connections provided for bicycle, pedestrian, and other active transportation users across Lake Washington. This revision is an improvement in meeting the purpose of the project relative to the Final EIS.
**Magnitude of Any Adverse Impacts to Resources not Protected by Section 4(f)**

The revised design would have a slightly greater impact to wetland and aquatic habitat as a result of the additional bridge width to provide the RSUP. The revisions would also have social and community benefits by providing additional pedestrian and active transportation connections to the Montlake Playfield, the Montlake Community Center, and points beyond via the RSUP continuing on SR 520 from Capitol Hill across Portage Bay and Lake Washington. Overall, while there would be differences in impacts and benefits between the Final EIS Preferred Alternative and the revised design, the differences would be small and would include trade-offs between areas of wetland and aquatic habitat and social and community connections.

**Substantial Differences in Costs**

The revised design would have a greater cost than the Final EIS Preferred Alternative because of the addition of the RSUP and local active transportation connections to the project. The increased cost would provide additional project benefit and would not be a substantial difference in cost relative to the overall $3.56 billion budget for the I-5 to Medina: SR 520 Bridge Replacement and HOV Project.

**Consideration of All Possible Planning to Minimize Harm**

The Final EIS documented measures to minimize harm, which remain valid at the overall the I-5 to Medina: SR 520 Bridge Replacement and HOV Project level and in relation to the Portage Bay Bridge and Roanoke Lid phase specifically. The project revisions addressed in this draft Section 4(f) Evaluation are a direct result of mitigation commitments included in the ROD (FHWA 2011) for continued coordination and collaboration on bike and pedestrian routes, urban design, and design of the Portage Bay Bridge. These ROD commitments were met through the Seattle Community Design Process that is summarized above. The process identified design refinements to improve active transportation recreational connections and reduce visual impacts of the replacement Portage Bay Bridge at nearby properties, including the Montlake Historic District. The project changes are the realization of the planning process reflected in the Final EIS and ROD commitments to minimize harm and revised design reflects all possible planning to minimize harm.

**Conclusion Regarding Least Overall Harm**

Overall, the difference in harm between the Final EIS Preferred Alternative and the revised design that incorporates the changes addressed in this evaluation would be small. The revised design would provide improved mitigation of effects on the Bill Dawson Trail. The alternatives would not differ in relative severity of remaining harm or significance of each property. The officials with jurisdiction are supportive of the revised design, and the revised design would be marginally more effective at meeting purpose and need. Differences in adverse impacts to resources not protected by Section 4(f) and the differences in costs would not be substantial. In summary, the revised design is the alternative with least overall harm.
Coordination

FHWA and WSDOT have engaged in consultation and coordination related to the Section 4(f)-protected properties considered in this evaluation. Public consultation that lead to the design changes, including inclusion of the RSUP, is described in the Summary of subsection above. Opportunity for public review and comment specific to the analysis and findings included in this draft Section 4(f) evaluation will be provided through:

- Availability of the draft Section 4(f) Evaluation on the project website for a minimum of 45 days.
- Public e-mail notification of the availability of the draft Section 4(f) Evaluation for review and comment to the SR 520 Bridge Replacement and HOV Program e-mail list of approximately 5,000 interested individuals and parties.
- Presentation of materials at an online open house to be posted during the 45-day public review and comment period.

The officials with jurisdiction for the affected properties are the City of Seattle Department of Parks and Recreation for parklands and the State of Washington SHPO for historic properties. WSDOT has consulted with these officials, as summarized in Table 4.

Prior to making a final determination, FHWA and WSDOT will obtain SHPO concurrence on the Section 106 determination covered in the August 5, 2020 letter. FHWA and WSDOT will also review comments received on this draft Section 4(f) Evaluation and share any comments related to parklands with Parks before requesting written concurrence on \textit{de minimis} impact and temporary occupancy exception findings on parklands.
Table 4. Summary Coordination with Officials with Jurisdiction over Section 4(f) Properties

<table>
<thead>
<tr>
<th>Form of Consultation</th>
<th>Date</th>
<th>Topics</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>City of Seattle Departments of Parks and Recreation</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Coordination Meeting</td>
<td>April 30, 2019</td>
<td>Design of connection to the RSUP, including integration of the City of Seattle bike lane on Delmar Drive East</td>
<td></td>
</tr>
<tr>
<td>Coordination Meeting</td>
<td>June 11, 2019</td>
<td>Design of the crosswalk at East Interlaken Boulevard and Delmar Drive East</td>
<td></td>
</tr>
<tr>
<td>Coordination Meeting</td>
<td>June 25, 2019</td>
<td>Design of RSUP connection at Delmar Drive East and integration with access to Interlaken Park via a new crosswalk at East Interlaken Boulevard and Delmar Drive East</td>
<td>Discussion of connections made possible by the RSUP, such as connection from North Capitol Hill to the Montlake Community Center</td>
</tr>
<tr>
<td>Coordination Meeting</td>
<td>August 20, 2019</td>
<td>Design of RSUP connection at Delmar Drive East and crosswalk at East Interlaken Boulevard and Delmar Drive East</td>
<td>Integration of the RSUP with the Bill Dawson Trail and access to the Montlake Playfield</td>
</tr>
<tr>
<td>Seattle Design Commission Briefing</td>
<td>November 7, 2019</td>
<td>RSUP connections to the City’s Bill Dawson Trail</td>
<td>Public testimony requested that the project provide improved connections to Montlake Playfield</td>
</tr>
<tr>
<td>Coordination Meeting</td>
<td>April 14, 2020</td>
<td>Integration of the RSUP with the Bill Dawson Trail and access to the Montlake Playfield</td>
<td></td>
</tr>
<tr>
<td><strong>State of Washington Historic Preservation Officer</strong></td>
<td></td>
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<tr>
<td>Letter</td>
<td>February 28, 2019</td>
<td>Consultation on expansion of APE and limits of construction in the vicinity of the I-5/SR 520 interchange</td>
<td>Included in Appendix A</td>
</tr>
<tr>
<td>Letter</td>
<td>March 11, 2019</td>
<td>SHPO concurrence on APE expansion</td>
<td>Included in Appendix A</td>
</tr>
<tr>
<td>Letter</td>
<td>July 17, 2019</td>
<td>Consultation on effect of project changes in the vicinity of the I-5/SR 520 interchange</td>
<td>Included in Appendix A</td>
</tr>
<tr>
<td>Letter</td>
<td>July 31, 2019</td>
<td>SHPO concurrence on No Adverse Effect</td>
<td>Included in Appendix A</td>
</tr>
<tr>
<td>Letter</td>
<td>June 11, 2020</td>
<td>Consultation on expansion of APE and limits of construction to include areas affected by project changes</td>
<td>Included in Appendix A</td>
</tr>
<tr>
<td>Letter</td>
<td>June 12, 2020</td>
<td>SHPO concurrence on APE expansion</td>
<td>Included in Appendix A</td>
</tr>
<tr>
<td>Letter</td>
<td>August 5, 2020</td>
<td>Consultation on evaluation of effects on historic properties of project changes and additional revision of limits of construction</td>
<td>Included in Appendix A</td>
</tr>
</tbody>
</table>
Preliminary Finding

In the Final EIS and ROD, FHWA concluded the following:

- There is no feasible and prudent alternative that completely avoids all Section 4(f) properties;
- The Selected Alternative causes the least harm to Section 4(f) properties and causes the least overall harm; and
- The Selected Alternative includes all possible planning to minimize harm.

These findings remain in place for the I-5 to Medina: SR 520 Bridge Replacement and HOV Project as a whole. Based on the analysis included in this draft Section 4(f) Evaluation, FHWA has preliminarily determined, pending the outcome of public and agency consultation, that:

- There would be de minimis impacts on Interlaken Park and the Roanoke Park Historic District; and
- The construction-phase effects on Roanoke Park would meet the temporary occupancy exception included in 23 CFR 774.13(d).

The revised project design would continue to use land from the Montlake Playfield and the Montlake Historic District. As documented in the Final EIS, there is no feasible and prudent alternative to the use of these properties. FHWA has also preliminarily determined that the revised project design would cause the least harm and that it includes all possible planning to minimize harm. There would be no change to other Section 4(f) findings included in the Final EIS and ROD.
References


WSDOT 2011a. SR 520 Bridge Replacement and HOV Program, I-5 to Medina: Bridge Replacement and HOV Project Final Environmental Impact Statement (EIS) and Section 4(f) and 6(f) Evaluation.


Appendix A
Correspondence
February 28, 2019

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Director, Department of Archaeology and Historic Preservation
1063 S. Capitol Way, Suite 106
Olympia, WA 98504-8343

RE: SR 520, I-5 to Medina Bridge Replacement and HOV Project: Updated Area of Potential Effects and Limits of Construction for SR 520/I-5 Express Lanes Connection Project and Reduction of Wetland Mitigation Sites

LOG #: 121602-08-FHWA

Dear Dr. Brooks:

Pursuant to the Programmatic Agreement Implementing Section 106 of the National Historic Preservation Act for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project (PA), the Washington State Department of Transportation (WSDOT), on behalf of the Federal Highway Administration (FHWA), is continuing consultation with your office.

As noted in the SR 520, I-5 to Medina Archaeological Treatment Plan, developed in consultation with you as a commitment of the above-referenced PA, WSDOT has identified project elements that require an expansion of the Area of Potential Effects (APE) and design refinements that modify the Limits of Construction (LOC). WSDOT has also achieved necessary wetland and aquatic mitigation credit for the entire SR 520 Program through redesigns that have substantially reduced impacts as well as the successful implementation of several aquatic mitigation sites. In coordination with the relevant regulatory agencies, WSDOT has determined that construction of the three remaining mitigation sites are no longer necessary and thus can be removed from the APE. In total, these changes will result in an overall reduction of the APE.

At this time, WSDOT, on behalf of FHWA, proposes to amend the Area of Potential Effects (APE) to address the following locations:

Expansion of Area of Potential Effects

Due to the addition of an extended transit/HOV connection at the I-5 Mercer Interchange, WSDOT proposes expanding the APE in the following locations:

1. I-5 Mercer Interchange (Figure 1a and 1b). In coordination with transit agency partners, WSDOT identified an opportunity to enhance transit/HOV connections between eastside communities and South Lake Union. Proposed project elements for this modified access include an auxiliary lane that will provide a reversible HOV direct access connection from Mercer Street to the I-5 express lanes by modifying the existing southbound I-5 express lane off-ramp to Mercer Street. This work will include construction of retaining walls; stormwater treatment facilities; grading, paving, and restriping for the reversible ramp and connections to I-5. This work will all be located within the existing I-5 right of way in...
previously disturbed areas, but will require expansion of both the APE and LOC along I-5 to Mercer Street.

Consistent with previous consultation, WSDOT has developed an amended APE that includes the anticipated construction footprint (including staging and laydown areas) and a buffer area (one property deep or 200 to 300 feet from the limits of construction, as appropriate; Figure 1a). The amended LOC includes the anticipated construction footprint, including all areas with potential for ground disturbing activities.

Additional built environment and archaeological assessments will be forthcoming for work in these areas, including any additional areas identified for inclusion based on consultation with interested tribes and other consulting parties.

As part of our treatment approach, standing buildings or structures within the expanded APE constructed before 1972 will be surveyed by a qualified architectural historian, including preparation of Historic Property Inventory forms, and evaluated as to eligibility for listing in the National Register of Historic Places (NRHP). Subsurface and other archaeological survey treatment approaches, developed in consultation with the Department of Archaeology and Historic Preservation, U.S. Army Corps of Engineers, King County Historic Preservation, and consulting tribes, are outlined in the SR520 Archaeological Treatment Plan.

Please note that WSDOT will be conducting geotechnical studies in this area as part of project planning. This work will be monitored by professional archaeologists and the information will be used to support the archaeological assessment.

2. **2414 and 2418 Federal Ave E (Figure 1d)**. WSDOT has identified that sub-surface tiebacks connecting to retaining walls in the right of way could extend further south than previously anticipated. To account for this, two additional properties require inclusion in the APE (Figure 1d). These structures, constructed in 1904 and 1949, respectively, have not yet been evaluated or documented with a Historic Property Inventory form. They will be included in the built environment assessment noted above in item 1.

**Reduction of Area of Potential Effects**

In coordination with the relevant regulatory agencies, WSDOT has determined that construction of the three remaining mitigation sites are no longer necessary and thus can be removed from the APE.

3. **Magnuson Park Mitigation Area (Figure 7-27)**. In coordination with and approved by the relevant regulatory agencies, this mitigation project, described in the Archaeological Treatment Plan (reference pages 7-65 through 7-75), will no longer serve as aquatic or wetland mitigation for the I-5 to Medina project. Therefore construction limits related to this work are no longer identified within the APE; WSDOT will not conduct archaeological or other additional historic properties inventory in this area. As no construction will occur at this location, WSDOT proposes to remove this site from the APE.

4. **Seward Park Mitigation Area (Figure 7-32)**. In coordination with and approved by the relevant regulatory agencies, this mitigation project, described in the Archaeological Treatment Plan (reference pages 7-76 through 7-86), will no longer serve as aquatic mitigation for the I-5 to Medina project. Therefore construction limits related to this work are no longer identified within the APE; WSDOT will not conduct archaeological or other
additional historic properties inventory in this area. As no construction will occur at this
description, WSDOT proposes to remove this site from the APE.

5. **Taylor Creek Mitigation Area** *(Figure 7-38).* In coordination with and approved by the
relevant regulatory agencies, this mitigation project, described in the Archaeological
Treatment Plan (reference pages 7-87 through 7-94), will no longer serve as aquatic
mitigation for the I-5 to Medina project. Therefore construction limits related to this work
are no longer identified within the APE; WSDOT will not conduct archaeological or other
additional historic properties inventory in this area. As no construction will occur at this
location, WSDOT proposes to remove this site from the APE.

**Amendment of Limits of Construction**

WSDOT proposes to amend the LOC at the following locations (please see attached Figures 1a-e for
reference):

a. **I-5 Mercer Interchange** *(Figure 1a).* This area is entirely within the expanded APE
described in item 1. Within this expanded LOC, work will include construction of retaining
walls along the existing ramps at Mercer, stormwater treatment facilities within the right of
way; grading, paving, and striping for the reversible ramp and connections. Along the I-5
express lanes, this work will predominantly include restriping along existing lanes. This
work will all be located within the existing I-5 right of way in previously disturbed areas.
As noted above, WSDOT will conduct additional assessments and consult with the
appropriate parties per the process outlined in the Archaeological Treatment Plan.

b/c. **I-5 Express Lanes** *(Figure 1b and 1c).* This portion of the expanded LOC includes areas
for restriping and is within the existing APE. WSDOT has determined, on behalf of
FHWA, that this work will be minor and will not result in any additional adverse effects.

d. **SR 520/I-5 interchange** *(Figure 1d).* This portion of the expanded LOC includes design
refinements to connect from I-5 to the future lid, including minor adjustments for
subsurface utility connections along East Roanoke Street within the existing APE. This
utility work is underground, involves temporary construction impacts, and does not result
in any permanent visible changes. This area is located along the edge of the National
Register of Historic Places (NRHP) listed Roanoke Park Historic District, but no aspect of
integrity would be altered or diminished as a result of these changes.

Along the mainline of I-5, the expanded LOC includes temporary construction staging
along the existing express lanes and restriping during construction. This work is entirely
within the existing I-5 right of way- all adjacent historic properties are at a higher elevation
and largely behind soundwalls and large vegetation. As such, no aspect of integrity would
be altered or diminished as a result of these changes.

South of SR 520 between I-5 and Delmar Drive East the LOC has expanded to include
space for additional retaining walls at the base of the slope, within WSDOT right of way.
As noted for the APE expansion above, tie-backs would extend in sub-surface easements
south of the SR 520 right of way, well below the existing structures.

e. **2209 East Lake Washington Blvd** *(Figure 1e).* WSDOT has recently purchased this
property and intends to use the detached garage as an information center to interact with the
local community regarding Montlake Project construction. The property will be returned to
residential use following SR 520 construction and is within the existing APE.
The garage has been determined to be a non-historic, non-contributing element to the Montlake Historic District. While minor physical modifications to the garage may occur, such as changing out the existing doors, the overall structure will remain intact and thus the changes will not substantially alter the integrity of setting or feeling for the District. Other changes to non-contributing elements of the property include removal of a portion of the non-historic, non-contributing fence along E North Street, and some minor regrading of the parking area in front of the garage to make the facility accessible per the Americans with Disabilities Act (ADA).

The house, which is a historic contributing element of the District, will continue to be maintained. The only proposed modification to the house is on the rear façade in order to temporarily replace double doors to the daylight basement, likely original to the home, with a single ADA compliant door to provide access to a basement restroom. The temporary door will be installed using the existing frame, and the historic doors will be stored and reinstalled prior to the end of the Project. WSDOT has determined, on behalf of FHWA, that these modifications will be minor and thus will not cause an additional adverse effect to historic properties.

We respectfully request any comments you may have on the revised limits of construction and APE by no later than March 28, 2019.

If you have any questions or concerns, please contact me at (206) 805-2895, e-mail manetac@wsdot.wa.gov, or Scott Williams, Cultural Resources Program Manager, e-mail willias@wsdot.wa.gov.

Sincerely,

Cassandra Manetas

WSDOT Cultural Resources Specialist

Attachments

Cc:

Dennis Wardlaw
Jeff Horton, FHWA
Sharon Love, FHWA
Scott Williams, WSDOT
Magnuson Park Mitigation Area

Aquatic Mitigation Type
- Yellow: Shoreline Enhancement
- Green: Riparian Enhancement
- Orange: Hard Structure Removal

Wetland Mitigation Type
- Light Purple: Road Removal by Seattle Parks
- Light Blue: Creation
- Light Green: Enhancement
- Light Yellow: Rehabilitation
- Light Pink: Buffer Enhancement

Figure 7-27
Proposed Mitigation Activities at Magnuson Park

Source: USDA NAIP (Washington 2009)
Figure 7-32
Proposed Mitigation Activities at Seward Park
Taylor Creek Mitigation Area

Aquatic Mitigation Type

- Stream Channel
- Fringe Emergent Wetland Creation
- Riparian Enhancement

Figure 7-38
Proposed Mitigation Activities at Taylor Creek
Figure 1.
SR 520 Program
Area of Potential Effects

Legend
- Existing Area of Potential Effects
- Existing Limits of Construction
- Area of Potential Effects Expansion
- Limits of Construction Expansion
Figure 1a.
SR 520 Program
Area of Potential Effects

Legend
- Existing Area of Potential Effects
- Existing Limits of Construction
- Area of Potential Effects Expansion
- Limits of Construction Expansion
Figure 1b.
SR 520 Program
Area of Potential Effects

Legend
- Existing Area of Potential Effects
- Existing Limits of Construction
- Area of Potential Effects Expansion
- Limits of Construction Expansion

Sources: Esri, HERE, USGS, Intermap, INCREMENTP, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community
Figure 1c.
SR 520 Program
Area of Potential Effects

Legend
- Existing Area of Potential Effects
- Existing Limits of Construction
- Area of Potential Effects Expansion
- Limits of Construction Expansion

Source: Washington State Department of Transportation

Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community
Figure 1e.
SR 520 Program
Area of Potential Effects

Legend
- Existing Area of Potential Effects
- Existing Limits of Construction
- Area of Potential Effects Expansion
- Limits of Construction Expansion

Legend
- Existing Area of Potential Effects
- Existing Limits of Construction
- Area of Potential Effects Expansion
- Limits of Construction Expansion

Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community.
March 11, 2019

Mrs. Cassandra Manetas
Cultural Resources Specialist
WA State Dept. of Transportation
999 Third Ave, Suite 2300
Seattle, WA.

In future correspondence please refer to:
Project Tracking Code: 121602-08-FHWA
Property: SR 520 Corridor Trans-Lake Washington, Bridge Replacement and HOV
Re: Revised APE Concur

Dear Ms. Manetas:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced project. In response, we have reviewed your description and map of the revised area of potential effect (APE).

We concur with your definition of the revised APE. Please provide us with your survey methodology before proceeding with any inventories. Along with the results of the inventory we will need to review your consultation with the concerned tribes, and other interested/affected parties. Please provide any correspondence or comments from concerned tribes and/or other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Should additional information about the project become available, our assessment may be revised.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw
Transportation Archaeologist
(360) 586-3085
dennis.wardlaw@dahp.wa.gov
July 17, 2019

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Director, Department of Archaeology and Historic Preservation
1063 S. Capitol Way, Suite 106
Olympia, WA 98504-8343

RE: SR 520, I-5 to Medina Bridge Replacement Project and HOV Project: I-5 APE Expansion
Determination of Effects

LOG #: 121602-08-FHWA

Dear Dr. Brooks:

Pursuant to the Programmatic Agreement Implementing Section 106 of the National Historic
Preservation Act for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project (PA), the
Washington State Department of Transportation (WSDOT), on behalf of the Federal Highway
Administration (FHWA), is continuing consultation with your office.

As you know, earlier this year WSDOT expanded our Area of Potential Effects (APE) and
Limits of Construction (LoC) to incorporate new project elements located at the interchange of I-5
with Mercer Street near Lake Union in Seattle. The purpose of this letter is to provide an
assessment of historic properties located within the expanded APE consistent with the
requirements in the project’s Archaeological Treatment Plan.

ICF International (ICF) has prepared the enclosed reports, also submitted via WISAARD, which
identify and evaluate historic built environment resources constructed prior to 1972 as well as
documents the archaeological assessment conducted in areas of new ground disturbance.

**Built Environment**

ICF identified five historic properties, one of which consists of two buildings on a single lot that
were previously determined eligible. Of these properties, ICF has recommended that two of the
newly identified properties be determined eligible for listing on the National Register and that
the documentation for the Ford Motor Company Assembly Plant, which was determined eligible
in 2007, be updated to reflect that the warehouse building has lost integrity since it was
originally documented. WSDOT concurs with these recommendations.

Most project activities in the vicinity of these eligible properties would be at least 300 feet away,
or include minor activities such as restriping on an elevated structure. The final configuration
would be consistent with existing conditions, and when coupled with existing best management
practices already required in the PA to minimize effects of construction, these new project
elements would not have an adverse effect on these historic properties. Thus, WSDOT, on behalf
of FHWA, has determined that the project will not have a new adverse effect.
Archaeological Assessment
ICF conducted archaeological monitoring of geotechnical borings in order to determine the potential for intact buried surfaces, per the Archaeological Treatment Plan. This work identified buried Holocene surfaces within the project area, but did not identify any archaeological sites. As such, ICF recommends archaeological monitoring for all ground disturbing activities with the potential to encounter buried Holocene landforms. WSDOT concurs with the recommendation for archaeological monitoring during construction. As no new sites have been identified, the project would have no new adverse effect.

We respectfully request your concurrence with these eligibility determinations, and that the construction of these new project elements has no additional adverse effect to historic properties. We request this concurrence and any additional comments or response you may have on the enclosed analysis by August 16, 2019.

If you have any questions or concerns, please contact me at (206) 805-2895, e-mail manetac@wsdot.wa.gov, or Scott Williams, Cultural Resources Program Manager, e-mail willias@wsdot.wa.gov.

Sincerely,

Cassandra Manetas
WSDOT Cultural Resources Specialist

Attachments
Cc:

Dennis Wardlaw, DAHP
Susan Wimberley, FHWA
Sharon Love, FHWA
Scott Williams, WSDOT
July 31, 2019

Mrs. Cassandra Manetas  
Cultural Resources Specialist  
WA State Dept. of Transportation  
999 Third Ave, Suite 2300  
Seattle, WA. 98104  

In future correspondence please refer to:  
Project Tracking Code: 121602-08-FHWA  
Property: SR 520 Corridor Trans-Lake Washington, Bridge Replacement and HOV  
Re: NO Adverse Effect  

Dear Mrs. Manetas:  

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. This action has been reviewed on behalf of the SHPO under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation contained in your communication.  

First, we concur with the results of the monitoring results of the geotechnical boring. We concur that the following historic properties are eligible for listing in the National Register of Historic Places: 

- PROPERTY: #87149 Ben Lomond Apartments  
- PROPERTY: #43238 Buffalo Building (Buffalo Shoe Manufacturing Company)  

We also concur that the following historic resources are not eligible for listing in the National Register of Historic Places:  

- PROPERTY: #44636 Ford Assembly Plant Building  
- PROPERTY: #718671 2414 Federal Ave E  
- PROPERTY: #355464 2418 Federal Ave E  

Finally, we concur that these new project elements will have "NO ADVERSE EFFECT" on historic properties within the APE that are listed in, or determined eligible for listing in, the National Register of Historic Places. As a result of our concurrence, further contact with DAHP on this proposal is not necessary.  

However, if new information about affected resources becomes available and/or the project scope of work changes significantly, please resume consultation as our assessment may be revised. Also, if any archaeological resources are uncovered during construction, please halt work immediately in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.
Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw
Transportation Archaeologist
(360) 586-3085
dennis.wardlaw@dahp.wa.gov
June 11, 2020

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Director, Department of Archaeology and Historic Preservation
1063 S. Capitol Way, Suite 106
Olympia, WA 98504-8343

RE: SR 520, I-5 to Medina Bridge Replacement and HOV Project: Updated Area of Potential Effects and Limits of Construction for SR 520/Portage Bay Bridge and Roanoke Lid Project

LOG #: 121602-08-FHWA

Dear Dr. Brooks:

Pursuant to the Programmatic Agreement Implementing Section 106 of the National Historic Preservation Act for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project (PA), the Washington State Department of Transportation (WSDOT), on behalf of the Federal Highway Administration (FHWA), is continuing consultation with your office.

As noted in the SR 520, I-5 to Medina Archaeological Treatment Plan, developed in consultation with you as a commitment of the above-referenced PA, WSDOT has identified project elements that require an expansion of the Area of Potential Effects (APE) and design refinements that modify the Limits of Construction (LOC).

At this time, WSDOT, on behalf of FHWA, proposes to amend the Area of Potential Effects (APE) and Limits of Construction (LOC) (Figure 1). New proposed project elements and design refinements for the Portage Bay Bridge and Roanoke Lid project will include: expanded retaining wall sub-surface tie-back areas, pedestrian/bicycle trail connections, sidewalk improvements, over-water work areas, and surface streets restoration. While much of the associated work will be located within the existing SR 520 right of way in previously disturbed areas, it will require expansion of both the APE and LOC in multiple locations (described in detail, below).

Consistent with previous consultation, WSDOT has developed an amended APE that includes the anticipated construction footprint (including staging and laydown areas) and, where appropriate, a buffer area (one property deep or 200 to 300 feet from the limits of construction). The amended LOC includes the anticipated construction footprint, including all areas with potential for ground disturbing activities.

Additional built environment and archaeological assessments will be forthcoming for work in these areas, including any additional areas identified for inclusion based on consultation with interested tribes and other consulting parties. As part of our treatment approach, standing buildings or structures within the expanded APE constructed before 1972 will be surveyed by a qualified architectural historian, including preparation of Historic Property Inventory forms, and evaluated as to eligibility for listing in the National Register of Historic Places (NRHP).

Areas of ground disturbance in the expanded LOC that are within the existing APE on the west side of Portage Bay Bridge and in the Roanoke Lid area were previously determined to have limited sensitivity for buried archaeological deposits based on findings in the 2011 SR 520 Bridge Replacement and HOV Program, I-5 to Medina: Bridge Replacement and HOV Project Archaeological Treatment Plan and the
2013 SR 520 Bridge Replacement and HOV Program, I-5 to Medina: Bridge Replacement and HOV Project Corridor Archaeological Landform Sensitivity Assessment. Therefore, no additional archaeological studies will occur in these locations (Figure 1a).

The area of ground disturbance in the expanded LOC that is within the existing APE in the Montlake Playfield (Figure 1b) is in an area that has elevated archaeological sensitivity, but where previous archaeological investigation of geotechnical borings revealed no archaeological deposits. Therefore, ground disturbance at this location will be monitored by professional archaeologists in accordance with the procedures outlined in the archaeological treatment plan, revised in the landform sensitivity assessment, and developed in consultation with the Department of Archaeology and Historic Preservation, U.S. Army Corps of Engineers, King County Historic Preservation, and consulting tribes.

Expansion of Area of Potential Effects

Due to the design refinements associated with the Portage Bay Bridge and Roanoke Lid project, WSDOT proposes expanding the APE in the following locations (Figure 1a):

1. 11th Avenue North of SR520. WSDOT has identified that sub-surface tie-backs connecting to retaining walls in the right of way could extend farther north than previously anticipated. To account for this, the APE has been expanded by approximately 50 feet north of the existing APE on 11th Avenue, between SR 520 to the south and E. Edgar Street to the north. This expansion includes one property (constructed in 1922) that has not yet been evaluated or documented with a Historic Property Inventory form. It will be included in the built environment assessment noted above.

2. 11th Avenue South of SR 520. WSDOT has identified that sub-surface tie-backs connecting to retaining walls in the right of way could extend farther south than previously anticipated. To account for this, the APE has been expanded approximately 60-165 feet south of the existing APE between Federal Avenue E. and 11th Avenue, as well as approximately 240-420 feet south of the existing APE between 11th Avenue and E. Interlaken Boulevard. This expansion includes four properties (constructed in 1905, 1924, 1926, and 1947, respectively) that have not yet been evaluated or documented with a Historic Property Inventory form. They will be included in the built environment assessment noted above.

Amendment to the Limits of Construction

WSDOT proposes to amend the LOC at the following locations:

1. Roanoke Lid and I-5 Connection (Figure 1a). This portion of the expanded LOC includes design refinements to connect from the new Portage Bay Bridge to the Roanoke lid, including minor adjustments for sidewalk connections along Delmar Drive E. and E. Interlaken Drive within the existing APE. The LOC has also been expanded to include space for retaining walls within WSDOT right of way. As noted for the APE expansion above, tie-backs would extend in sub-surface easements to the north and south of the SR 520 right of way, as well as near the intersection of Boylston Avenue E. and E. Roanoke Street west of I-5, well below the existing structures. North of SR 520, this includes areas along the southern edge of the National Register of Historic Places (NRHP) listed Roanoke Park Historic District, but no aspect of integrity would be altered or diminished as a result of these changes.

2. Portage Bay Bridge Over-water Span (Figures 1a, 1b). This area is entirely within the existing APE. This portion of the expanded LOC includes over-water locations on the north side of the bridge to accommodate tower crane aerial swing space over Queen City Yacht Club docks, as well as a small section on the southwest side of the bridge where the existing dock structure at the
Portage Bay Condominiums is in conflict with work areas. A section of the dock will be removed during construction and re-attached at the end of construction.

3. Montlake Playfield Path (Figure 1b). This area is entirely within the existing APE. Within this expanded LOC, work will include construction of pedestrian/bike connections from where the SR 520 Trail cross Portage Bay and its connection to the Bill Dawson Trail at the edge of Montlake Playfield.

As noted above, WSDOT will conduct additional assessments and consult with the appropriate parties per the process outlined in the Archaeological Treatment Plan.

We respectfully request any comments you may have on the proposed APE revision by no later than July 11, 2020.

If you have any questions or concerns, please contact me at (206) 714-7158, e-mail manetac@wsdot.wa.gov, or Scott Williams, Cultural Resources Program Manager, e-mail willias@wsdot.wa.gov.

Sincerely,

Cassandra Manetas
WSDOT Cultural Resources Specialist

Attachments

Cc:

Dennis Wardlaw
Sharon Love, FHWA
Lindsey Handel, FHWA
Scott Williams, WSDOT
June 12, 2020

Mrs. Cassandra Manetas  
Cultural Resources Specialist  
WA State Dept. of Transportation  
999 Third Ave, Suite 2300  
Seattle, WA. 98104

In future correspondence please refer to:  
Project Tracking Code: 121602-08-FHWA  
Property: SR520 Section 106 Historic Built Re-evaluation for I-5 Haul Routes  
Re: Revised APE Concur

Dear Mrs. Manetas:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced project. In response, we have reviewed your description and map of the revised area of potential effect (APE).

We concur with your definition of the revised APE. Please provide us with your survey methodology before proceeding with any inventories. Along with the results of the inventory we will need to review your consultation with the concerned tribes, and other interested/affected parties. Please provide any correspondence or comments from concerned tribes and/or other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Should additional information about the project become available, our assessment may be revised.

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

Sincerely,

[Signature]

Dennis Wardlaw  
Transportation Archaeologist  
(36) 586-3085  
dennis.wardlaw@dahp.wa.gov
August 5, 2020

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Director, Department of Archaeology and Historic Preservation
1063 S. Capitol Way, Suite 106
Olympia, WA 98504-8343

RE: SR 520, I-5 to Medina Bridge Replacement Project and HOV Project: I-5 APE Expansion
Determination of Effects

LOG #: 121602-08-FHWA

Dear Dr. Brooks:

Pursuant to the *Programmatic Agreement Implementing Section 106 of the National Historic
Preservation Act for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project* (PA), the
Washington State Department of Transportation (WSDOT), on behalf of the Federal Highway
Administration (FHWA), is continuing consultation with your office.

As you know, earlier this year WSDOT expanded our Area of Potential Effects (APE) to
incorporate expanded retaining wall sub-surface tie-back areas, pedestrian/bicycle trail
connections, sidewalk improvements, over-water work areas, and surface streets restoration. The
purpose of this letter is to provide an assessment of historic properties located within the
expanded APE consistent with the requirements in the project’s Archaeological Treatment Plan.

ICF International (ICF) has prepared the enclosed report, also submitted via WISAARD, which
identifies and evaluates historic built environment resources constructed prior to 1972 and
analyzes the archaeological probability using the methods from the 2013 Corridor Landform
Assessment.

**Built Environment**

Within the expanded APE, thirty-one properties were built prior to 1972. Of these, seven were
previously unevaluated for eligibility for listing on the National Register of Historic Places
(NRHP) and twelve were previously determined eligible, however these determinations were
more than ten years old and required confirmation of integrity.

ICF recommends that, of the seven previously unevaluated properties, one (2612 10th Ave E) is
eligible both individually and as a contributor of the Roanoke Park Historic District, one (2608
10th Ave E) is not individually eligible but is a contributor of the Roanoke Park Historic District,
and the other five are not eligible either individually or as contributors of a historic district. Table
1 below summarizes these recommendations as detailed in Attachment 1.
Table 1. Historic Built Property Eligibility Recommendations for Previously Unevaluated Properties

<table>
<thead>
<tr>
<th>Property Name, Address</th>
<th>Eligibility Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2612 10th Ave E</td>
<td>Recommended Individually Eligible; Contributor to Roanoke Park Historic District</td>
</tr>
<tr>
<td>2608 10th Ave E</td>
<td>Recommended Not Individually Eligible; Contributor to Roanoke Park Historic District</td>
</tr>
<tr>
<td>2610 11th Ave E</td>
<td>Recommended Not Individually Eligible: Recommended Not Eligible as a district contributor</td>
</tr>
<tr>
<td>2419 11th Ave E</td>
<td>Recommended Not Individually Eligible: Recommended Not Eligible as a district contributor</td>
</tr>
<tr>
<td>2413 11th Ave E</td>
<td>Recommended Not Individually Eligible: Recommended Not Eligible as a district contributor</td>
</tr>
<tr>
<td>2407 11th Ave E</td>
<td>Recommended Not Individually Eligible: Recommended Not Eligible as a district contributor</td>
</tr>
<tr>
<td>Seattle Preparatory School Campus, 2400 11th Ave E</td>
<td></td>
</tr>
<tr>
<td>McDonnell Hall</td>
<td>Recommended Not Individually Eligible: Recommended Not Eligible as a district contributor</td>
</tr>
<tr>
<td>Adelphia Memorial Hall (Payton Hall)</td>
<td>Recommended Not Individually Eligible: Recommended Not Eligible as a district contributor</td>
</tr>
</tbody>
</table>

Of the thirteen properties with updated Historic Property Inventory forms, ten remain eligible, one (Freeway Control Building, 811 E Roanoke St) remains not eligible, and one (914 E Miller St.) is no longer eligible due to a loss of integrity. The remaining property (Montlake Playfield, 1618 E Calhoun St.) was not individually evaluated in the past and is recommended not individually eligible due to loss of integrity, however it is still a contributing element of the Montlake Historic District. Table 2 below summarizes these recommendations.

Table 2. Historic Built Property Eligibility Update Recommendations for Previously Evaluated Properties

<table>
<thead>
<tr>
<th>Property Name, Address</th>
<th>Current NRHP Eligibility Status</th>
<th>Update NRHP Eligibility Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Seward Public School Complex, 2515 Boylston Ave E</td>
<td>Individually Eligible</td>
<td>No change: Individually Eligible</td>
</tr>
<tr>
<td>Freeway Control Office Building, 811 E Roanoke St</td>
<td>Not Individually Eligible; Not Contributor.</td>
<td>No change: Not Individually Eligible; Not Contributor.</td>
</tr>
<tr>
<td>2408 Broadway E</td>
<td>Individually Eligible</td>
<td>No change: Individually Eligible</td>
</tr>
<tr>
<td>Property Name, Address</td>
<td>Current NRHP Eligibility Status</td>
<td>Update NRHP Eligibility Recommendation</td>
</tr>
<tr>
<td>---------------------------</td>
<td>--------------------------------</td>
<td>--------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>904 E Miller St</td>
<td>Individually Eligible</td>
<td>No change: Individually Eligible</td>
</tr>
<tr>
<td>910 E Miller St</td>
<td>Individually Eligible</td>
<td>No change: Individually Eligible</td>
</tr>
<tr>
<td>914 E Miller St</td>
<td>Individually Eligible</td>
<td>Updated Recommendation: <em>Not Individually Eligible based on loss of integrity</em></td>
</tr>
<tr>
<td>Roanoke Park, 950 E Roanoke St</td>
<td>Not Individually Eligible; Contributor to Roanoke Park Historic District.</td>
<td>No change: Not Individually Eligible; Contributor to Roanoke Park Historic District.</td>
</tr>
<tr>
<td>1004 E Roanoke St</td>
<td>Individually Eligible; Contributor to Roanoke Park Historic District.</td>
<td>No change: Individually Eligible; Contributor to Roanoke Park Historic District.</td>
</tr>
<tr>
<td>1018 E Roanoke St</td>
<td>Individually Eligible; Contributor to Montlake Historic District</td>
<td>No change: Individually Eligible; Contributor to Montlake Historic District.</td>
</tr>
<tr>
<td>Montlake Park, 1618 E Calhoun St</td>
<td>Individually Eligible; Contributor to Montlake Historic District</td>
<td>No change: Individually Eligible; Contributor to Montlake Historic District.</td>
</tr>
<tr>
<td>Montlake Field House</td>
<td>Individually Eligible; Contributor to Montlake Historic District</td>
<td>No change: Individually Eligible; Contributor to Montlake Historic District.</td>
</tr>
<tr>
<td>Montlake Playfield</td>
<td>Unevaluated for Individual Eligibility; Contributor to Montlake Historic District</td>
<td>Updated Recommendation: <em>Not Individually Eligible; Contributor to Montlake Historic District</em></td>
</tr>
<tr>
<td>2575 W Montlake Pl E</td>
<td>Not Individually Eligible; Contributor to Montlake Historic District.</td>
<td>No change: Not Individually Eligible; Contributor to Montlake Historic District.</td>
</tr>
<tr>
<td>2571 W Montlake Pl E</td>
<td>Not Individually Eligible; Contributor to Montlake Historic District.</td>
<td>No change: Not Individually Eligible; Contributor to Montlake Historic District.</td>
</tr>
<tr>
<td>2553 W Montlake Pl E</td>
<td>Not Individually Eligible; Contributor to Montlake Historic District.</td>
<td>No change: Not Individually Eligible; Contributor to Montlake Historic District.</td>
</tr>
</tbody>
</table>

**Archaeological Assessment**

The expanded Limits of Construction (LoC) contains the footprint where project related ground disturbance is expected to occur. As these locations overlap with or are directly adjacent to areas previously tested as part of the SR 520 Program, ICF recommends that previously agreed to approaches be applied. As such, ICF recommends no additional archaeological review or monitoring is needed west of Portage Bay, however archaeological monitoring is recommended for work at the Montlake Playfield at the east end of Portage Bay. WSDOT concurs with these recommendations.
**Limits of Construction Update**

Additional project refinements have identified three additional locations where the LoC requires further refinement. These locations are shown in Attachment 2. North of SR 520, the LoC has been expanded at Boyer to accommodate replacement of an existing retaining wall within City of Seattle street right-of-way. South of SR 520, the LoC has been slightly adjusted at Delmar to include additional work access area, tie-in of pavement, and restriping needed for a sidewalk. Along Portage Bay, the Portage Bayshore condominiums have been added to allow for condition assessment and potential building protection measures based on ongoing coordination with the property owners. These condos were determined “not eligible” for the NRHP in 2013. All of these revisions are minor, within the existing APE, and would not adversely effect any aspects of integrity.

**Potential Effects**

While this assessment identified properties within the expanded LoC and APE that are eligible for the NRHP, either individually or as part of existing historic districts, the project activities leading to the expanded footprints are similar to those previously analyzed during development of the PA and would not substantially alter aspects of integrity that convey historical significance.

At the east end of Portage Bay, the location of revised trail connections at the Montlake Playfield are different than what was previously shown in this location; however, changes to setting are consistent with previously considered effects from the Portage Bay Project as a whole and support continued use of the existing recreational facilities at this location. While there are some changes in effects to setting and feeling from this new alignment, it would not be worse than what has previously been considered and would not result in a new adverse effect to the District or its contributing elements.

At the west end of Portage Bay, sidewalk refinements, subsurface utilities, and easements for deeply buried retaining wall tie backs would not directly affect integrity of historic properties, and temporary effects to setting would be addressed using existing minimization measures included within the PA, such as visual screening and vibration monitoring. One subsurface utility, a waterline vault at the edge of Roanoke Park, would have a minor permanent change to setting for the Park, but given the location adjacent to other utilities, the size of the vault in relation to the Park, as well as the District as a whole, and changes to the Park landscape design in recent years, this would not be adverse.

Thus, WSDOT, on behalf of FHWA, has determined that these revisions will not have a new adverse effect.

**Section 4(f)**

Based on your concurrence with the determination of No Adverse Effect to the Roanoke Park Historic District, WSDOT and FHWA intend to make a de minimis determination under Section 4(f) for the revisions within the Roanoke Park Historic District. WSDOT and FHWA have also
determined that the current alternative has no increased harm to the Montlake Playfield per Section 4(f). Your concurrence that the revision to the Montlake Playfield documented in this report does not result in new adverse effects for the undertaking serves as concurrence with this determination.

**Request for Concurrence**
We respectfully request your concurrence with these eligibility determinations, and that the construction of these revisions has no additional adverse effect to historic properties. We request this concurrence and any additional comments or response you may have on the enclosed analysis by **September 4, 2020**.

If you have any questions or concerns, please me at (206) 714-7158, e-mail manetac@wsdot.wa.gov, or Scott Williams, Cultural Resources Program Manager, e-mail willias@wsdot.wa.gov.

Sincerely,

Cassandra Manetas

WSDOT Cultural Resources Specialist

Attachments

Cc:
- Dennis Wardlaw, DAHP
- Lindsey Handel, FHWA
- Sharon Love, FHWA
- Scott Williams, WSDOT
Memorandum

Date: August 5, 2020

To: Washington State Department of Transportation
    Cassandra Manetas, Cultural Resources Specialist
    WSDOT ESO MegaProjects
    999 Third Ave., Suite 2300
    Seattle, WA 98109

From: January Tavel, ICF Principal Investigator/Lead Author;
      ICF Contributing Authors: Tait Elder, Senior Archaeologist, and Alex Ryder, Architectural Historian

Subject: Cultural Resources Section 106 Re-evaluation Technical Memo for SR 520 I-5 to Montlake – I/C and Bridge Replacement (Portage Bay Bridge and Roanoke Lid Phase) (Project Tracking Code: 121602-08-FHWA)

Introduction

The purpose of this Cultural Resources Section 106 Re-evaluation Technical Memo is to assess potential effects on historic built properties in the expanded Area of Potential Effects (APE) for the SR 520 I-5 to Montlake – I/C and Bridge Replacement (Portage Bay Bridge and Roanoke Lid Phase). This memo describes the project overview; location, expanded Limits of Construction (LOC) and expanded APE; methods for assessing archaeological sensitivity in the expanded limits of construction and expanded APE; methods for identifying, documenting, and evaluating historic properties within the expanded APE; findings associated with the archaeological sensitivity analysis; findings associated with historic built resources investigations and eligibility evaluations; an assessment of the potential for proposed project changes to affect historic properties; and conclusions and recommendations regarding next steps for compliance under Section 106 of the National Historic Preservation Act. Based on the analysis here, a finding of “no new adverse effect” for the undertaking as a whole is recommended.

Program Phase Overview

The Portage Bay Bridge and Roanoke Lid Phase of the State Route (SR) 520, Interstate (I)-5 to Medina Bridge Replacement and High-Occupancy Vehicle (HOV) Project, Rest of the West Program, would replace the Portage Bay Bridge and construction the Roanoke Lid, connecting the bridge to I-5. These project activities were analyzed in the 2011 SR 520, I-5 to Medina: Bridge Replacement and HOV Project Final Environmental Impact Statement and Final Section 4(f) and 6(f) Evaluations (Federal Highway Administration and Washington State Department of Transportation 2011a).
Since completion of the environmental analysis in 2011, WSDOT has advanced the I-5 to Medina: SR 520 Bridge Replacement and HOV Project, including completion of several phases of construction; coordination with the City of Seattle, local residents, and stakeholder; and acquisition of right of way from the National Oceanic and Atmospheric Administration (NOAA). During this time, the design of the Portage Bay Bridge, Roanoke Lid, and other components in the Portage Bay to I-5 Area have been refined through a community design process and coordination with the Seattle Design Commission in 2019. New proposed project elements and design refinements for the Portage Bay Bridge and Roanoke Lid project would include: expanded retaining wall subsurface tieback areas, pedestrian/bicycle trail connections, sidewalk improvements, over-water work areas, and surface streets restoration.

**Expanded Area of Potential Effects and Limits of Construction**

WSDOT, on behalf of the Federal Highway Administration, proposed to amend the APE (see Appendix A, Figure 1, Area of Potential Effects and Limits of Construction) to address new work associated with subsurface tiebacks connecting to retaining walls in the vicinity of 11th Avenue north of SR 520 and south of SR 520; as well as design refinements associated with the Roanoke Lid and I-5 Connection, Portage Bay Bridge Over-Water Span, and Montlake Playfield Path. To do so, WSDOT amended the LOC and expanded the APE by applying an approach consistent with prior consultation for the SR 520 program, to include the anticipated construction footprint (including staging and laydown areas) and a buffer area (one property deep or 200 to 300 feet from the LOC), as appropriate. The construction footprint is the LOC, and the APE buffer area is intended to account for indirect effects.

The APE and LOC have been expanded in the following ways.

- **Roanoke Lid and I-5 Connection.** This portion of the expanded LOC includes design refinements to connect from the new Portage Bay Bridge to the Roanoke Lid, including minor adjustments for sidewalk connections along Delmar Drive East and East Interlaken Drive within the existing APE. The LOC has also been expanded to include space for retaining walls within WSDOT right of way. As noted for the APE expansion above, tiebacks would extend in subsurface easements to the north and south of the SR 520 right of way, as well as near the intersection of Boylston Avenue East and East Roanoke Street west of I-5, well below the existing structures. North of SR 520, this includes areas along the southern edge of the National Register of Historic Places (NRHP)-listed Roanoke Park Historic District, but no aspect of integrity would be altered or diminished as a result of these changes.

- **11th Avenue North of SR 520.** WSDOT has identified that subsurface utilities and sidewalk work, as well as subsurface tiebacks connecting to retaining walls in the right of way could extend farther north than previously anticipated. To account for this, the APE has been expanded by approximately 50 feet north of the existing APE on 11th Avenue, between SR 520 to the south and East Edgar Street to the north.
- 11th Avenue South of SR 520. WSDOT has identified that subsurface utilities and sidewalk work, as well as subsurface tiebacks connecting to retaining walls in the right of way could extend farther south than previously anticipated. To account for this, the APE has been expanded approximately 60–165 feet south of the existing APE between Federal Avenue East and 11th Avenue, as well as approximately 240–420 feet south of the existing APE between 11th Avenue and East Interlaken the Boulevard.

- Portage Bay Bridge Over-Water Span. This area is entirely within the existing APE. This portion of the expanded LOC includes over-water locations on the north side of the bridge to accommodate tower crane aerial swing space over Queen City Yacht Club docks, as well as a small section on the southwest side of the bridge where the existing dock structure at the Portage Bay Condominiums is in conflict with work areas. A section of the dock would be removed during construction and reattached at the end of construction.

- Montlake Playfield Path. This area is entirely within the existing APE. Within this expanded LOC, work would include construction of pedestrian/bike connections from where the SR 520 Trail crosses Portage Bay and its connection to the Bill Dawson Trail at the edge of Montlake Playfield.

This expanded APE, and the LOC that encompasses the anticipated construction footprint and all areas with potential for ground-disturbing activities, received Department of Archaeology and Historic Preservation (DAHP) concurrence on June 12, 2020 (Appendix B, Correspondence).

Approach and Methods

Archaeological Sensitivity Assessment Methods

Per the analytical framework presented in *SR 520 Bridge Replacement and HOV Program, I-5 to Medina: Bridge Replacement and HOV Project Corridor Archaeological Landform Sensitivity Assessment* (Elder and Cascella 2013), landforms determined by ICF’s geoarchaeologist to be Pleistocene-aged or older are considered to have limited potential to contain archaeological resources. Landforms formed during the Holocene epoch are considered to have the potential to contain archaeological resources. The highest degree of archaeological sensitivity is assigned to landforms that retain Holocene-aged surfaces, as indicated by the presence of a buried A-horizon or topsoil layer.

Historic Built Environment Methods

Previously Recorded Historic-Age Properties

The Washington Information System for Architectural and Archaeological Records Database (WISAARD) contains all cultural resources records and reports written since 1995 that are on file with DAHP. A WISAARD record search was conducted to identify known historic properties present in the expanded APE. Twenty-seven previously recorded properties were identified. These are summarized in Table 1.
A review of year-built information available via King County Assessor parcel data yielded four additional historic-age properties in the expanded LOC and expanded APE that did not have existing WISAARD Historic Property Inventory (HPI) records. These are summarized in Table 2. Parcels identified via King County Assessor data within the expanded LOC and expanded APE that did not meet the age-eligibility threshold or were vacant are not included in the tables below.

Table 1. Summary of Historic Built Properties in the Expanded LOC and Expanded APE Previously Recorded in WISAARD

<table>
<thead>
<tr>
<th>Assessor Parcel Number</th>
<th>HPI Property ID</th>
<th>Property Name</th>
<th>Property Address</th>
<th>Year Built</th>
<th>NRHP Eligibility Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>NA</td>
<td>720661</td>
<td>Portage Bay Bridge</td>
<td>NA</td>
<td>1963</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>8805900475</td>
<td>96628</td>
<td>Residence</td>
<td>2563 W Montlake Pl E</td>
<td>1937</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>1959700630</td>
<td>96628</td>
<td>Residence</td>
<td>1106 E Roanoke St</td>
<td>1965</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>1912100300</td>
<td>96628</td>
<td>Residence</td>
<td>2423 11th Ave E</td>
<td>1910</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>1912100374</td>
<td>96628</td>
<td>Residence</td>
<td>2414 Federal Ave E</td>
<td>1904</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>1912100381</td>
<td>96628</td>
<td>Residence</td>
<td>2418 Federal Ave E</td>
<td>1949</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>1912100390</td>
<td>96628</td>
<td>Residence</td>
<td>2422 Federal Ave E</td>
<td>1907</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>1912101190</td>
<td>96628</td>
<td>Residence</td>
<td>2415 10th Ave E</td>
<td>1987</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>1912101200</td>
<td>96628</td>
<td>Residence</td>
<td>2409 10th Ave E</td>
<td>1921</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>1912101215</td>
<td>96628</td>
<td>Residence</td>
<td>2405 10th Ave E</td>
<td>1909</td>
<td>Not Eligible</td>
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<td>1912101225</td>
<td>96628</td>
<td>Residence</td>
<td>2401 10th Ave E</td>
<td>1909</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>5535100335</td>
<td>96621</td>
<td>Residence</td>
<td>2412 Broadway E</td>
<td>1910</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>6861900000</td>
<td>96621</td>
<td>Residence</td>
<td>2524 Boyer Ave E</td>
<td>1958</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>5535100285</td>
<td>44344</td>
<td>Freeway Control Office Building</td>
<td>811 E Roanoke St</td>
<td>1965</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>6788202280</td>
<td>42935</td>
<td>Montlake Field House</td>
<td>1618 E Calhoun St</td>
<td>1935</td>
<td>Not Individually Eligible; Contributor to Montlake Historic District</td>
</tr>
<tr>
<td>6788202280</td>
<td>719887</td>
<td>Montlake Playfield</td>
<td>1618 E Calhoun St</td>
<td>1935</td>
<td>Unevaluated for Individual Eligibility; Contributor to Montlake Historic District</td>
</tr>
<tr>
<td>8805900445</td>
<td>96683</td>
<td>Residence</td>
<td>2575 W Montlake Pl E</td>
<td>1951</td>
<td>Not Individually Eligible; Contributor to Montlake Historic District</td>
</tr>
<tr>
<td>8805900455</td>
<td>96682</td>
<td>Residence</td>
<td>2571 W Montlake Pl E</td>
<td>1938</td>
<td>Not Individually Eligible; Contributor to Montlake Historic District</td>
</tr>
<tr>
<td>8805900470</td>
<td>96680</td>
<td>Residence</td>
<td>2553 W Montlake Pl E</td>
<td>1936</td>
<td>Not Individually Eligible; Contributor to Montlake Historic District</td>
</tr>
</tbody>
</table>
Table 2. Summary of Historic-Age Built Properties in the Expanded LOC and Expanded APE Previously Recorded in King County Assessor’s Parcel Records

<table>
<thead>
<tr>
<th>Assessor Parcel Number</th>
<th>Property Name</th>
<th>Property Address</th>
<th>Year Built</th>
<th>NRHP Eligibility Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1959700615</td>
<td>Residence</td>
<td>2610 11th Ave E</td>
<td>1922</td>
<td>Unevaluated</td>
</tr>
<tr>
<td>1912100305</td>
<td>Residence</td>
<td>2419 11th Ave E</td>
<td>1905</td>
<td>Unevaluated</td>
</tr>
<tr>
<td>1912100325</td>
<td>Residence</td>
<td>2413 11th Ave E</td>
<td>1947</td>
<td>Unevaluated</td>
</tr>
<tr>
<td>1912100335</td>
<td>Residence</td>
<td>2407 11th Ave E</td>
<td>1924</td>
<td>Unevaluated</td>
</tr>
</tbody>
</table>
Previously Recorded Historic Districts

The National Park Service (NPS) NRHP records are available via the NPS Gallery Digital Asset Search. A record search was conducted to identify known NRHP-listed historic districts present in the expanded APE. Two historic districted are listed in the NRHP. These are summarized in Table 3.

Table 3. Summary of NRHP Listed Historic Districts

<table>
<thead>
<tr>
<th>NR Number</th>
<th>Property Name</th>
<th>NR Boundary Description</th>
<th>Period of Significance</th>
<th>Contributing Properties</th>
<th>NRHP Criteria</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>09000578</td>
<td>Roanoke Park Historic District</td>
<td>Roughly bounded by Shelby St on the north, Roanoke St on the south, Harvard Ave on the west, and 10th Ave on the East</td>
<td>1899–1939</td>
<td>Contributing: 78 buildings, 1 site, 55 structures; Non-contributing: 21 buildings, 22 structures</td>
<td>A, C</td>
<td>Direct association with events that made a significant contribution to the broad patterns of history; and collection of early 20th century residential architecture</td>
</tr>
</tbody>
</table>

Archival Research

In addition to referencing existing historical contexts in the SR 520 Bridge Replacement and HOV Program, I-5 to Medina: Bridge Replacement and HOV Project Section 106 Technical Report: Volume 2 Built Environment (Grey et al. 2011), and the SR 520, I-5 to Medina: Bridge Replacement and HOV Project Cultural Resources Assessment Discipline Report (Federal Highway Administration and Washington State Department of Transportation 2011a), ICF conducted supplementary research to support historic property identification and property-specific significance analysis. Sources consulted included historical maps, photographs, and secondary historical writings. Research was conducted at the following repositories:

- King County Archives
- Seattle Municipal Archives
- Online research consisted of reviewing the following resources:
Sanborn Fire Insurance maps and archived historical newspaper articles available through the Seattle Public Library

- Research published by the nonprofit online encyclopedia HistoryLink
- Property reports available through the King County Parcel Viewer

**Historic Context**

The following abbreviated historic context is summarized, in part, from the *SR 520 Bridge Replacement and HOV Program, I-5 to Medina: Bridge Replacement and HOV Project Archaeological Treatment Plan* (ICF International 2011), with additional information included from historical research conducted by ICF historians.

**Capitol Hill Neighborhood**

The Capitol Hill neighborhood is bounded by Fuhrman Avenue East on the north, I-5 on the west, East Pike Street on the south, and 24th Avenue East on the east. It is located on a long ridge overlooking downtown, and was named by the neighborhood's primary developer, James Moore, in 1901 (Williams 2001:13–15). Moore was a successful developer who marketed the exclusive character of the area to attract elite Seattleites. By 1913, enough mansions lined 14th Avenue North to earn it the nickname "Millionaire's Row." Each estate was individually designed, primarily by well-known architects, in lavish grandeur and in a wide range of architectural styles, including Tudor Revival, Georgian Revival, Classic Revival, Queen Anne, English Cottage, Classic Box, and Craftsman. As transportation to the area improved, the neighborhood became accessible to a broader range of Seattle residents. As a result, the area grew rapidly and the character of the neighborhood began to change from only elite, single-family homes, to include numerous multifamily structures. Housing types were placed adjacent to one another, sometimes with grand houses next to new apartment dwellings. These apartments featured upscale designs and quality construction in an effort to attract the growing middle class, discourage poor tenants, and overcome the prejudice of surrounding mansion dwellers. Capitol Hill's busiest cultural and commercial district developed along Broadway between Pike and Roy Street. Between East Republican Street and East Harrison Street, a block-long Broadway Market was completed in 1928. With a collection of independently owned small shops, the Broadway Market was a progenitor of the modern-day supermarket, soon copied by the Safeway Corporation and other large companies. To address increasing housing and retail needs, Broadway Avenue was redeveloped into a medium-density community. Although the area now serves residents with a broader mix of incomes, it is considered a desirable Seattle neighborhood. Today, Capitol Hill is bounded by Fuhrman Avenue East on the north, I-5 on the west, East Pike Street on the south, and 24th Avenue East on the east (Williams 2001:19, 24–26, 33, 38, 63–65, 128, 158–159, 175; Wilson 1992:D3).

**Eastlake Neighborhood**

The Eastlake neighborhood, bounded by Lake Union to the west and north, I-5 to the east, and East Blaine Street to the south. In the late 1800s, the area around Lake Union emerged as one of Seattle's early industrial centers. A few scattered settlers and speculators developed the land around the lake during the 1870s, sparked by progress in the burgeoning coal industry. Industrial development in Seattle and around Lake Union continued to increase in the 1880s with the completion of the
transcontinental railroad in 1883. During this time, railroads, electric street cars, and boat launches made all of Lake Union accessible for the first time. By the 1890s, the land along Lake Union’s shores was platted, and in 1891, the Eastlake neighborhood was annexed into the city of Seattle. During this time, the timber industry was Eastlake’s primary industry; many furniture manufacturers, box and barrel makers, and board and paper processors were established on Lake Union during this period. In 1911, construction began on the Lake Washington Ship Canal to connect Lake Union with Puget Sound, increasing Lake Union’s prominence as an industrial center and bringing even more workers into the Eastlake neighborhood. Completion of the Montlake Cut in 1916 and the Salmon Bay locks in 1917 enabled uninhibited ship movements from Lake Washington to Puget Sound through Lake Union. This greater accessibility attracted even more industry to the Eastlake area. Soon thereafter, electricity plants, ship dry docks, and airplane manufacturers appeared. The shipbuilding boom ended following World War II, and the neighborhood shifted to a service focus with offices, restaurants, boat repairs, and apartments lined up next to one another. The construction of I-5 in the early 1960s divided Eastlake from the Roanoke and Capitol Hill neighborhoods to the east, required demolition of hundreds of homes and businesses, and introduced heavy traffic, noise, and pollution from the related bridges and ramps. Eastlake recovered, however, and by 1994 the neighborhood was used as a model for the City’s Comprehensive Plan promoting “urban villages like Eastlake.” The neighborhood’s proximity to downtown Seattle helped maintain a residential population as the former industrial developments were replaced or renovated to support marinas, upscale restaurants, and other business activities. Eastlake Avenue remains a commercial street spine where residential units slope gently toward the lake (Bagley 1916a; Droker 1977; Goodyear 1887; Morrow 1994; Dorpat 1987).

Montlake Neighborhood and Historic District

The Montlake neighborhood is bounded by the Washington Park Arboretum to the east, the Portage Bay neighborhood to the west, the Montlake Cut on the north, and Interlaken Park and Interlaken Boulevard to the south. The community was first conceived—under the name “Union City”—in the 1860s and 1870s. Early plans to develop the area faltered, however, and it was not until the early 20th century that development in the area really took off. In 1909, the area came into the hands of James M. Corner, who hired two brothers—Calvin and William Hagan—to administer the architectural and real estate tasks needed to develop the land. The Hagan brothers re-platted the area, changed the proposed street names, and renamed the community the Montlake Park Addition to capture the excellent potential for mountain views from its lots. About that same time, the Alaska-Yukon-Pacific Exposition, which was sited just to the north, brought various transportation improvements, including a new road and trolley lines, transforming the area into a convenient suburb of Seattle. In the years that followed, the Hagans planned and oversaw the installation of paved streets and utilities including water, sewer, gas, and electric, as well as the sale of the lots. And several years after the Exposition, a canal connecting Lake Washington with Lake Union was built, resulting in the north end of the neighborhood becoming waterfront property. The neighborhood’s early development emphasized no one architectural style, but instead reflected both the individual tastes of property owners as well as the wide range of styles that were popular in the early 20th century. Perhaps the largest change to the neighborhood in the second half of the 20th century was the construction of SR 520, which was finished in 1962. Although the Montlake community was unable to stop the freeway’s construction, it did ward off plans to widen the bridge over the Montlake Cut, to remove the center strips of Montlake Boulevard East, and the completion of the R.H. Thomson Expressway, which would have cut through the Arboretum. The highway that was built, however, brought increased traffic through the community. The Montlake Historic District was
listed in the NRHP in June 2015. There are 1,619 buildings, sites, and structures in the district, 1,242 of which are contributing elements. The period of significance is 1905–1959, and it is listed as significant under Criterion C for being a "cohesive and highly intact collection of early 20th century houses that reflect the architectural styles typical of this period in Seattle's development (Sherwood 1974; Smith 2004:11–15, 29–30, 93–112, 183–195; Baker 2006:11; WSDOT 2015:3–9)."

**Portage Bay Neighborhood**

The Portage Bay neighborhood extends along the western shore of Lake Union's eastern arm. This portion of the lake was named "Portage Bay" by the Seattle Port Commission in 1913 to prevent confusion with the more popularly known main portion of the lake. The Portage Bay neighborhood developed along the edge of this bay, occupying the lower topography of today's Fuhrman Avenue East and Boyer Avenue East (originally platted 12th Avenue East), east of I-5. Relatively isolated on the far side of Capitol Hill, the Portage Bay neighborhood developed later than the neighboring, higher elevation areas. The neighborhood was platted by various developers starting in the early 1890s and experienced some development in the first two decades of the 20th century, including essential water, sewer, and roadway improvements. Once these were completed, development of the area proceeded rapidly, and by 1924 approximately 70 percent of the neighborhood's lots were occupied by new homes. Residential development then slowed in the 1930s and 1940s—thanks to the effects of the Great Depression and then World War II—and many lots remained unfilled. However, following these events, the neighborhood experienced a second wave of development, starting in the 1950s. At this time, the neighborhood witnessed the erection of many large, modern residences. These were typically built on empty lots but were occasionally built on the lots of older homes cleared away for the purpose. The Portage Bay neighborhood has maintained its status as a quiet, primarily single-family residential area since the 1950s (Lewis Publishing Company 1903; Baist 1905, 1912; Kroll Map Co. 1920, 1924; Thrush 2007; King County Department of Assessments 2010; Gilbert 1989; Marsh 2005; Hooper 1947; Kraus 1985).

**Roanoke Park Historic District**

Roanoke Park Historic District is bounded by East Shelby Street in the north, Harvard Avenue East to the west, East Roanoke Street to the south, and 10th Avenue East to the east. The community is perched on a relatively flat plateau with precipitous drops on three sides and a steep upward slope to the south toward Capitol Hill. As a result, the neighborhood stands separate from the surrounding residential areas. The area was originally platted in 1890 under the partnership of David Denny and Henry Fuhrman. Denny was one of Seattle's earliest settlers and Fuhrman, a native of Germany, was a successful businessman who had made his way across the United States until he settled with his family in Seattle in 1890. Together, Denny and Fuhrman platted 160 acres along Lake Union. The first development in the area was an electric trolley line built by Denny in 1891. A branch from the Eastlake line, the trolley line ran up Broadway, terminating at East Lynn. Shortly thereafter in 1899, the first home was constructed in Roanoke Park. It was not until after the turn of the century, however, that the area saw more significant development, when the electric trolley line was extended through the area and Roanoke Park was created. Attracted by the transportation options and elegant park, many homes were soon built for Seattle's influential elite in Roanoke Park. Often designed by notable local architects, the homes reflected a diverse collection of early 20th century architecture. By 1939, the neighborhood was largely developed. In the 1960s, the setting of the Roanoke Park neighborhood was altered by construction of I-5 on the west edge of the district and
then SR 520 just south of the district. In spite of its many hardships, the community experienced a period of rejuvenation after the 1970s as “the Roanoke Park district became a well-kept secret to the mostly longtime resident families who continued to love it and who had developed a long-standing tradition of celebrating it and striving to perfect it notwithstanding the size of the challenge when confronted with the huge machinations of progress” (O’Connor et al. 2009:8–19). The Roanoke Park Historic District was listed in the NRHP in July 2009. There are 101 properties in the district, 80 of which are contributing elements, including Roanoke Park itself and the individually listed William H. Parsons House. The period of significance is 1899–1939 and the neighborhood is listed under NRHP Criterion A for direct association with events that made a significant contribution to the broad patterns of local and national history and Criterion C for its collection of early 20th century residential architecture designed by notable Seattle architects (DAHP 2009:2–3; O’Connor et al. 2009; Lewis Publishing Company 1903:488; Crowley 1998; Sherwood 1974; Diller 1915:10).

Survey Methods

The historic built environment survey involved identifying, examining, and evaluating all buildings and structures in the APE built in or before 1972. The date of 1972 was selected as the threshold for identifying age-eligibility consistency with the SR 520, I-5 to Medina: Bridge Replacement and HOV Project Final Environmental Impact Statement and Final Section 4(f) and 6(f) Evaluations. Construction dates for properties in the survey population were established using data from the King County Tax Assessor records and confirmed based on visual inspection. Properties built in or before 1972 were identified in the field, and information was collected about the existing condition of their physical characteristics. The data collected included one or more photographs of each property from the public right of way, the architectural style of each resource (if identifiable), the type and materials of significant features, and the existence of alterations and overall physical integrity.

Archaeological Sensitivity Findings

On the west side of Portage Bay Bridge and the Roanoke Lid, proposed areas of ground disturbance in the expanded LOC are in areas that were previously determined to have limited sensitivity for buried archaeological deposits (Elder and Cascella 2013). Therefore, the findings of the previous study will be applied in the Conclusions and Recommendations sections herein, meaning that no additional archaeological studies will occur in these locations.

On the east side of the Portage Bay Bridge, proposed areas of direct ground disturbance in the expanded LOC are adjacent to areas that were previously determined to have sensitivity for containing buried archaeological resources (Elder and Cascella 2013). Review of geologic maps available from the national geologic map database (USGS 2020) reveals that the expanded LOC includes that it is located on the same Holocene-aged landform described by Elder and Cascella (2013). As a result, the findings of the previous study will be applied in the Conclusions and Recommendations sections herein. This means that archaeological monitoring will be recommended in this portion of the expanded LOC, which is consistent with Elder and Cascella’s (2013) archaeological recommendations for other areas identified as being archaeologically sensitive.
Historic Built Environment Findings

Survey Results

The historic built environment survey identified and documented 20 historic-age properties in the expanded LOC and expanded APE on July 1, 2020, and July 6, 2020. This included 7 previously unevaluated historic-age properties and 13 properties that were previously evaluated for NRHP eligibility. Of the previously evaluated properties, 12 were determined eligible with concurrence from DAHP and field-checked to confirm integrity. The final property, Freeway Control Office Building at 811 East Roanoke Street, was previously determined not eligible, but field-checked to meet DAHP documentation standards. Table 4 summarizes details for each of the seven previously unevaluated properties. Table 5 summarizes details for each of the 13 previously evaluated properties documented as part of the 2020 field survey efforts. Appendix C, Figure 2a-c, Portage Bay Bridge and Roanoke Lid Phase Historic Built Properties, provides the location of these resources based on Map ID assignments in Table 4 and Table 5.

Table 4. Summary of Previously Unevaluated Historic Built Properties Surveyed

<table>
<thead>
<tr>
<th>Map ID</th>
<th>Assessor Parcel Number</th>
<th>HPI Property ID</th>
<th>Property Name, Address</th>
<th>Property Type</th>
<th>Year Built</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1959700505</td>
<td>670293</td>
<td>2612 10th Ave E</td>
<td>Single-Family Residential</td>
<td>1924</td>
</tr>
<tr>
<td>2</td>
<td>1959700510</td>
<td>670294</td>
<td>2608 10th Ave E</td>
<td>Single-Family Residential</td>
<td>1909</td>
</tr>
<tr>
<td>3</td>
<td>1959700615</td>
<td>348188</td>
<td>2610 11th Ave E</td>
<td>Single-Family Residential</td>
<td>1922</td>
</tr>
<tr>
<td>4</td>
<td>1912100305</td>
<td>657289</td>
<td>2419 11th Ave E</td>
<td>Single-Family Residential</td>
<td>1905</td>
</tr>
<tr>
<td>5</td>
<td>1912100325</td>
<td>401299</td>
<td>2413 11th Ave E</td>
<td>Single-Family Residential</td>
<td>1947</td>
</tr>
<tr>
<td>6</td>
<td>1912100335</td>
<td>452033</td>
<td>2407 11th Ave E</td>
<td>Single-Family Residential</td>
<td>1924</td>
</tr>
<tr>
<td>7</td>
<td>2025049007</td>
<td>713777</td>
<td>Seattle Preparatory School Campus, 2400 11th Ave E</td>
<td>School</td>
<td>1905, demolished 2015</td>
</tr>
<tr>
<td></td>
<td></td>
<td>722578</td>
<td>Adelphia Hall</td>
<td></td>
<td>1929, 1952, 1983</td>
</tr>
<tr>
<td></td>
<td></td>
<td>722580</td>
<td>McDonnell Hall (Christy L. Addition, Garrigan Gymnasium)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NA</td>
<td></td>
<td>NA</td>
<td>Adelphia Memorial Hall (Payton Hall)</td>
<td></td>
<td>1968, 2014</td>
</tr>
<tr>
<td>NA</td>
<td></td>
<td>NA</td>
<td>McHugh Gym</td>
<td></td>
<td>1983</td>
</tr>
<tr>
<td></td>
<td></td>
<td>NA</td>
<td>St. Ignatius Hall</td>
<td></td>
<td>1999</td>
</tr>
</tbody>
</table>

HPI = Historic Property Inventory; NA = not applicable
### Table 5. Summary of Previously Evaluated NRHP Eligible Properties Surveyed for Documentation Updates

<table>
<thead>
<tr>
<th>Map ID</th>
<th>Assessor Parcel Number</th>
<th>HPI Property ID</th>
<th>Property Name, Address</th>
<th>Property Type</th>
<th>Year Built</th>
<th>Current NRHP Eligibility Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>1959700005</td>
<td>96540</td>
<td>Seward Public School Complex, 2515 Boylston Ave E</td>
<td>School</td>
<td>1893, 1905, 1917</td>
<td>Individually Eligible</td>
</tr>
<tr>
<td>B</td>
<td>5535100285</td>
<td>720049</td>
<td>Freeway Control Office Building, 811 E Roanoke St</td>
<td>Single-Family Residential</td>
<td>1964</td>
<td>Not Individually Eligible; Not Contributor&lt;sup&gt;1&lt;/sup&gt;</td>
</tr>
<tr>
<td>C</td>
<td>5535100340</td>
<td>96595</td>
<td>2408 Broadway E</td>
<td>Single-Family Residential</td>
<td>1910</td>
<td>Individually Eligible</td>
</tr>
<tr>
<td>D</td>
<td>2162800000</td>
<td>96606</td>
<td>904 E Miller St</td>
<td>Single-Family Residential</td>
<td>1911</td>
<td>Individually Eligible</td>
</tr>
<tr>
<td>E</td>
<td>5535100350</td>
<td>96623</td>
<td>910 E Miller St</td>
<td>Single-Family Residential</td>
<td>1905</td>
<td>Individually Eligible</td>
</tr>
<tr>
<td>F</td>
<td>1912101205</td>
<td>96624</td>
<td>914 E Miller St</td>
<td>Single-Family Residential</td>
<td>1905</td>
<td>Individually Eligible</td>
</tr>
<tr>
<td>G</td>
<td>1959700460</td>
<td>96500</td>
<td>Roanoke Park, 950 E Roanoke St</td>
<td>Public Park</td>
<td>1908</td>
<td>Not Individually Eligible; Contributor to Roanoke Park Historic District</td>
</tr>
<tr>
<td>H</td>
<td>1959700515</td>
<td>48538</td>
<td>1004 E Roanoke St</td>
<td>Single-Family Residential</td>
<td>1907</td>
<td>Individually Eligible; Contributor to Roanoke Park Historic District</td>
</tr>
<tr>
<td>I</td>
<td>1959700520</td>
<td>48539</td>
<td>1018 E Roanoke St</td>
<td>Single-Family Residential</td>
<td>1909</td>
<td>Individually Eligible; contributor to Montlake Historic District</td>
</tr>
<tr>
<td>J</td>
<td>6788202280</td>
<td>42935</td>
<td>Montlake Field House</td>
<td>Field House</td>
<td>1935</td>
<td>Not Individually Eligible; Contributor</td>
</tr>
</tbody>
</table>

<sup>1</sup> This property was previously evaluated under HPI ID 44344. That record documented both the building at 811 East Roanoke Street and 901 East Roanoke Street. The latter was determined to be NRHP-eligible but was demolished. This property was determined not eligible. The record that was created for 811 East Roanoke Street in 2019 (HPI ID 720049) was updated to reflect the findings in HPI ID 44344 and 2020 field survey photos.
NRHP Eligibility Evaluation Summary

The 20 surveyed properties were evaluated to determine their eligibility for listing in the NRHP, and were recorded in the Washington State Historic Property Inventory form database, per DAHP reporting standards.

Of the properties that were not previously evaluated for individual eligibility, ICF recommends one property (2612 10th Avenue East) is individually eligible for listing in the NRHP and is a contributor to the Roanoke Park Historic District. ICF also recommends one property is not eligible for individual listing in the NRHP, but is a contributor to the Roanoke Park Historic District. ICF recommends five properties are not eligible for listing in the NRHP. One of these properties, the Seattle Preparatory School Campus, included two buildings that were evaluated. Separate HPI forms were prepared in compliance with DAHP documentation standards.

A summary of historic built property NRHP eligibility recommendations is provided in Table 6. Complete eligibility evaluations for the properties are available in the Historic Property Inventory Forms included in Appendix D, New Historic Property Inventory Forms. Evaluations include historic context, significance assessment, property description with integrity analysis, and eligibility recommendations under NRHP Criteria A, B, C, and D.

Of the 13 properties reviewed for preparation of updated documentation, ICF recommends 2 properties for a change in eligibility status: The residence at 914 East Miller Street is not individually eligible based on loss of integrity. Montlake Playfield, which was determined eligible as a contributing feature of the Montlake Historic District, was not evaluated for...
individual eligibility in 2009 or 2015. Based on analysis conducted for this study, ICF recommends that it retain its status as district contributor, but it is not individually eligible for listing in the NRHP given it is not independently significant beyond its role as a landscape feature associated with the Montlake Field House and its integrity has been altered since it was built in 1935.

A summary of historic built property NRHP eligibility recommendations is provided in Table 7. Updated eligibility evaluations for the properties are available in the Historic Property Inventory Forms included in Appendix E, Update Historic Property Inventory Forms. These include summary of previous eligibility findings, updated integrity analysis, updated eligibly recommendation, and updated existing conditions.

Table 6. Historic Built Property Eligibility Recommendations for Previously Unevaluated Properties

<table>
<thead>
<tr>
<th>Map ID</th>
<th>HPI Property ID</th>
<th>Property Name, Address</th>
<th>Eligibility Status</th>
<th>NRHP Criteria</th>
<th>Significance</th>
<th>Period of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>670293</td>
<td>2612 10th Ave E</td>
<td>Recommended Individually Eligible; Contributor to Roanoke Park Historic District</td>
<td>C</td>
<td>Individually significant as an example that embodies Colonial Revival style architecture; Contributor to Roanoke Park Historic District as example of early 20th century residential architecture</td>
<td>1924</td>
</tr>
<tr>
<td>2</td>
<td>670294</td>
<td>2608 10th Ave E</td>
<td>Recommended Not Individually Eligible; Contributor to Roanoke Park Historic District</td>
<td>C</td>
<td>Contributor to Roanoke Park Historic District as example of early 20th century residential architecture</td>
<td>1909</td>
</tr>
<tr>
<td>3</td>
<td>348188</td>
<td>2610 11th Ave E</td>
<td>Recommended Not Individually Eligible; Recommended Not Eligible as a district contributor to the Roanoke Park Historic District or any other potential district</td>
<td>NA</td>
<td>NA</td>
<td>1922</td>
</tr>
<tr>
<td>4</td>
<td>657289</td>
<td>2419 11th Ave E</td>
<td>Recommended Not Individually Eligible; Recommended Not Eligible as a district contributor to the</td>
<td>NA</td>
<td>NA</td>
<td>1905</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>401299</td>
<td>2413 11th Ave E</td>
<td>Recommended Not Individually Eligible; Recommended Not Eligible as a district contributor to the Roanoke Park Historic District or any other potential district</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>NA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>452033</td>
<td>2407 11th Ave E</td>
<td>Recommended Not Individually Eligible; Recommended Not Eligible as a district contributor to the Roanoke Park Historic District or any other potential district</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>NA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>722578</td>
<td>Seattle Preparatory School Campus, 2400 11th Ave E</td>
<td>Recommended Not Individually Eligible; Recommended Not Eligible as a district contributor to the Roanoke Park Historic District or any other potential district</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>McDonnell Hall (Garrigan Gymnasium, Christy L. Addition)</td>
<td>NA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>722580</td>
<td>Adelphia Memorial Hall (Payton Hall)</td>
<td>Recommended Not Individually Eligible; Recommended Not Eligible as a district contributor to the Roanoke Park Historic District or any other potential district</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>NA</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

HPI = Historic Property Inventory; NRHP = National Register of Historic Places; NA = not applicable
### Table 7. Historic Built Property Eligibility Update Recommendations for Previously Evaluated Properties

<table>
<thead>
<tr>
<th>Map ID</th>
<th>HPI Property ID</th>
<th>Property Name, Address</th>
<th>Current NRHP Eligibility Status</th>
<th>Update NRHP Eligibility Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>96540</td>
<td>Seward Public School Complex, 2515 Boylston Ave E</td>
<td>Individually Eligible</td>
<td>No change: Individually Eligible</td>
</tr>
<tr>
<td>B</td>
<td>720049</td>
<td>Freeway Control Office Building, 811 E Roanoke St</td>
<td>Not Individually Eligible; Not Contributor</td>
<td>No change: Not Individually Eligible; Not Contributor</td>
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<td>C</td>
<td>96595</td>
<td>2408 Broadway E</td>
<td>Individually Eligible</td>
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<td>D</td>
<td>96606</td>
<td>904 E Miller St</td>
<td>Individually Eligible</td>
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<td>E</td>
<td>96623</td>
<td>910 E Miller St</td>
<td>Individually Eligible</td>
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<td>F</td>
<td>96624</td>
<td>914 E Miller St</td>
<td>Individually Eligible</td>
<td>Updated Recommendation: Not Individually Eligible based on loss of integrity</td>
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<td>G</td>
<td>96500</td>
<td>Roanoke Park, 950 E Roanoke St</td>
<td>Not Individually Eligible; Contributor to Roanoke Park Historic District</td>
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<tr>
<td>H</td>
<td>48538</td>
<td>1004 E Roanoke St</td>
<td>Individually Eligible; Contributor to Roanoke Park Historic District</td>
<td>No change: Individually Eligible; Contributor to Roanoke Park Historic District</td>
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<tr>
<td>I</td>
<td>48539</td>
<td>1018 E Roanoke St</td>
<td>Individually Eligible; Contributor to Montlake Historic District</td>
<td>No change: Individually Eligible; Contributor to Montlake Historic District</td>
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<tr>
<td>J</td>
<td>42935</td>
<td>Montlake Field House</td>
<td>Individually Eligible; Contributor to Montlake Historic District</td>
<td>No change: Individually Eligible; Contributor to Montlake Historic District</td>
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<td></td>
<td>719887</td>
<td>Montlake Playfield</td>
<td>Unevaluated for Individual Eligibility; Contributor to Montlake Historic District</td>
<td>Updated Recommendation: Not Individually Eligible; Contributor to Montlake Historic District</td>
</tr>
<tr>
<td>K</td>
<td>96683</td>
<td>2575 W Montlake Pl E</td>
<td>Not Individually Eligible; Contributor to Montlake Historic District</td>
<td>No change: Not Individually Eligible; Contributor to Montlake Historic District</td>
</tr>
</tbody>
</table>
Effects Analysis Individually Eligible Properties

Potential effects from proposed project changes are analyzed below for properties identified as individually NRHP-eligible, eligible as contributors to NRHP-eligible historic districts, and NRHP-eligible historic districts in the expanded LOC and expanded APE.

Roanoke Lid and I-5 Connection

Seward Public School Complex, 2515 Boylston Avenue East

The Seward Public School Complex at 2515 Boylston Avenue East contains three historic buildings: (1) a one-story school building built in 1893 that features a brick foundation, a hipped roof, asphalt shingle roofing, wood clapboard siding, balloon frame construction, and a rectangular plan; (2) a 2.5-story school building built in 1905 that features a poured-concrete foundation, a hipped roof, asphalt shingle roofing, a combination of wood clapboard and stucco cladding, balloon frame construction, and a rectangular plan; and (3) a two-story school building built in 1917 that features a poured concrete foundation, a hipped roof, asphalt shingle roofing, brick masonry construction, and a T-shaped plan. All three buildings are designated Seattle landmarks. The property also contains a gymnasium in the northeast corner of the parcel at the intersection of Boylston Avenue East and East Roanoke Street (west of I-5), which was built in 1999.

In the vicinity of this property, the proposed project changes would include extended subsurface easements to accommodate retaining wall anchor tiebacks. While the extended subsurface easement would extend from retaining walls in the SR 520 right of way (approximately 70 feet east of the property), the subsurface tiebacks extending into the property boundary would be deep below ground, well beneath the 1999 gymnasium, and would not be beneath any of the historic buildings that contribute to the property's NRHP eligibility. As such, the proposed project changes would not directly alter the property's integrity of location, setting, design, workmanship, materials, feeling, or association.

No new vibration, noise, fugitive dust, or traffic effects from construction of the proposed project changes are expected to alter characteristics that qualify the property for inclusion in the NRHP. A vibration level of 0.20 inches per second peak particle velocity is associated with potential for building damage to non-engineered timber or masonry structures. Given the depth of installation, the equipment associated with installation of the subsurface tiebacks would not exceed this building...
damage threshold (FTA 2006). This type of equipment does not typically produce noise or fugitive dust substantial enough to affect the three historic buildings located on the parcel.

In addition, WSDOT would implement commitments stipulated by the Programmatic Agreement (PA) as published in the Record of Decision and amended, including VII.E.1, which stipulates WSDOT will comply with the local noise regulations for construction and equipment operation; VII.G.1–6, which address monitoring and management of vibration; and VIII.C, which stipulates, "through standard [best management practices] and WSDOT standard specifications and special provisions, WSDOT will take general precautions to protect historic properties from excessive noise, vibration, excavation, emissions, fugitive dust, lighting, glare, and traffic impacts..." (Federal Highway Administration and Washington State Department of Transportation 2011b). In addition, the proposed project changes would not prohibitively alter access or use of the property. Thus, it would have a no negative indirect impact on economic or operational viability. Because the proposed project changes would not directly or indirectly alter characteristics that qualify the property for inclusion in the NRHP, the integrity of the resource would not be diminished. As such, the project would have no new adverse effect on the Seward Public School Complex at 2515 Boylston Avenue East.

**2408 Broadway East**

The NRHP-eligible property at 2408 Broadway East is a 2.5-story Prairie-style residence built in 1910. It features a hipped roof, a mix of wood shingle and wood clapboard cladding, balloon frame construction, a concrete foundation, and a generally rectangular plan.

In the vicinity of this property, the proposed project changes would include extended subsurface easements to accommodate retaining wall anchor tiebacks. While the extended subsurface easement would extend from retaining walls in the SR 520 right of way (approximately 140 feet north of the property), the subsurface tiebacks extending into the property boundary would be deep below ground and would be well beneath the residence. As such, the proposed project changes would not directly alter the property’s integrity of location, setting, design, workmanship, materials, feeling, or association.

No new vibration, noise, fugitive dust, or traffic effects from construction of the proposed project changes are expected to alter characteristics that qualify the property for inclusion in the NRHP. A vibration level of 0.20 inches per second peak particle velocity is associated with potential for building damage to non-engineered timber or masonry structures. Given the depth of installation, the equipment associated with installation of the subsurface tiebacks would not exceed this building damage threshold (FTA 2006). This type of equipment does not typically produce noise or fugitive dust substantial enough to affect the residence.

In addition, WSDOT would implement commitments stipulated by the PA as published in the Record of Decision and amended, including VII.E.1, which stipulates WSDOT will comply with the local noise regulations for construction and equipment operation, VII.G.1–6, which address monitoring and management of vibration, and VIII.C, which stipulates, “through standard [best management practices] and WSDOT standard specifications and special provisions, WSDOT will take general precautions to protect historic properties from excessive noise, vibration, excavation, emissions,
fugitive dust, lighting, glare, and traffic impacts…” (Federal Highway Administration and Washington State Department of Transportation 2011b). In addition, the proposed project changes would not prohibitively alter access or use of the property. Thus, it would have a no negative indirect impact on economic or operational viability. Because the proposed project changes would not directly or indirectly alter characteristics that qualify the property for inclusion in the NRHP, the integrity of the resource would not be diminished. As such, the project would have no new adverse effect on the residence at 2408 Broadway East.

**910 East Miller Street**

The NRHP-eligible property at 910 East Miller Street is a 1.5-story Arts and Crafts/Craftsman-style residence built in 1905. It features a hipped roof, asphalt shingle roofing, wood clapboard cladding, balloon frame construction, poured concrete foundation, and a rectangular plan.

In the vicinity of this property, the proposed project changes would include extended subsurface easements to accommodate retaining wall anchor tiebacks. While the extended subsurface easement would extend from retaining walls in the SR 520 right of way (approximately 220 feet north of the property), the subsurface tiebacks extending into the property boundary would be deep below ground, well beneath the residence. As such, the proposed project changes would not directly alter the property’s integrity of location, setting, design, workmanship, materials, feeling, or association.

No new vibration, noise, fugitive dust, or traffic effects from construction of the proposed project changes are expected to alter characteristics that qualify the property for inclusion in the NRHP. A vibration level of 0.20 inches per second peak particle velocity is associated with potential for building damage to non-engineered timber or masonry structures. Given the depth of installation, the equipment associated with installation of the subsurface tiebacks would not exceed this building damage threshold (FTA 2006). This type of equipment does not typically produce noise or fugitive dust substantial enough to affect the residence.

In addition, WSDOT would implement commitments stipulated by the PA as published in the Record of Decision and amended, including VII.E.1, which stipulates WSDOT will comply with the local noise regulations for construction and equipment operation; VII.G.1–6, which address monitoring and management of vibration; and VIII.C, which stipulates, “through standard [best management practices] and WSDOT standard specifications and special provisions, WSDOT will take general precautions to protect historic properties from excessive noise, vibration, excavation, emissions, fugitive dust, lighting, glare, and traffic impacts…” (Federal Highway Administration and Washington State Department of Transportation 2011b). In addition, the proposed project changes would not prohibitively alter access or use of the property. Thus, it would have a no negative indirect impact on economic or operational viability. Because the proposed project changes would not directly or indirectly alter characteristics that qualify the property for inclusion in the NRHP, the integrity of the resource would not be diminished. As such, the project would have no new adverse effect on the residence at 910 East Miller Street.
904 East Miller Street

The NRHP-eligible property at 904 East Miller Street is a 2.5-story Prairie-style residence built in 1911. It features a hipped roof with asphalt/composite roof materials, brick cladding, balloon frame construction, a poured concrete foundation, and a rectangular plan. The property appears to be in good condition.

In the vicinity of this property, the proposed project changes would include extended subsurface easements to accommodate retaining wall anchor tiebacks. While the extended subsurface easement would extend from retaining walls in the SR 520 right of way (approximately 170 feet north of the property), the subsurface tiebacks extending into the property boundary would be deep below ground, well beneath the residence. As such, the proposed project changes would not directly alter the property's integrity of location, setting, design, workmanship, materials, feeling, or association.

No new vibration, noise, fugitive dust, or traffic effects from construction of the proposed project changes are expected to alter characteristics that qualify the property for inclusion in the NRHP. A vibration level of 0.20 inches per second peak particle velocity is associated with potential for building damage to non-engineered timber or masonry structures. Given the depth of installation, the equipment associated with installation of the subsurface tiebacks would not exceed this building damage threshold (FTA 2006). This type of equipment does not typically produce noise or fugitive dust substantial enough to affect the residence.

In addition, WSDOT would implement commitments stipulated by the PA as published in the Record of Decision and amended, including VII.E.1, which stipulates WSDOT will comply with the local noise regulations for construction and equipment operation; VII.G.1–6, which address monitoring and management of vibration; and VIII.C, which stipulates, “through standard [best management practices] and WSDOT standard specifications and special provisions, WSDOT will take general precautions to protect historic properties from excessive noise, vibration, excavation, emissions, fugitive dust, lighting, glare, and traffic impacts...” (Federal Highway Administration and Washington State Department of Transportation 2011b). In addition, the proposed project changes would not prohibitively alter access or use of the property. Thus, it would have a no negative indirect impact on economic or operational viability. Because the proposed project changes would not directly or indirectly alter characteristics that qualify the property for inclusion in the NRHP, the integrity of the resource would not be diminished. As such, the project would have no new adverse effect on the residence at 904 East Miller Street.

11th Avenue North of SR 520

Roanoke Park, 950 East Roanoke Street

Roanoke Park, located at 950 East Roanoke Street, was built in 1910. The rectangular green space was originally designed as a passive park, with a lawn, trees, some shrub plantings, benches, a small play area, and pedestrian walkways, but no significant buildings. While it is a contributing element to the NRHP-listed Roanoke Park Historic District, it is not individually eligible. Between 2004 and 2009, resident volunteers worked with the Seattle Parks Department to improve the playground at the north end of the park, add a basketball court, and reconfigure paths and planting beds for better
pedestrian circulation. Residents and other volunteer groups planted approximately 100 trees, and thousands of shrubs and perennials in the park.

In the vicinity of this property, the expanded LOC may include relocation of a water line to the southeast corner of Roanoke Park. The portion of the water line that is under SR 520 would have to be relocated to accommodate the Roanoke Lid. The connection point to the existing water line may have to be made within the boundary of Roanoke Park where there is an existing underground water line bend. The connection would require excavation of an area approximately 20-feet by 20-feet in the southeast corner of the park. An isolation valve would be installed within a concrete vault with an access hatch extending to the ground surface. The utility vault lid would be flush to the ground. With the exception of the vault lid area, the landscape features disturbed by the vault installation would be fully restored. While this would result in permanent change to the park’s integrity of setting at the location of the vault lid, change associated with excavation would be temporary. Moreover, plantings in the southeast corner of park are not original, and are more densely planted than the original landscape design. Furthermore, the addition of the vault cover would result in a minor impact on integrity of design and feeling, given the small area of change for this contributing property relative to the district as a whole.

In addition, the proposed project changes would include extended subsurface easements to accommodate retaining wall anchor tiebacks. While the extended subsurface easement would extend from retaining walls in the SR 520 right of way (approximately 160 feet south of the property), the subsurface tiebacks extending into the property boundary would be deep below ground, well beneath the park. As such, the proposed subsurface tiebacks would not directly alter the property’s integrity of location, setting, design, workmanship, materials, feeling, or association.

No new vibration, noise, fugitive dust, or traffic effects from construction of the proposed project changes are expected to alter characteristics that qualify the property for inclusion in the NRHP. A vibration level of 0.20 inches per second peak particle velocity is associated with potential for building damage to non-engineered timber or masonry structures. Given the depth of installation, the equipment associated with installation of the subsurface tiebacks would not exceed this building damage threshold (FTA 2006). This type of equipment does not typically produce noise or fugitive dust substantial enough to affect the features that qualify the park as a contributor to the Roanoke Park Historic District or affect the district as a whole.

WSDOT would implement commitments stipulated by the PA as published in the Record of Decision and amended, including VII.E.1, which stipulates WSDOT will comply with the local noise regulations for construction and equipment operation; VII.G.1–6, which address monitoring and management of vibration; and VIII.C, which stipulates, “through standard [best management practices] and WSDOT standard specifications and special provisions, WSDOT will take general precautions to protect historic properties from excessive noise, vibration, excavation, emissions, fugitive dust, lighting, glare, and traffic impacts...” (Federal Highway Administration and Washington State Department of Transportation 2011b). In addition, the proposed project changes would not prohibitively alter access or use of the property. Thus, it would have a no negative indirect impact on the viability of its continued historic use as a recreational space.
Given the proposed project changes would not substantially alter characteristics that qualify the property to be a contributing element to the NRHP-listed Roanoke Park Historic District, the overall integrity of the resource would not be diminished. As such, the project changes would have no new adverse effect on the NRHP-listed Roanoke Park Historic District.

2612 10th Avenue East

The property at 2612 10th Avenue East is a 1.5-story Colonial revival residence built in 1924. It features a side-gabled roof, asphalt shingle roofing, stucco cladding, balloon-frame construction, a concrete foundation, and a rectangular plan. It is individually eligible for listing in the NRHP and a contributor to the NRHP-listed Roanoke Park Historic District.

In the vicinity of this property, the proposed project changes would include extended subsurface easements to accommodate retaining wall anchor tiebacks. While the extended subsurface easement would extend from retaining walls in the SR 520 right of way (approximately 270 feet south of the property), the subsurface tiebacks extending into the property boundary would be deep below ground, well below the residence. As such, the proposed project changes would not directly alter the property's integrity of location, setting, design, workmanship, materials, feeling, or association.

No new vibration, noise, fugitive dust, or traffic effects from construction of the proposed project changes are expected to alter characteristics that qualify the property for inclusion in the NRHP. A vibration level of 0.20 inches per second peak particle velocity is associated with potential for building damage to non-engineered timber or masonry structures. Given the depth of installation, the equipment associated with installation of the subsurface tiebacks would not exceed this building damage threshold (FTA 2006). This type of equipment does not typically produce noise or fugitive dust substantial enough to affect the residence.

In addition, WSDOT would implement commitments stipulated by the PA as published in the Record of Decision and amended, including VII.E.1, which stipulates WSDOT will comply with the local noise regulations for construction and equipment operation; VII.G.1–6, which address monitoring and management of vibration; and VIII.C, which stipulates, “through standard [best management practices] and WSDOT standard specifications and special provisions, WSDOT will take general precautions to protect historic properties from excessive noise, vibration, excavation, emissions, fugitive dust, lighting, glare, and traffic impacts...” (Federal Highway Administration and Washington State Department of Transportation 2011b). In addition, the proposed project changes would not prohibitively alter access or use of the property. Thus, it would have a no negative indirect impact on economic or operational viability. Because the proposed project changes would not directly or indirectly alter characteristics that qualify the property for inclusion in the NRHP, the integrity of the resource would not be diminished. As such, the project would have no adverse effect on the residence as an individually eligible resource and would have no new adverse effect on the NRHP-listed Roanoke Park Historic District.

2608 10th Avenue East

The property at 2608 10th Avenue East is a three-story residence built in 1909. It is a modest example of Shingle-style and features a gabled roof, asphalt shingle roofing, shingle cladding, balloon
frame construction, a concrete foundation, and a rectangular plan. While it is not recommended individually eligible for listing in the NRHP, it is a contributing element of the Roanoke the NRHP-listed Roanoke Park Historic District.

In the vicinity of this property, the proposed project changes would include extended subsurface easements to accommodate retaining wall anchor tiebacks. While the extended subsurface easement would extend from retaining walls in the SR 520 right of way (approximately 230 feet south of the property), the subsurface tiebacks extending into the property boundary would be deep below ground, well below the residence. As such, the proposed project changes would not directly alter the property's integrity of location, setting, design, workmanship, materials, feeling, or association.

No new vibration, noise, fugitive dust, or traffic effects from construction of the proposed project changes are expected to alter characteristics that qualify the property for inclusion in the NRHP. A vibration level of 0.20 inches per second peak particle velocity is associated with potential for building damage to non-engineered timber or masonry structures. Given the depth of installation, the equipment associated with installation of the subsurface tiebacks would not exceed this building damage threshold (FTA 2006). This type of equipment does not typically produce noise or fugitive dust substantial enough to affect the residence.

In addition, WSDOT would implement commitments stipulated by the PA as published in the Record of Decision and amended, including VII.E.1, which stipulates WSDOT will comply with the local noise regulations for construction and equipment operation; VII.G.1–6, which address monitoring and management of vibration; and VIII.C, which stipulates, “through standard [best management practices] and WSDOT standard specifications and special provisions, WSDOT will take general precautions to protect historic properties from excessive noise, vibration, excavation, emissions, fugitive dust, lighting, glare, and traffic impacts...” (Federal Highway Administration and Washington State Department of Transportation 2011b). In addition, the proposed project changes would not prohibitively alter access or use of the property. Thus, it would have a no negative indirect impact on economic or operational viability. Because the proposed project changes would not substantially alter characteristics that qualify the property to be a contributing element to the NRHP-listed Roanoke Park Historic District, the overall integrity of the resource would not be diminished. As such, the project would have no new adverse effect on Roanoke the NRHP-listed Roanoke Park Historic District.

1004 East Roanoke Street

The property at 1004 East Roanoke Street is a 2.5-story Craftsman-style residence built in 1907. It features a hipped roof with asphalt/composite roof materials, wood shingle cladding, balloon frame construction, a brick foundation, and a generally rectangular plan. It is individually eligible for listing in the NRHP and a contributor to the NRHP-listed Roanoke Park Historic District.

In the vicinity of this property, the proposed project changes would include extended subsurface easements to accommodate retaining wall anchor tiebacks. While the extended subsurface easement would extend from retaining walls in the SR 520 right of way (approximately 170 feet south of the property), the subsurface tiebacks extending into the property boundary would be deep below
ground, well beneath the residence. As such, the proposed project changes would not directly alter the property's integrity of location, setting, design, workmanship, materials, feeling, or association.

No new vibration, noise, fugitive dust, or traffic effects from construction of the proposed project changes are expected to alter characteristics that qualify the property for inclusion in the NRHP. A vibration level of 0.20 inches per second peak particle velocity is associated with potential for building damage to non-engineered timber or masonry structures. Given the depth of installation, the equipment associated with installation of the subsurface tiebacks would not exceed this building damage threshold (FTA 2006). This type of equipment does not typically produce noise or fugitive dust substantial enough to affect the residence.

In addition, WSDOT would implement commitments stipulated by the PA as published in the Record of Decision and amended, including VII.E.1, which stipulates WSDOT will comply with the local noise regulations for construction and equipment operation; VII.G.1–6, which address monitoring and management of vibration; and VIII.C, which stipulates, “through standard [best management practices] and WSDOT standard specifications and special provisions, WSDOT will take general precautions to protect historic properties from excessive noise, vibration, excavation, emissions, fugitive dust, lighting, glare, and traffic impacts...” (Federal Highway Administration and Washington State Department of Transportation 2011b). In addition, the proposed project changes would not prohibitively alter access or use of the property. Thus, it would have a no negative indirect impact on economic or operational viability. Because the proposed project changes would not directly or indirectly alter characteristics that qualify the property for inclusion in the NRHP, the integrity of the resource would not be diminished. As such, the project would have no adverse effect on the residence as an individually eligible resource and would have no new adverse effect on Roanoke the NRHP-listed Roanoke Park Historic District.

1018 East Roanoke Street

The property at 1018 East Roanoke Street is a 2.5-story Prairie-style residence built in 1909. It features a pyramidal roof, asphalt shingle roofing, stucco cladding, balloon frame construction, a concrete foundation, and an irregular plan. It is individually eligible for listing in the NRHP and a contributor to the NRHP-listed Roanoke Park Historic District.

In the vicinity of this property, the proposed project changes would include extended subsurface easements to accommodate retaining wall anchor tiebacks. While the extended subsurface easement would extend from retaining walls in the SR 520 right of way (approximately 195 feet south of the property), the subsurface tiebacks extending into the property boundary would be deep below ground, well beneath the residence. As such, the proposed project changes would not directly alter the property's integrity of location, setting, design, workmanship, materials, feeling, or association.

No new vibration, noise, fugitive dust, or traffic effects from construction of the proposed project changes are expected to alter characteristics that qualify the property for inclusion in the NRHP. A vibration level of 0.20 inches per second peak particle velocity is associated with potential for building damage to non-engineered timber or masonry structures. Given the depth of installation, the equipment associated with installation of the subsurface tiebacks would not exceed this building
damage threshold (FTA 2006). This type of equipment does not typically produce noise or fugitive dust substantial enough to affect the residence.

In addition, WSDOT would implement commitments stipulated by the PA as published in the Record of Decision and amended, including VII.E.1, which stipulates WSDOT will comply with the local noise regulations for construction and equipment operation; VII.G.1–6, which address monitoring and management of vibration; and VIII.C, which stipulates, “through standard [best management practices] and WSDOT standard specifications and special provisions, WSDOT will take general precautions to protect historic properties from excessive noise, vibration, excavation, emissions, fugitive dust, lighting, glare, and traffic impacts...” (Federal Highway Administration and Washington State Department of Transportation 2011b). In addition, the proposed project changes would not prohibitively alter access or use of the property. Thus, it would have a no negative indirect impact on economic or operational viability. Because the proposed project changes would not directly or indirectly alter characteristics that qualify the property for inclusion in the NRHP, the integrity of the resource would not be diminished. As such, the project would have no adverse effect on the residence as an individually eligible resource and would have no new adverse effect on Roanoke the NRHP-listed Roanoke Park Historic District.

11th Avenue South of SR 520

No properties in the expanded LOC and expanded APE are recommended or determined eligible for listing in the NRHP. As such, proposed project activities in this area (Regional Shared Use Path connections to Delmar Drive East; pedestrian crosswalk and sidewalk amenities in the vicinity of Delmar Drive East and Interlaken Boulevard and 10th Avenue East; ADA improvements at East Roanoke Street and Boyer Avenue East; intersection improvements at 11th Avenue East and Elmar Drive East) would have no new adverse effect on historic properties.

Portage Bay Bridge Over-Water Span

No properties in the expanded LOC and expanded APE in the vicinity of the Portage Bay Bridge Over-Water Span activities are recommended or determined eligible for listing in the NRHP. As such, proposed project activities in this location would have no new adverse effect on historic properties.

Montlake Playfield Path

Montlake Field House, 1618 East Calhoun Street

The Montlake Field House at 1618 East Calhoun Street is a 1.5-story Tudor Revival field house built in 1935. It features a gabled jerkinhead roof, asphalt shingle roofing, brick and stucco cladding, balloon frame construction, and a cruciform plan. It is individually eligible for listing in the NRHP and a contributor to the NRHP-listed Montlake Historic District.

In the vicinity of this property, the proposed project changes would include construction of pedestrian/bike connections from where the SR 520 Trail crosses Portage Bay and its connection to the Bill Dawson Trail at the edge of Montlake Playfield. The regional shared-use path would be approximately 14-feet wide. In addition, the connection, which would be located in the northeast
corner of the parcel, would permanently occupy the airspace in that portion of the playfield, as well as contain a number of on-land piers.

While the proposed project changes would introduce a bicycle and pedestrian connection within the boundaries of the parcel, the location of the changes would be approximately 722 feet northeast of the rear façade of the field house building. Moreover, the change would occur in a location of the playfield that was not included in the site’s original 1935 design and was reconfigured after the period of significance for the field house and for the Montlake Historic District (1904–1959). As such, the proposed project changes would not represent a substantial impact on the building’s integrity of location, setting, design, materials, workmanship, feeling, and association. Nor would they substantially alter characteristics that qualify Montlake Historic District for listing in the NRHP. As such, the project would have no adverse effect on the residence as an individually eligible resource and would have no new adverse effect on the NRHP-listed Montlake Historic District.

**Montlake Playfield, 1618 East Calhoun Street**

The Montlake Playfield at 1618 East Calhoun Street is a large open space recreational area facing onto Portage Bay. When it was originally built in 1935, it was a companion amenity to the Montlake Field House constructed on partially filled former marshlands by Works Progress Administration workers. The property was altered during the 1960s–1970s, when more of the northern shoreline was filled by dredge from construction of the Evergreen Point Floating Bridge and the baseball field’s orientation was reconfigured to accommodate for football and track. While it is not recommended individually eligible for listing in the NRHP, it is a contributor to the NRHP-listed Montlake Historic District.

The proposed project changes would include construction of pedestrian/bike connections from where the SR 520 Trail crosses Portage Bay and its connection to the Bill Dawson Trail at the northeast corner of the Montlake Playfield. The regional shared-use path would be approximately 14-feet wide. In addition, the connection would permanently occupy the airspace in that portion of the playfield and include several on-land piers.

While the proposed project changes would introduce a bicycle and pedestrian connection within the boundaries of the parcel, the changes would occur in a part of the playfield that was not included in the site's original 1935 design and was reconfigured after the period of significance for the Montlake Historic District (1904–1959). As such, the proposed project changes would not represent a substantial impact on the playfield’s location, setting, design, materials, workmanship, feeling, and association. Because the proposed project changes would not substantially alter characteristics that qualify the property to be a contributing element to the NRHP-listed Montlake Historic District, the overall integrity of the district would not be diminished. As such, the project would have no new adverse effect on the Montlake Historic District.

**2575 West Montlake Place East**

The property at 2575 West Montlake Place East is a one-story Ranch-style residence built in 1951. It features a hipped roof, asphalt shingle roofing, brick cladding, platform frame construction, a poured
concrete foundation, and an irregular plan. While it is not individually eligible for listing in the NRHP, it is a contributor to the NRHP-listed Montlake Historic District.

In the vicinity of this property, the proposed project changes would include construction of pedestrian/bike connections from where the SR 520 Trail crosses Portage Bay and its connection to the Bill Dawson Trail at the edge of Montlake Playfield. The regional shared-use path would be approximately 14-feet wide. In addition, the connection, which would be in the northeast corner of the parcel, would permanently occupy the airspace in that portion of the playfield, as well as contain several on-land piers.

While the proposed project changes would introduce a bicycle and pedestrian connection in the northeast corner of the Montlake playfield, which is adjacent to the rear (west) boundary of this property, changes would not occur within the parcel boundaries of this property and would be screened by a buffer of trees at the rear of the property. In addition, the ground-level Bill Dawson Trail is already present on rear (west) boundary of the property. As such, the proposed project changes would not represent a substantial impact on the residence’s integrity of location, design, materials, workmanship, feeling, and association, and would represent only a minor impact on integrity of setting. Because the proposed project changes would not substantially alter characteristics that qualify the property to be a contributing element to the NRHP-listed Montlake Historic District, the overall integrity of the resource would not be diminished. As such, the project would have no new adverse effect on the Montlake Historic District.

2571 West Montlake Place East

The property at 2571 West Montlake Place East is a 1.5-story residence exhibiting a blend of architectural styles, built in 1938. It features one dwelling unit, a gabled roof, asphalt shingle roofing, brick and wood clapboard cladding, balloon frame construction, and an L-shaped plan. While it is not individually eligible for listing in the NRHP, it is a contributor to the NRHP-listed Montlake Historic District.

In the vicinity of this property, the proposed project changes would include construction of pedestrian/bike connections from where the SR 520 Trail crosses Portage Bay and its connection to the Bill Dawson Trail at the edge of Montlake Playfield. The regional shared-use path would be approximately 14-feet wide. In addition, the connection, which would be in the northeast corner of the parcel, would permanently occupy the airspace in that portion of the playfield, as well as contain several on-land piers.

While the proposed project changes would introduce a bicycle and pedestrian connection in the northeast corner of the Montlake playfield, which is adjacent to the rear (west) boundary of this property, changes would not occur within the parcel boundaries of this property and would be screened by a buffer of trees at the rear of the property. In addition, the ground-level Bill Dawson Trail is already present on rear (west) boundary of the property. As such, the proposed project changes would not represent a substantial impact on the residence’s integrity of location, design, materials, workmanship, feeling, and association, and would represent only a minor impact on integrity of setting. Because the proposed project changes would not substantially alter characteristics that qualify the property to be a contributing element to the NRHP-listed Montlake
Historic District, the overall integrity of the resource would not be diminished. As such, the project would have no new adverse effect on the Montlake Historic District.

2553 West Montlake Place East

The property at 2553 West Montlake Place East is a Tudor Revival–style residence built in 1936. It features a gabled roof, asphalt shingle roofing, brick cladding, balloon frame construction, a poured concrete foundation, and an L-shaped plan. While it is not individually eligible for listing in the NRHP, it is a contributor to the NRHP-listed Montlake Historic District.

In the vicinity of this property, the proposed project changes would include construction of pedestrian/bike connections from where the SR 520 Trail crosses Portage Bay and its connection to the Bill Dawson Trail at the edge of Montlake Playfield. The regional shared-use path would be approximately 14-feet wide. In addition, the connection, which would be in the northeast corner of the parcel, would permanently occupy the airspace in that portion of the playfield, as well as contain several on-land piers.

While the proposed project changes would introduce a bicycle and pedestrian connection within the northeast corner of the Montlake playfield, which is adjacent to the rear (west) boundary of this property, changes would not occur within the parcel boundaries of this property and would be screened by a buffer of trees at the rear of the property. In addition, the ground-level Bill Dawson Trail is already present on rear (west) boundary of the property. As such, the proposed project changes would not represent a substantial impact on the residence’s integrity of location, design, materials, workmanship, feeling, and association, and would represent only a minor impact on integrity of setting. Because the proposed project changes would not substantially alter characteristics that qualify the property to be a contributing element to the NRHP-listed Montlake Historic District, the overall integrity of the resource would not be diminished. As such, the project would have no new adverse effect on the Montlake Historic District.

Effects Analysis – Districts

Roanoke Park Historic District

The expanded LOC and expanded APE within the boundaries of the Roanoke Park Historic District consist of area for utilities work, including water line relocation in Roanoke Park, sidewalk work, and increased subsurface easement area for retaining wall tieback anchors beneath Roanoke Park, as well as retaining wall tieback anchors beneath 2612 10th Avenue East, 2608 10th Avenue East, 1004 East Roanoke Street, and 1018 East Roanoke Street (contributing properties analyzed in the section 11th Avenue North of SR 520 above). The only permanent surface disturbance within the boundaries of the historic district would be the vault cover associated with the water line relocation. Proposed project changes would not result in impacts on the Roanoke Park Historic District substantial enough to undermine the district’s integrity of location, design, setting, materials, workmanship, feeling, and association overall. As such, these changes do not represent new adverse effects on the Roanoke Park Historic District.
Montlake Historic District

The expanded LOC within the Montlake Historic District is limited to the construction of pedestrian/bike connections from where the SR 520 Trail crosses Portage Bay and its connection to the Bill Dawson Trail at the edge of Montlake Playfield in the northeast corner of the parcel, which is shared with the Montlake Field House, and adjacent to the rear (west boundaries) of contributing residential properties, 2575 West Montlake Place East, 2571 West Montlake Place East, and 2553 West Montlake Place East (analyzed in the section Montlake Playfield Path above). Proposed project changes would not result in impacts on the Montlake Historic District substantial enough to undermine the district's integrity of location, design, setting, materials, workmanship, feeling, and association overall. As such, these changes do not represent new adverse effects on the Montlake Historic District.

Conclusions

Archaeological Sensitivity Assessment Conclusion

Review of the project’s previous archaeological sensitivity study (Elder and Cascella 2013) and geologic maps (USGS 2020) reveal that the portions of the expanded LOC on the west side of Portage Bay and the Roanoke Lid are located in an area that was previously determined to have limited archaeological sensitivity based on the absence of buried Holocene-aged surfaces and sediments. The portions of the expanded LOC on the east side of Portage Bay are located in an area previously determined to have elevated archaeological sensitivity based on the presence of buried Holocene-aged surfaces and sediments.

Historic Built Environment Conclusion

Although 14 NRHP-eligible properties are in the expanded LOC and APE (4 individually eligible properties, 4 properties that are both individually eligible and contributing to an historic district, 6 properties that are contributors to historic districts), none of the proposed project changes would result in impacts on the properties such that they would be considered adverse effects. Moreover, while the expanded LOC and expanded APE are within the boundaries of two NRHP-listed historic districts, the project changes would not cause a new adverse effects or increase the severity of the project-related effects on the Roanoke Park Historic District or the Montlake Historic District that were previously determined.

Recommendations

Based on the analysis presented in this memorandum, the proposed project changes would not result in additional adverse effects on historic properties. None of the proposed project activities would substantially affect the integrity of any of the properties in the expanded LOC and APE that have been determined or are recommended eligible for listing in the NRHP; they would therefore
not be considered adverse. As such, a finding of “no adverse effect” is recommended for this undertaking. ICF recommends that there is no need to consult with DAHP or other affected parties to determine mitigation for impacts.

Based on the findings of the project’s pervious archaeological landform sensitivity assessment (Elder and Cascella 2013) and supplemental review of the National Geologic Map Database (2020), ICF recommends no additional archaeological studies or monitoring for ground disturbance in the expanded LOC on the west side of the Portage Bay Bridge and the Roanoke Lid. Using these same resources, ICF recommends that ground disturbance in the expanded LOC on the east side of Portage Bay Bridge be monitored by a professional archaeologist in instances where project-related ground-disturbing activities have the potential to extend deep enough to intersect with buried Holocene-aged terrestrial landforms and surfaces. ICF further recommends that archaeological monitoring be performed by professional archaeologists in accordance with the procedures outlined in the Archaeological Treatment Plan, revised in the landform sensitivity assessment, and developed in consultation with the Department of Archaeology and Historic Preservation, U.S. Army Corps of Engineers, King County Historic Preservation, and consulting tribes. Appendix F, Figure 3, Portage Bay and Roanoke Lid Phase Archaeologically Sensitive Areas illustrates the archaeologically sensitive area within the expanded APE, which should be referenced for future archaeological monitoring.

In the event of the discovery of archaeological deposits or human remains during project-related ground disturbance, it is recommended that the procedures and protocols outlined in the Unanticipated Discovery Plan included in Appendix C of the Archaeological Treatment Plan (Elder et al. 2011) be followed.

References


