

# Montlake Community Club

Working together to maintain and nurture the natural environment  
and history of Seattle's Montlake neighborhood

May 9, 2011

Randy Everett  
Major Projects Oversight Manager  
U.S. Department of Transportation  
Federal Highway Administration  
Suite 501 Evergreen Plaza  
711 South Capitol Way  
Olympia, WA 98501-1284

Re: Comments on May 2, 2011 Section 106 Programmatic Agreement,  
SR 520, I-5 to Medina

Dear Mr. Everett:

The Montlake Community Club has participated diligently in the Section 106 process, and we appreciate that several mitigation measures have been improved as a result of community input. There is no question, however, that historic resources in Montlake are vulnerable to substantial adverse effects from the SR 520 project. The Montlake community will participate in future implementation of the Programmatic Agreement ("PA") to monitor those measures that are included and to make sure that the Community Construction Management Plan ("CCMP") avoids, minimizes, and mitigates adverse effects on historic resources.

The 25th Whereas clause to the PA states that by signing the PA, the concurring party does not necessarily support the Project or the preferred alternative or endorse all stipulations of the PA. However, the 26th Whereas clause makes clear that for those parties who chose not to sign, the opportunities to participate in future aspects of the Section 106 process are diminished. In light of that choice imposed by the agencies, the Montlake Community Club has signed the PA (see enclosed signature page and response form). However, there are many areas in which the PA does not sufficiently mitigate adverse effects on Montlake historic resources, and without limitation, we specifically take issue with the provision in Section IX.D which states that signatories to the PA agree that the PA appropriately resolves adverse effects from haul routes.

As we have noted previously, the PA does not provide sufficient limitations on the contractor's selection of haul routes. We urge the agencies to eliminate East Lynn Street/19th Avenue as a potential haul route, given the known susceptibility to historic resource damage

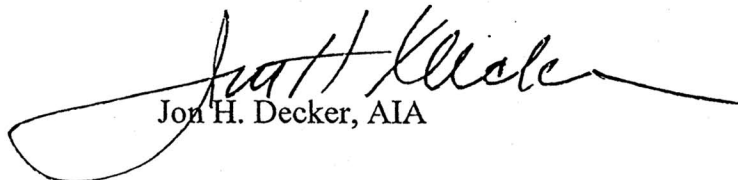
along that route. Moreover, although the vibration monitoring and management has been strengthened as a result of our comments, the PA stipulations are still inappropriately vague. We again urge the agencies to adopt a specific standard for vibration control and measurement. (Please see item no. 15 on pages 8 – 9 of our letter of April 4, 2011.)

In addition, we request that Section VII.G.4 be amended to add the Montlake Community Club as a party able to review and comment on vibration best management practices. If no further amendments to the PA will be considered, then in the alternative, we request that this measure be included in the CCMP. Extensive community knowledge of local conditions can result in helpful feedback to the best management practices. Thus, in addition to DAHP, the Montlake Community Club should have the express right to review those best management practices, given the potential for serious adverse effects on Montlake historic resources.

Finally, the agencies have taken the position that post-construction traffic does not have an adverse effect on historic resources. We disagree with that position, but recognize that you have chosen to treat that as an EIS issue instead. Montlake will closely review the Final Environmental Impact Statement regarding this and other issues.

In closing, we thank you for considering our points of view, and we look forward to continued involvement in the Section 106 process on behalf of our community.

Very truly yours,



Jon H. Decker, AIA

Enclosures

cc w/o encls: Allyson Brooks, DAHP  
Karen Gordon, City of Seattle