Port of Seattle

September 22, 2006

Ms. Kate Stenberg
AWV Environmental Project Manager
AWV Project Office
WSDOT
999 Third Avenue, Suite 2424
Seattle, WA 98104-4019

Re: Port of Seattle—Comments on the Viaduct/Seawall SDEIS

Dear Ms. Stenberg:

Thank you for the opportunity to comment on the *Supplemental Draft Environmental Impact Statement for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project*. We very much appreciate the team's effort, and its willingness to provide an opportunity for Port staff to participate in the process. This already allowed us to include many Port concerns in the analysis, even if they are not addressed directly in the document we are commenting on today. We are looking forward to continuing work with the project team to address these and other, as yet unidentified, issues.

L-014-001

Our letter from Port of Seattle Commission Vice President Lloyd Hara to Secretary McDonald and Mayor Nickels (please see attached) outlines the Port's major concerns regarding the SDEIS. For your ease of use, this letter repeats—and expands on—the points made in the policy-level letter.

A. Project Long-term

1. Maintaining corridor capacity

L-014-002

a. Selected design alternatives

We fully support the decision to carry forward only the alternatives that retain the existing capacity of the corridor. The region, and the state, cannot afford the congestion and related economic impact of the 40-50% reduction in capacity that a surface alternative would create. SR-99 is not a local street, it comprises a significant percentage of the north-south highway capacity through the City of Seattle. It is in the entire state's interest to maintain that capacity.

L-014-001

The letter to Secretary MacDonald and Mayor Nickels is included at the end of this correspondence.

L-014-002

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Tunnel Alternative in 2006. We also appreciate receiving your comments on the 2010 Supplemental Draft EIS and support of the preferred Bored Tunnel Alternative, which is item L-001 in Appendix S. The lead agencies recognize and acknowledge that the existing capacity of the corridor must be sufficient. Chapter 3, Alternatives Description, of the Final EIS discusses the current configuration of the proposed build alternatives. Chapters 5 (Permanent Effects) and 6 (Construction Effects)describe the right-of way effects for each alternative.

L-014-002

We prefer the stacked tunnel for the tunnel alternative due to its somewhat lesser right-of-way impacts on the waterfront.

b. Capacity and functionality of Alaskan Way surface

L-014-003

Freight mobility

Any design configuration for Alaskan Way surface must ensure that the route is safe and reliable for through-traffic, including over-legal trucks and trucks carrying flammable materials. Alaskan Way surface is, apart from Interstate 5, the only "over-legal" north-south freight route through downtown (transporting by special permit). All flammable materials will be prohibited from a Viaduct replacement facility, be it a tunnel or an aerial structure, at least part of the day. Alaskan Way Surface will then be essential for fueling trucks traveling to Fisherman's Terminal and other maritime uses in the BINMIC/Ballard area from Harbor Island fueling facilities.

L-014-004

In-traffic streetcar reliability and impact on cruise at P-66

The tunnel design for Alaskan Way surface places the streetcar, together with vehicle traffic, in the center lanes. We urge further analysis of its trip reliability and impact on other traffic, especially freight, and cruise-related trips. Alaskan Way, more so than other streets, is periodically subject to severe congestion due to train crossings (closing Broad, Vine, Clay and Wall Streets); stadium traffic pre- and post-events; and ferry traffic unloading from Colman Dock. With the current design, the streetcar will be subject to the same stop-and-go traffic as other vehicles sharing its lanes, which will impact the headways it can achieve and maintain. To date it does not appear that these congestion impacts have been analyzed in sufficient detail.

We are particularly concerned about the design of Alaskan Way surface north of the aquarium, where congestion occurs today. Rail traffic is forecast to double from 2001 to 2020, blocking traffic twice as long (North Waterfront Access, 2001). Freight train blockages are usually 5-10 minutes per train and will become longer as intermodal trains increase in length. Operational modeling that evaluates the movement of all modes in the corridor, as well as events like ferry (un)loading, is needed.

A comparison analysis of the streetcar modeled (1) as proposed, contrasted with (2) being in dedicated right-of-way all along the waterfront, or (3) consolidating to one track near the aquarium and continuing north with a separate right-of-way, single-track to the northern terminus of the streetcar line, would test this issue.

L-014-003

The City of Seattle, through its Central Waterfront Project, will develop final designs for Alaskan Way. At this time, it is anticipated that there will not be any changes to the roadway classification or use of a future surface Alaskan Way. Over-legal trucks and trucks hauling flammable materials are expected to continue using this route once construction is complete.

L-014-004

Construction of the Olympic Sculpture Park in 2007 led to the indefinite suspension of the George Benson Line Waterfront Streetcar service because it displaced the vehicle storage and maintenance facility. King County Metro currently provides replacement service with fare-free bus service on the Route 99 Waterfront Streetcar Line. The routing and stop locations for this line do not exactly duplicate those of the waterfront streetcar; however, Route 99 serves the same neighborhoods—the waterfront, Pioneer Square, and Chinatown/International District. With the Bored Tunnel Alternative the final location of the streetcar will be determined by the Central Waterfront Project being led by the City of Seattle. Both the Cut-and-Cover Tunnel and the Elevated Structure Alternatives include the streetcar along Alaskan Way.

L-014-004

Ridership levels for the streetcar north of the aquarium may not justify double track operation. Moving to a separate right-of-way, single track at that location could help the streetcar avoid vehicle congestion at at-grade train-crossings and at Pier 66 (P-66) cruise terminal.

L-014-005

In addition, it will be necessary to ensure that large trucks (53' trailer) and buses, which currently need to turn from the outside north-bound lane onto the apron at P-66, will be able to make that movement across/under two streetcar tracks and related overhead wires, should the streetcar remain in the center lanes.

L-014-006

c. Capacity and functionality of rail operations

We support the project team's preference for a reconfigured Whatcom rail yard because it has less impact on rail operations. Increasing numbers of both trains and train lengths will make full replacement of the current tail track length critical.

L-014-007

2. Elliott/Western ramps

We appreciate that both remaining alternatives now retain the Elliott/Western ramps, unlike in the DEIS. They are essential for moving freight between the city's two manufacturing-industrial centers. They also provide access from the viaduct to a planned cruise terminal at Terminal 91. The SDEIS, however, does not provide information on the grade of the north-bound off-ramp at Western; it should be designed for trucks.

L-014-008

3. Grade separation at Broad Street

The SDEIS removed the underpass at Broad Street providing grade separation from the BNSF mainline at Alaskan Way surface. However, the need for a grade-separated arterial connected to Belltown will increase, rather than decrease, over the planning horizon of the project. This affects access to our facilities on the north waterfront.

L-014-009

4. North of Battery Street Tunnel

The SDEIS proposes partially lowering Aurora from the Battery Street Tunnel to Republican Street, in conjunction with a design for a widened, two-way Mercer Street. We support the concept of the Partially Lowered Aurora, reconnecting the street grid, combined with two-way Mercer Street. The design and construction sequencing of these new components must provide for a viable truck corridor between Terminal 91 and I-5.

L-014-010

5. Access and impacts to Port properties

Many of the Port's facilities, and the tenants using these facilities, will be impacted by the project. It will be critical for the project team to

L-014-005

Construction of the Olympic Sculpture Park in 2007 led to the indefinite suspension of the George Benson Line Waterfront Streetcar service, because it displaced the vehicle storage and maintenance facility. With the Bored Tunnel Alternative (preferred alternative) the final location of the streetcar will be determined by the Central Waterfront Project being led by the City of Seattle.

L-014-006

The configuration Whatcom Railyard and the viaduct replacement in this location was addressed in the S. Holgate Street to S. King Street Environmental Assessment and is no longer part of the Alaskan Way Viaduct Replacement Project.

L-014-007

The project has evolved since 2006. Please refer to the Final EIS for updated information. The preferred Bored Tunnel Alternative would remove the Elliott and Western ramps. The connection between Alaskan Way and Elliott and Western Avenues would be constructed as a separate independent project associated with the Bored Tunnel Alternative. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would provide ramps at Elliott and Western Avenues, similar to the existing viaduct structure. Both configurations are designed to accommodate trucks and meet current design standards.

L-014-008

The Port's concern regarding grade separation for the BNSF mainline at Alaskan Way surface street in the north waterfront is acknowledged. These improvements are not currently included as part of the design for the Alaskan Way Viaduct Replacement Project. Because the project has evolved since comments were submitted in 2006, please refer to the Final EIS for current information.

L-014-010 communicate with our tenants to understand their needs before a final design decision is made.

L-014-011

a. **South Segment: Terminal 30**

The SDEIS describes an option for a south segment design ("Relocated Whatcom Yard") that would move Whatcom rail yard to the east of its existing location. This relocation would require approximately 65,300 square feet, or about 5% of the land area on T-30. (Appendix K, p. 18-19.) The SDEIS indicates that this is not expected to result in displacing existing uses. However, the Port of Seattle is in the planning process for relocating the existing cruise terminal to Terminal 91, returning T-30 fully to container uses. We hope that move to be complete before SR-99 reconstruction begins. T-30 is, in its current size, a very constrained container facility, and loss of the land area indicated by the SDEIS would have a negative impact on the use of the terminal for containers. We could not accept such loss and concur that this should not be the Preferred Alternative.

We appreciate that the project team has worked together with Port staff since the SDEIS was closed for information to avoid loss of land on T-30. The current design alternatives accomplish this goal without the Relocated Whatcom Yard option. (Note: Appendix I, p. 34-5 discusses impacts on Terminal 30 only as a cruise ship terminal, not reflecting the proposed new use.)

L-014-012

b. **South Segment: Terminal 46**

Similarly, the design for the south end of the project, as described in the SDEIS, would require a significant land take on Terminal 46. It would also require all trucks serving North SIG yard from the waterfront to use an elevated structure. These design features are of great concern to us. We appreciate the project team's efforts to address our concerns with a new, improved design developed since the SDEIS was closed to new information. We will continue to work with the project team to develop a final design that meets the freight needs for both the region and our cargo.

L-014-013 Remaining issues include the amount of land that will be required to accommodate a new tail track for the SIG and Whatcom rail yards on the eastern edge of the terminal. That includes its impact on truck gate lane operations, the loss of parking, and emergency access to the terminal. Poles for a new overhead utility system will need to be located to minimize impacts on the operation of the terminal. Additional concerns are related to the noise impact of

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The project acknowledges the Port's concerns regarding mobility for the freight corridor in general, and specifically between Terminal 91 and I-5 during the construction period. Freight issues and challenges are addressed in the Final EIS and Appendix C, Transportation Discipline Report. The Final EIS and Appendix C describe the current configuration in the north project area for all alternatives, which includes reconnecting the street grid and changing Mercer Street to a two-way street. The lead agencies are committed to working with the Port to minimize impacts throughout the duration of construction.

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FHWA, WSDOT, and the City of Seattle appreciate the Port of Seattle's cooperation to discuss the access concerns for the Port and its tenants. Access to businesses (including Port and tenant facilities) will be maintained throughout construction. If changes to access are needed during construction, the project team will work with the businesses affected to mitigate the impacts to the extent practicable.

The issue of accessibility during construction for businesses and residences will continue to be addressed in the on-going construction impacts evaluation and through ongoing work of the project staff, in coordination with stakeholders from businesses, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

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The lead agencies for the project anticipate continued cooperation with the Port of Seattle and other prominent property owners in the project area. The potential relocation of the Whatcom Railyard to the east of its current location was previously identified as a design option. Under the current design, this option is no longer proposed and property from Terminal 30 would not need to be acquired.

L-014-013

switching operations directly adjacent to our tenant's administration building. We will continue to work with the project team to minimize and/or mitigate these impacts.

L-014-014

c. **Central: Pier 48**

Both the DEIS and the SDEIS assume that the Washington State Department of Transportation and the Port will negotiate the Port's sale of Pier 48 to WSDOT for viaduct construction and improvements to the ferry terminal at Colman Dock. The only access currently under consideration uses the P-48 uplands. What are the potential alternatives to this approach given the sale has not yet been negotiated? If the state acquires T-48, the question is how the state would address impacts on, or replace the Alaska Square Park.

L-014-015

d. **North Waterfront: Cruise ship operations at Pier 66**

Both the cruise ships at P-66, and the Victoria Clipper vessels at P-69, rely on landside access from Alaskan Way.

- **Cruise passengers**

  On days when there is a port call (Fridays through Mondays in 2006), a street use permit provides for use of the south-bound parking lane for passenger drop-off and pick-up and taxi queuing. Early design called for "bulb-outs" at pedestrian crossings, these would make it more difficult for taxis to advance in queue. Also, charter busses access the off-street passenger loading lot from the north; the design must provide sufficient turn radii for those buses.

- **Cruiseship deliveries**

  Each cruise ship port call also generates about 40-50 truck trips for re-provisioning, about 20 of these trips are made by trucks with a 45 or 53' trailer. These trucks are directed to approach from the south, because the turning radii from the north are insufficient for those movements.

  Secondly, the current street design calls for two streetcar tracks (northbound & southbound) in the innermost traffic lanes, with station platforms sited in the median. Our concern is further congestion in the cruise ship area at P-66. Currently, P-66 operators call the trucks in for specific delivery times to address security and traffic management issues. Due to limited

Construction has started on the S. Holgate Street to S. King Street Viaduct Replacement Project. This project is part of the Alaskan Way Viaduct and Seawall Replacement Program. The S. Holgate Street to S. King Street Viaduct Replacement Project will build a new section of SR 99 that will have three lanes in each direction south of S. Royal Brougham Way and new on- and off-ramps near the stadiums. A new S. Atlantic Street overcrossing will improve connections between the Port of Seattle and major freeways by allowing traffic to bypass passing trains.

L-014-012

None of the build alternativeswould require that Terminal 46 property be acquired. Construction activities proposed for Terminal 46 with the Bored Tunnel Alternative would be related to materials and spoils transshipment would include erecting and operating a conveyance system for transferring material/spoils onto barges. The conveyors and hoppers would be erected to avoid roadway closures and obstructions to ferry terminal and Terminal 46 access. The design and construction of the conveyance system will be determined by the Design-Builder. Appendix B, Alternatives Description and Construction Methods Discipline Report of the Final EIS provides more detail on the construction process.

L-014-013

The lead agencies appreciate the Port of Seattle's cooperation in addressing the gate operation, freight access, parking, utility, emergency service issues, and developing mitigation measures. Construction has started on the S. Holgate to S. King Street Viaduct Replacement Project. This project is part of the Alaskan Way Viaduct and Seawall Replacement Program. The S. Holgate to S. King Street Viaduct Replacement Project will build a new section of SR 99 that will have three lanes in each direction south of S. Royal Brougham Way and new

L-014-015

shipside space on the apron, a small number of trucks must hold for final apron access in the eastern, outside north-bound lane. With the current street and trolley design proposal, when a trolley is stopped at an adjacent station stop, through traffic on Alaskan Way would be blocked.

L-014-016

- **Terminal operating characteristics**

  For your information, below is further detail on our cruise ship operations. Our cruise terminals operate from May to October. Port calls occur on Friday, Saturday and Sunday, with some Monday and Thursday operations. We expect to have regular sailings on two weekdays by 2008. Passenger and goods delivery trips are generally between 8 am and 5pm. The annual schedule for ships calling at P-66 can be viewed on the port's website at:

  http://www.portseattle.org/seaport/cruise/cruiselinesandschedules.shtml#schedule

  Cruise ship port calls can generate over 1,200 passenger vehicle trips:

Number of Vehicle Trips Generated by Passengers on a Cruise Ship

Mode of Travel	Vehicle Occupancy	1,800 Passenger Ship		2,800 Passenger Ship	
		Drop-off	Pick-up	Drop-off	Pick-up
Pass. Veh. Parked [a]	2.0/veh.	165	165	210	210
Pass. Veh. Drop-off [b]	2.0/veh.	110	110	140	140
Buses [b]	33.0/veh.	100	100	128	128
Taxis [b]	2.0/veh.	110	110	140	140
Total		485	485	618	618

[a] Each drop-off and pick-up passenger on, trip on each end of the cruise. [b] Each drop-off and pick-up passenger two trips on each end of the cruise. (Source: Fehr Transportation, Traffic Impact Analysis for Cruise Ship Terminal at Terminal 30, September 9, 2002.)

L-014-017

e. **North Waterfront: Other issues related to Pier 66 (the Port's "Central Waterfront Project")**

- In addition to our first cruise ship terminal, Pier 66 is also home to the Bell Harbor International Conference Center, a restaurant complex, a maritime museum, grocery market and sandwich shop, and several public access viewpoints. Our World Trade Center is located on the east side of Alaskan Way surface. These businesses rely on access along Alaskan Way surface. Both pedestrian and vehicular access is important.

L-014-018

Appendix I, p. 25, does not recognize the public access points at Pier 66. Further, Section 5.3.3, p. 41, mistakenly identifies

on- and off-ramps near the stadiums. A new S. Atlantic Street overcrossing will improve connections between the Port of Seattle and major freeways by allowing traffic to bypass passing trains.

L-014-014

WSDOT and the Port of Seattle completed the purchase of Pier 48 in August 2008. As identified in the 2006 Supplemental Draft EIS, both the Cut-and-Cover Tunnel Alternative and Elevated Structure Alternative would displace the Alaska Square Park. As identified in the 2010 Supplemental Draft EIS, WSDOT intends to use the uplands for contractor parking as part of the construction-related activities for the Bored Tunnel Alternative. These activities would not affect Alaska Square Park.

L-014-015

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

L-014-016

Thank you for the information provided.

L-014-017

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the

L-014-018

two Government Institutions in the north waterfront, as both located at Pier 69. Similarly, Exhibit 6-4, p. 60 should reflect POS Cruise Ship terminal at Pier 66 and Port Headquarters, at Pier 69. The passenger vessel facilities (leased to Clipper Navigation) should be included as well.

L-014-019

- The SDEIS indicates that, while the seawall has been improved when Bell Harbor was built, soil improvements will be required in front of P-66. (Appendix B, p. 20.) We continue to be concerned about the potential impact of soil strengthening work along Alaskan Way on the stability of our bulkhead and the buildings owned by the Port. Beyond P-66, we are also wondering whether jet-grouting will allow the concrete to sufficiently penetrate the forest of timber piles supporting the relieving platform to create uniformly firm soil-concrete mix. (The SDEIS drawings showing the grouting process do not contain any wood pilings.) The project team should consult with our engineers regarding potential impacts to P-66 as part of the FEIS process.

L-014-020

f. North Waterfront: Lenora Street Pedestrian Bridge

We appreciate the fact that the SDEIS acknowledges that the bridge would be displaced during construction, and that it states that it will be replaced with a similar structure once construction is complete. As previously discussed, this facility is owned and maintained by the Port. It is subject to a pedestrian easement that was required as part of a street vacation agreement with the City of Seattle. We expect replacement will include the public seating and waterfront viewing area at the top of the elevator/stairway tower as designed.

L-014-021

g. Pier 69

Pier 69 is serving as the Port's headquarters, it is also home to Clipper Navigation, operating a passenger vessel terminal, and Fugro Seafloor Surveys, a water-dependent tenant. Analysis of the impact of the design for Alaskan Way surface, as outlined under A.1.b. will show whether the project provides appropriate access.

L-014-022

6. Core versus full project

In addition to introducing changes to design and construction plans, the SDEIS also proposes using available and projected funds to construct a "core project". Project components not contained in that core would be built at a later, as yet unspecified time. However, the document does not discuss the impacts of this proposed approach. The FEIS should describe

extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

L-014-018

Appendix I, Social Resources Technical Memorandum, of the 2004 Draft EIS has been updated considerably. Please see Appendix H, Social Discipline Report, of the Final EIS for the current discussion of public access, including trails, pedestrian bridges, and shoreline access.
The report text and exhibits have been revised to correctly identify that the Port of Seattle Cruise Ship Terminal is located at Pier 66. In addition, the report text and exhibits have been expanded to identify that the Port of Seattle leases property to Clipper Navigation, Inc., for operation of their passenger vessel facilities located at Pier 69.

L-014-019

Soil improvements in the vicinity of Pier 66 would improve soil stability and would not compromise the structural integrity of the existing Port buildings and bulkhead.

Your concerns regarding efficiency of jet-grout treatment in the relieving platform piles are acknowledged. With the preferred alternative, the Bored Tunnel Alternative, jet grouting would not be required because the alignment of the bored tunnel curves away from the seawall beginning around Yesler Way up to First Avenue. However, jet grouting could be used if the Elevated Structure Alternative or Cut-and-Cover Tunnel Alternative is selected. Please see Appendix P, Earth Discipline Report, for greater detail on this soil improvement method.

L-014-022

the rationale for selecting project components for the core project (e.g. for including Steinbrueck Park walkway rather than the north seawall), and outline the traffic and economic impacts of focusing on the core project only.

We are particularly concerned that the northern portion of the seawall is not included in the core project. Yet its failure, and related failures of the main rail line and Alaskan Way surface, would have severe impacts on international trade, and the economy of the region. The FEIS should address the impacts of a potential failure of the north seawall. We cannot lose sight of this critical infrastructure. We look to the City for a funding and implementation plan that ensures it will be replaced within a reasonable timeframe.

It will also be critical to consider the timing of providing the Aurora improvements north of Battery Street Tunnel since construction will require the full or partial closure of Aurora north of the Battery Street Tunnel. Construction of this project component must be coordinated and timed to minimize disruption to both the SR-99 and the east-west corridor.

L-014-023

7. Coordination with proposed land use changes

The SDEIS summarizes concurrent land use and comprehensive planning efforts along the waterfront and in the South Downtown area, the City's Waterfront Concept Plan and the Livable SODO plan (Appendix G, p. 15-17). It discusses the continued need for industrial land within the City's boundaries, 77% of which are located adjacent to the south end of the project, and points to future City policies "for protecting industrial land for industrial uses". Yet, the document then goes on to indicate that, by providing improved connections between Pioneer Square and the waterfront, it may reinforce zoning changes being considered under the Livable SODO planning effort.

The Port has consistently voiced concerns with regard to plans to change zoning designations and densities in the stadium overlay area. We continue to oppose any changes in zoning or increased densities that have the potential to negatively impact access to and the viability of our container terminals, in particular T-46 in this case. The project should not be used as a stepping stone for facilitating such change with deleterious impacts to industrial operations.

L-014-020

Where elements such as the public seating and viewing area associated with the Lenora Street bridge are disturbed by the project, the lead agencies are committed to restoring those elements to a condition that is equivalent to the original.

L-014-021

The issue of accessibility during construction for businesses and employees shall be more directly addressed in the ongoing construction impacts evaluation and through ongoing work of the project staff with the Waterfront Piers, Pioneer Square, and Downtown. The project will maintain access to all waterfront businesses during all phases of project construction, regardless of alternative.

L-014-022

There is no longer a core versus full project. After the 2006 Supplemental Draft EIS was published, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2006, please refer to this Final EIS for the current information.

The Final EIS and Appendix B, Alternatives Description and Construction Methods Discipline Report, describe the current alternatives. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront. With the Bored Tunnel Alternative, the seawall would be replaced by the City-led Elliott Bay Seawall Project. If the Cut-and-Cover Tunnel Alternative or

8. Environmental impacts

a. Air quality

L-014-024

- **Toxics**

  This region is in attainment with all National Ambient Air Quality Standards (NAAQS). The highest air quality priority is reduction of exposure to toxic air pollution. The SDEIS air report compares modeling results to the NAAQS with an emphasis on carbon monoxide which has not been a problem pollutant in this region for a decade or more. Air toxics from mobile sources, especially diesel engines, pose the greatest risk to the public from urban air pollution. The SDEIS reflects that EPA rules reducing emissions from mobile sources will reduce air toxics even though VMT is increasing. The SDEIS analysis does not evaluate the magnitude of the health risks compared to the existing, construction, and operational phases.

  The project should consult with the Puget Sound Clean Air Agency regarding adequate evaluation of the risks and mitigation to assure adverse public health impacts are avoided during construction and operation of the new facility. Failure to do so could put costly additional pressures related to air toxics on future projects. The Puget Sound Clean Air Agency has requested much more detailed modeling of air toxics impacts as part of environmental evaluations for redevelopment projects that include diesel sources. All entities with projects related to diesel emissions, should do the same to help avoid adverse public health, economic, environmental, and operational problems in the future.

L-014-025

- **Alternatives and air quality**

  The tunnel alternative would result in lower air emissions from the viaduct along the length of the underground sections, so it is probably the best choice for air quality reasons. However, the highest levels of particulate pollution in the City are measured at a monitoring station in the Duwamish so special care to avoid increasing emissions at the south end of the tunnel is needed to minimize risk to public health and to avoid violation of National Ambient Air Quality Standards. The vent for emissions referenced in Section 5.1.3 should be vented through an air pollution treatment device to avoid hot spot exposures in the waterfront area if it is used for more than emergency purposes as stated.

Elevated Structure Alternative is selected, the seawall would be replaced as part of the project.

L-014-023

The project is not expected to facilitate a substantial amount of new development. The preferred Bored Tunnel Alternative would create the potential for some new development opportunities including sites in the south project area. Through its planning efforts in the South Downtown area, the City is studying future land uses there and will consider the appropriateness of zoning designations or density levels that differ from existing uses. The City Planning Commission has also recommended that City staff develop a strategy to address the protection of industrial land and uses throughout Seattle, including the south downtown area. It is expected that policies adopted as a result of these efforts will have a greater influence in guiding future development proposals in the project area than the the build alternatives.

L-014-024

A Memorandum of Agreement has been developed between WSDOT and the Puget Sound Clean Air Agency to help eliminate, confine, or reduce fugitive dust during the construction period. State and federal environmental regulations, as well as the air conformity regulations, will be followed. Please see the Final EIS Appendix M, Air Quality Discipline Report, for the current methods used to assess air quality effects for this project and for the effects discussion. Mitigation measures will be in place during the demolition and construction of the project as discussed in Chapter 8 of the Final EIS, and in the Air Discipline Report.

Mobile Source Air Toxic (MSAT) emissions have been analyzed in the Final EIS. This analysis follows FHWA guidelines. FHWA has developed this approach because currently available technical tools do not allow a prediction of the project-specific health effects (such as health risks) that would result from the potential emission changes associated with a

L-014-026

- **Efficient truck and goods movement**

  The completed project must enhance connectivity for trucks coming to and from the Port both during construction and in final operation to assure excess idling and extra trip length do not increase emissions resulting in problems noted above. Efficient goods movement is very important for air quality since trucks operate through the City. People located closest to the sources are the most impacted. The highest levels of air pollution are measured in the south harbor area so attention to freight efficiency is vital.

L-014-027

b. Noise and vibration

The proposed new south end design, as well as the design contained in the SDEIS, moves the tail track for the SIG and Whatcom rail yards close to the administrative building on T-46. The project must take care to minimize and mitigate noise and vibration impacts generated by switching movements on staff in that building.

L-014-028

c. Parks and recreation

Our concerns about the potential loss of public access owned and operated by the Port are outlined above in section 5.f.

L-014-029

d. Fisheries, wildlife, and habitat

The Port's 2004 DEIS comments on the fisheries, wildlife, and habitat included the following statement:

"Potential aquatic habitat compensation actions linked to seawall, tunnel, and Colman Dock improvements are described at four existing Port facilities:

- Pier 70/Myrtle Edwards Park—this is assumed to include Elliott Bay Park as well;
- Pier 89;
- Pier 48; and
- The northeast corner of Terminal 5.

However, the Port has also identified these sites for mitigation of its own projects if future Port development requires habitat mitigation. The Port's costs for future mitigation would be much higher if the preferred alternative utilized these sites and the Port were forced to find alternative mitigation sites. Our preference is to

project. These limitations and more information on the MSAT analysis is discussed in the Final EIS Appendix M, Air Quality Discipline Report.

L-014-025

The exhaust from the ventilation stacks and tunnel portals were modeled in the Final EIS, and, based on this modeling, no exceedance of the National Ambient Air Quality Standards (NAAQS) would occur. In addition, the air that will be released through the tunnel's portals and ventilation stacks will primarily be air--with vehicular contaminants being only a very small fraction of the exhausted air. As such, any treatment system would have to process huge amounts of air to control very small (and diluted) amounts of pollutants. This would require very large and expensive emission control equipment (e.g., scrubbers, electrostatic precipitators, etc.) as well as the generation of substantial amounts of electricity (that would in turn generate additional air pollutants), which, according to the results of the air quality analyses, are not needed to meet the applicable air quality standards at nearby sensitive land uses.

L-014-026

The project team will work with the Port of Seattle to ensure that access to businesses and Port activities is maintained throughout construction. If changes to access are needed during construction, the project team will work with the Port to mitigate impacts to the extent practicable.

The build alternatives presented in the Final EIS, along with the S. Holgate Street to S. King Street Viaduct Replacement Project, will enhance connectivity for freight between SR 99, SR 519, and the waterfront via the new SR 99 stadium area interchange. This should help reduce delay and idling and reduce vehicle emissions in the immediate area.

L-014-029

retain these sites for Port use. If this is not possible, the project must mitigate these additional costs to the Port."

While we appreciate the fact that the project design on which the SDEIS is based reduces aquatic impacts at P-48, we remain concerned that this issue has not been addressed further. We continue to object to these Port properties being identified as mitigation sites. We urge you to include the Port in any habitat enhancement and restoration discussions, planning, and design.

B. Construction Impacts

L-014-030

The construction impacts for the replacement of the viaduct and the seawall will be massive and should be identified as significant adverse impacts.

Construction staging and detours will have a major impact on many of our tenants. We have attempted to address their concerns in our comments and will continue to do so throughout the process. However, it will be essential for the project team to contact these tenants and work with them as construction staging, detour and closure plans are developed. The SDEIS states that there will be a Construction Transportation Management Plan, and a Business Relocation Plan, both of which the Port and its tenants will need to review and comment on.

Similarly, the project will require takings under any design alternative. At this point, the impact on the Port is unclear. The SDEIS states that a Relocation Plan will be developed as part of the FEIS. We need the opportunity to review and comment on the plan.

The SDEIS contains only a very limited amount of information on construction impacts. Regarding that limited information, we have the following comments:

L-014-031

1. Construction schedule and comparison of alternatives

The AWV Project team has reported in other media (including the AWV project website) that the tunnel could be constructed in 7 to 10 years while the elevated structure could be constructed in 10 to 12 years. These time frames appear to result from the manner in which the design alternatives were paired with construction options for the purpose of the SDEIS analysis. The detailed construction analysis presented in Chapter 6 of the SDEIS has paired the tunnel with two construction options—the shorter plan and the intermediate plan—and has paired the elevated structure with only the longer construction plan. For the purpose of the SDEIS, this is acceptable for bracketing the potential impacts associated with any of the construction plans. But it is misleading.

L-014-027

None of the propose build alternatives evaluated in the Final EIS move the tail track closer to the administrative building on T-46.

L-014-028

Your concerns regarding the Lenora Street Pedestrian Bridge are addressed above in the response to L-014-020.

L-014-029

No in-water work is proposed as part of the preferred Bored Tunnel Alternative and no aquatic habitat compensations actions would be necessary. If the Cut-and-Cover Tunnel Alternative or Elevated Structure Alternative is selected, appropriate mitigation for habitat loss or function would be established. Specific reference to the listed Port properties was eliminated for the Final EIS as potential mitigation sites. Coordination will continued between WSDOT, the Port, and other entities for developing appropriate mitigation for improving the marine habitat of Elliott Bay.

The City of Seattle is leading redevelopment efforts and associated environmental reviews processes for the central waterfront, which would take place under NEPA and/or SEPA as appropriate. In addition, the project compliments a number of other projects with independent utility that would provide other improvements such as the seawall replacement, transit enhancements, and a new Alaskan Way Promenade and public space. These individual projects include the moving forward projects identified in 2007, as well as improvements recommended as part of the Partnership Process. Please refer to Chapter 2, Alternatives Development, of the Final EIS for a description of these projects.

L-014-030

WSDOT will continue to coordinate with the Port to maintain essential conditions for freight mobility and minimizing construction effects. Overall

L-014-031

Chapter 1 of the SDEIS describes the "Changes Made to Construction Plans" (page 4). In that section it states that "the Tunnel and Elevated Structure Alternatives could be built under any of the three construction plans." The time frames listed range from 7 to 9.5 years for the tunnel alternative and 6.5 to 10 years for the elevated alternative. Therefore, other media that compare these two alternatives should use the full range of construction options for both alternatives rather than just the analysis assumption used for the purpose of the SDEIS.

L-014-032

2. Analysis and comparison of construction scenarios

In addition to proposing design changes, a second reason for publishing a Supplemental DEIS was to provide information on new options for construction planning. However, while the document does outline three different construction scenarios, it does not address major construction-related issues that are of critical importance to the Port, the waterfront, and the region as a whole. It provides only minimal information on what will happen under different construction scenarios, stages, and/or methods. We are unable to interpolate the impacts on a parcel-by-parcel basis along the waterfront, nor the impact on the corridor itself, and nor extrapolate the impact on the region as a whole. For example, the exhibits addressing Alaskan Way do not distinguish closure information south of Pike and north of Pike, where we know closures will also be necessary for Seawall construction.

We cannot support any construction plan that does not provide adequate information.

L-014-033

3. Economic impacts

Like the DEIS, the SDEIS focuses the analysis of economic impacts on jobs, sales and taxes related to construction activities, and the impact on businesses in the immediate vicinity of the project. It alludes to, but does not describe, any broader impacts. It does not evaluate the economic impact of different construction scenarios, stages, and/or methods beyond these factors. This applies to the impact of prolonged lack of access to waterfront businesses, including our terminals. As the largest property owner in the project area, we are concerned about impacts to our terminals, piers and other facilities. For example, we cannot see how our cruise terminal at Pier 66 and operations at Pier 69 can function with the Broad St. Detour in place: review of the Appendix P, Section 6.1.5, reflects limited understanding of cruise ship operations, referencing only passengers and charter bus access. Nor does the SDEIS address the economic impact of project-related congestion lasting for several years on the region as a whole. The SDEIS also does not contain mitigation strategies that could be employed to buffer these impacts, nor does it identify the costs of such measures.

construction effects of each of the alternatives are described in Final EIS Appendix C, Transportation Discipline Report. For environmental documentation purposes, the worst stage of construction for traffic was analyzed quantitatively while the overall construction activities were described qualitatively. Demolition of the existing Alaskan Way Viaduct would occur as part of the viaduct replacement project. As part of that project, standard maintenance of traffic during construction plans will be developed, communicated with the general public, and implemented during project construction. As part of the Bored Tunnel project and related projects, WSDOT and partner agencies have or will implement several strategies to keep traffic moving during construction. For example, both the south and north portal configurations include bus priority lanes to provide reliable travel times for SR 99 transit service into and out of downtown. The streets that transition between SR 99 and the downtown street grid are designed in a manner that meets the City's Complete Street goals and include treatments for pedestrians, bicycles, freight, and adjacent land uses. WSDOT will prepare a traffic management plan, which will contain localized traffic mitigation measures. These measures will be developed as construction details are refined. Please see the Final EIS, Appendix C, Chapter 6 of the Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

Because operational effects of the built alternative would be substantially better than the Viaduct Closed (No Build Alternative), long-term transportation mitigation measures are not anticipated. However, a number of mitigation measures in place during construction could have benefits over the longer term. Refer to Chapter 8 Mitigation in the Final EIS for details.

L-014-031

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at

L-014-033

How can our region, or the state, make a rational decision on construction of a project of this magnitude without thoroughly understanding the economic impacts, and the cost and impact of any mitigation strategies, before any decision is made? Both the impact on the businesses along the corridor, in particular along the waterfront, and the impact on the regional economy must be evaluated. We understand that the project team is in the process of developing a business mitigation plan, and expect that it will address the broader as well as the immediate impacts of construction. We cannot support any construction plan without that information.

The Port must understand the impacts of the project on its facilities, its tenants, and their business operations, as well as the cost and impact of applicable mitigation strategies, to be able to participate in funding the project. The limited information that is currently available indicates that economic impact and mitigation costs to the Port and its tenants could comprise a substantial portion of the Port's proposed financial participation in the project.

L-014-034

4. Closure of Western/Elliott Avenue ramps

Exhibit 7-3 of the SDEIS compares the closure times of SR 99 access ramps for the various construction plans. For both the shorter and intermediate construction plans, the Elliott Avenue on-ramp would be closed for an estimated 42 months; for the longer plan, it would be closed for an estimated 75 months. The Western Avenue off-ramp would be closed for an estimated 42 months for the shorter plan and for 63 months for both the intermediate and longer plans. These very long closures will significantly affect access to and from Ballard and Interbay, where the Port has substantial facilities. The AWV design team should evaluate all possible construction methods to minimize the closure time for these ramps.

L-014-035

5. Temporary facilities

The SDEIS retains the Broad Street Detour design as temporary facility intended to maintain an "open corridor." This would have profound impacts on the waterfront. The SDEIS contains no analysis of these impacts. It is unclear under which construction scenarios the detour would be required, and for how long. In-depth analysis will be needed to understand the implications of the detour alternative, including cost, corridor traffic flow, and the impact on businesses and traffic flow on the North Waterfront.

L-014-036

Specific issues regarding this temporary facility that must be evaluated mirror those expressed with regard to the 2004 DEIS:

least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

L-014-032

The information provided in the 2006 Supplemental Draft EIS describes construction in sufficient detail to convey the impacts to distinct portions of the project area and to support selecting which construction approach should be used. The Final EIS provides the current construction information. The lead agencies have been coordinating with the Port of Seattle as a major regional stakeholder since the project's beginning, and would be glad to meet with Port staff to review construction planning and potential construction impacts on Port properties or functions, as the project moves toward final design.

L-014-033

The types of impacts identified in the comment are secondary economic impacts. For the purposes of this EIS, the degree of accuracy regarding the secondary impacts are placed at the business-district level. Because of the diversity of business types along the entire 2-mile corridor, a business-by-business analysis is not feasible and beyond the scope of

L-014-036

- Traffic volumes/impact on Alaskan Way surface south of the touchdown (near Vine or Wall Streets).
- Impact on cruise ship access at Pier 66. Currently, all truck and most bus staging takes place from the outside north-bound lane due to turn radius needs. Taxi staging occurs in the south-bound parking lane. There is no alternative terminal available to accommodate these port calls.
- Access to the "north apron" of Pier 69, which provides loading docks and minor on-site parking, including ADA parking. One of our tenants, Fugro Seafloor Survey—a water-dependent business, requires large truck (WB-67) access for heavy equipment.
- Impact on Clipper Navigation's operation. Currently, Clipper Navigation ground access relies on a curb lane on Alaskan Way surface adjacent to their loading dock at P-69 on the north apron for taxi queuing, charter bus parking and loading, as well as private automobile pick-up and drop-off. In 2005, Clipper Navigation served over 335,000 passengers.
- Impact on south-bound movement of traffic from Ballard/Interbay.

L-014-037

6. Coordination with other projects

The SDEIS lists a number of transportation projects for which construction could overlap with AWV replacement. These include SR-519, Spokane St., Link Light Rail, Colman Dock, I-5, I-405. It also points out that other construction projects within the City's boundaries, such as new development in the South Lake Union area, could have impacts on the street system in that area. The document rightly points out that "If construction periods for these projects overlap, they could have a cumulative impact." The project team is expected to work with responsible agencies to avoid and minimize cumulative impacts.

We agree with the project team that coordination will be of critical importance. Unfortunately, the SDEIS does not yet contain any guidance as to how these impacts could be avoided. There is a need for a coordinated mitigation plan addressing the various public construction projects. Local development projects should be required to address the cumulative impacts of street closures due to construction activities that occur concurrently with AWV replacement.

L-014-038

7. Capacity and functionality of rail operations

The SDEIS states that train traffic along the mainline north of the north tunnel portal could be affected and interrupted by construction activities for a new retaining wall. The northern mainline is a critical freight and passenger corridor. Any rail disruptions must be kept to a minimum, both

this EIS. The Final EIS identifies those business districts that clearly have identifiable risk factors that will be directly affected by the project, such as loss of parking for Pioneer Square. The Final EIS also includes mitigation measures that will be tailored to specific high-risk business districts, including the Central Waterfront.

The economic analysis, as presented in the Final EIS, accounts for those impacts and benefits which are under the direct control of the project. Indirect and secondary impacts and benefits are identified when they can be reasonably tied to a general project activity. To go beyond this would be speculative and any conclusions that would be drawn would be subject to forces not reasonably related this project.

Port of Seattle operations are not expected to be obstructed; however, they will experience some freight mobility congestion. The cost of congestion for freight mobility is presented in the Final EIS. The regional cost of congestion for passenger cars is also discussed in the Final EIS. Mitigation measures are included in Chapter 8 of the Final EIS.

L-014-034

The lead agencies recognize the critical importance of the entire SR 99 facility, including the Elliott Avenue and Western Avenue ramps. The 2006 Supplemental Draft EIS discusses the trade-off between maintaining partial traffic capacity on the facility during construction and the savings in cost and time of closing it to traffic while construction is underway. Construction under traffic is also inherently less safe than closure, both for the construction workers and for the traveling public. Also, some designs lend themselves to construction under traffic better than others. See the Final EIS, Chapters 3 and 6, for the current description of the construction plan for each proposed build alternative.

L-014-035

The Broad Street Detour described in the Final EIS is only for the

L-014-038

along the mainline and in the yards. The construction of the south end will require some track relocations.

Yet, Appendix C, the Transportation Discipline Report ,does not discuss rail operations or how they could be impacted during construction. Please describe the potential impacts of construction to rail operations, and the mitigation to minimize these impacts.

L-014-039

8. Access and impacts to Port Properties

The SDEIS does not provide a traffic and/or business mitigation plan for the businesses along the waterfront, including our tenants, although it states that such plans will be developed. We urge the project team to work with the Port, its tenants, and other property owners on the waterfront to develop such a plan immediately and provide opportunities for public comment. Based on the limited information currently available, we offer the following comments:

L-014-040

a. Construction staging and traffic management in the South end

- The SDEIS does not specify the location of any construction staging sites in the south end, but indicates that there would be multiple sites. The location of these staging areas and detours in the south-end could potentially have a major impact on container operations at T-25, 30 and 46. All existing terminals fully utilize their respective footprint for container operations, and the redevelopment of T-25/30 to its former use as a container terminal (by 2008) also relies on use of its entire footprint. Construction staging and lay-down areas must maintain the functionality and capacity of both our container terminals and drayage routes.

  We cannot support any construction plan that does not provide adequate information or generates significant impact on our container terminals or drayage routes.

- Staging areas and detours must be designed to maintain both functionality and unimpeded access to all three terminals. Drayage routes must be maintained, and any constraints on these routes need to be discussed with our staff and terminal operators.

L-014-041

- The 2004 DEIS alluded to use of Port property for staging and other purposes during construction. We anticipate working with the project team to identify those Port properties where temporary use is feasible without negative impacts on the functionality of our facilities, and to negotiate temporary

Elevated Structure Alternative. The detour would construct a temporary trestle structure from approximately Alaskan Way and Vine Street to the intersection of Broad Street and Western Avenue. The Broad Street Detour would be in place for approximately 27 months while the improvements to the Battery Street Tunnel are completed. An updated description of the alternatives and of construction-related transportation effects is provided in the Final EIS and Appendix C, Transportation Discipline Report.

L-014-036

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

L-014-037

We agree on the need for continued close coordination and look forward to the Port's continued participation. Chapter 7 of the Final EIS discusses the potential cumulative effects of other transportation projects that may overlap with the Alaskan Way Viaduct Replacement Project.

L-014-038

Overall construction effects of each of the alternatives are described in Final EIS Appendix C, Transportation Discipline Report, Chapter 6. For environmental documentation purposes, the worst stage of construction was analyzed quantitatively while the overall construction activities were described qualitatively. As part of that project, standard maintenance of

L-014-041

construction easements where appropriate. Where construction would adversely impact access for the Port and/or its tenants, we will need to negotiate access and mitigation with the project team.

L-014-042

- The SDEIS designates East Marginal Way as a haul route for construction traffic. We generally agree that it is a good idea to designate East Marginal Way as a dedicated truck route. Our staff will continue to work with the project team to ensure that port-related drayage movement can flow between all our terminals and both the north and the main gates to the SIG rail yard as needed. This is particularly important for the terminals on East Marginal Way—T-46, 30, and 25.

L-014-043

- The maintenance facility for the Port's seaport, and many of its public access points and parks, is located at Horton St. The Viaduct construction staging and project-related congestion will make it difficult for our staff to continue to effectively serve the multiple seaport facilities they care for, many of which are north of the central waterfront. The CTMP and Business Mitigation Plan should also address impacts and strategies for these trips.

L-014-044

b. South end project construction

Due to the proximity to some of our major container terminals, the construction staging and management approach for the south end of the project is of critical importance to the Port. We very much appreciate the cooperative effort used to address Port concerns in the design process. However, we have not yet received detailed information, or had any discussions on how this project component will be constructed. Port staff will need to be involved in the development of the construction management and mitigation plan to ensure the continued operation of our terminals and drayage routes during construction.

c. Access to the Port's north waterfront properties

L-014-045

- **Pier 66 for cruise ship operation**

  The SDEIS does not address access to P-66 for cruise operations. Both access for passengers and trucks must be ensured during the cruise season. (See Section A.5.d of this letter for quantitative information.). The same operating requirements apply during the construction period:

traffic during construction plans will be developed, communicated with the general public, and implemented during project construction. Minimal effects on rail operations are foreseen. The S. Holgate Street to S. King Street Viaduct Replacement Project that is currently under construction will separate street and train traffic. A primary objective of this project is to minimize effects on freight and passenger rail operations. If closures of the rail line are necessary, they would be temporary.

The Elliott/Western Connector is conceptual at this stage and will be the subject of a separate environmental review process. The new roadway connecting Alaskan Way to Elliott and Western Avenues (in the area between Pike and Battery Streets) would be four lanes wide and would provide a grade-separated crossing of the BNSF mainline railroad tracks. The Elliott/Western Connector would provide a connection from the Alaskan Way surface street to the Elliott/Western corridor that provides access to and from BINMIC and neighborhoods north of downtown Seattle (including Ballard and Magnolia).

L-014-039

As promised in the 2006 Supplemental Draft EIS, construction mitigation plans have been developed in cooperation with the Port of Seattle and other stakeholders in the project area. These measures are included in the Final EIS. The comments provided in this letter and by the Port during the planning process have been helpful and incorporated to the extent practical.

L-014-040

Information on construction staging sites has developed and is presented in Chapter 3 of the Final EIS. The project acknowledges the importance of maintaining access to the Port of Seattle terminals (particularly Terminals 25, 30 and 46). It is a construction planning assumption that the project will maintain access to Port facilities during

L-014-045

- Limited staging for trucks and buses in the outside north-bound lane to provide for sufficient turn radius to enter the apron
- Curb space and staging for taxis, limousines, and vans carrying passengers
- Adequate access to the north waterfront itself

Of particular concern are any construction scenarios requiring the Broad St Detour. Based on current information, we cannot see how the cruise terminal would operate with two-three lanes of south-bound traffic and one lane of north-bound local traffic. Unless these concerns are resolved, we consider the Broad St Detour a fatal flaw.

- **Access to Pier 66 in general**

Other tenants at Pier 66, at the World Trade Center on the east side of Alaskan Way, and along the waterfront may also be severely impacted. We are concerned about the impacts of the viaduct/seawall project on their business livelihood and access.

L-014-046

- **Access to Pier 69**

We are also concerned about access to Pier 69 during construction, both for our tenants and our staff. The Victoria Clipper also requires access for passenger drop-off for over 300,000 passengers and deliveries, it depends on a curb/parking lane. Again: one of our tenants, Fugro Seafloor Survey—a water-dependent business, requires large truck (WB-67) access for heavy equipment.

L-014-047

- **Garage access on Elliott and Wall Streets**

Parking in the project area will be severely constricted during construction. The Port owns a large parking structure with two entries/exits on Elliott and one on Wall St. Construction staging and detour routes should ensure access/egress to/from all three gates throughout all construction stages.

L-014-048

d. **Access to Terminal 91**

Although T-91 is not directly in the SR-99 corridor, regional congestion related to construction will affect access. Of particular concern are prolonged closures of the Western and Elliott ramps, and access from the Duwamish for fuel and provisioning trucks for the fishing fleet. In addition, current plans call for a new cruise terminal at T-91, which would serve as the home port for ships

project construction.

Impacts to terminal access related to construction staging were evaluated as part of the transportation analysis in the Final EIS Appendix C, Transportation Discipline Report, which included an evaluation of circulation at and around the various Port of Seattle terminals. The project team will continue to work with the Port of Seattle as more detail on construction staging and phasing becomes available.

L-014-041

As design and construction sequencing proceeds, the lead agencies will continue to work closely with the Port of Seattle to identify necessary staging areas, negotiate any needed construction easements, and minimize impacts to Port facilities. At this time, the following Port properties are proposed for staging areas: Terminal 106, Terminal 25, Terminal 46 and Pier 46. Please see the Final EIS Appendix B, Alternatives Description and Construction Methods Discipline Report for a description of what activities are proposed for these properties.

L-014-042

The project team will work with the Port of Seattle to ensure that access to businesses and Port activities is maintained throughout construction. If changes to access are needed during construction, the project team will work with the Port to mitigate impacts to the extent practicable. WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

L-014-043

Near the Horton Street maintenance facility, the separate S. Holgate Street to S. King Street Viaduct Replacement Project is currently under construction. Coordination between WSDOT and the Port of Seattle is on going with regard to this project. With respect to the current Alaskan Way

L-014-048

now docking at Terminal 30. Access for provisioning and trucks and busses from the airport are critical:

There are generally two ships in port at the same time. Currently, there are two weekend-day and one week-day sailings. We expect the number of weekday sailings to increase by one or two weekdays during the construction timeframe. Depending on the size of the ships in port, two cruise ships calling at T-91 would generate 100-150 truck, 350-500 bus, and 4,750-6,000 car, taxi, van or limousine trips, totaling between 5,200 and 6,700 trips over the course of a day. The majority of passenger trips will occur between T-91 and the airport.

L-014-049

e. **Utilities and public services**

The SDEIS describes utility relocations in a generic fashion. It does point out that the south end will require a large number of temporary and permanent relocations, especially with a tunnel alignment. Please work with our engineers, maintenance staff, and terminal operators, as well as the railroad, to keep service disruptions to our terminals and the rail yards to a minimum. Disruptions, to the extent they are unavoidable, should be timed to minimize the impact on operations. Issues include power and gas shut-downs—recent power shut-downs on the terminal were limited to four hours or less and took place on days when there was little or no cargo activity. Also of concern is the major stormwater and sewer outfall at King St.

For the north waterfront, the SDEIS indicates that there are no utility relocations required for an elevated structure. However, relocations will likely be necessary during seawall replacement and soil stabilization efforts. The FEIS should address these issues. Again, any service disruptions should be minimized and coordinated with our maintenance staff and our tenants.

We are also concerned about emergency access and the availability of water for fire fighting purposes. The SDEIS points to potential temporary restrictions for emergency access and the fact that water may not be available during relocation of fire hydrants. These services must be available at all times.

Due to the large number of utilities involved, utility relocation will be managed by many different utilities, and carried out by an even larger number of contractors. We support the concept of a consolidated utility relocation plan, which provides one point of contact for any utility-related work.

Viaduct Replacement Project addressed in this Final EIS, a detailed discussion of the construction effects on transportation facilities and services is provided in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report. Also included in Chapter 6 is a listing of the planned construction mitigation activities which should help address effects associated with the planned construction activities north of King Street.

L-014-044

Construction staging, is discussed in the Final EIS, Chapter 6 Construction Effects. More detail on the proposed staging areas can be found in Appendix G, Land Use Discipline Report, Chapter 6. WSDOT will continue to discuss the construction plans and staging areas near the south portal with the Port to minimize impacts. The project team appreciates the continued coordinated with the Port.

L-014-045

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

The preferred alternative for the replacement of the Alaskan Way Viaduct is now the Bored Tunnel Alternative. One of the major benefits of this alternative is the ability to maintain operations on the existing SR 99 facility while the tunnel is being constructed. The Bored Tunnel Alternative would not construct the Broad Street Detour. The Broad

L-014-050

f. Seawall and relieving platform construction affecting Port terminals and/or piers

In reviewing the SDEIS, we noted that the document proposes significant construction activity near and/or under Port-owned piers and/or terminals, in particular T-46 and Piers 48, 66, and 69. Issues of concern to the Port include:

- Lack of reference to fender piles west of the seawall;
- Removal of riprap and installation of temporary sheet pile under piers west of the seawall;
- Maintaining under-pier utility connections;
- Excavation of the entire relieving platform; and/or
- Jet grouting work performed in an area were wooden piles are supporting the relieving platform. We are not confident that the concrete will flow sufficiently around these obstacles.

Please coordinate any potential work related to the seawall or the relieving plat form behind the seawall near our piers and terminals with our engineering and environmental staff. Any impacts on our facilities or tenants related to these activities will need to be mitigated.

L-014-051

9. Traffic mitigation strategies

The document begins to outline traffic mitigation strategies, and the Port generally agrees with the direction taken by the project. However, we are concerned that the SDEIS does not contain a fully developed Construction Transportation Mitigation Plan—although we understand that it is under development. Nor does the document contain any information on the impact or cost of proposed mitigation strategies. Understanding the traffic impacts, and the cost and impact of any mitigation strategies, is critical. The Port must understand the impacts of the project on its facilities, its tenants, and their business operations, as well as the cost and impact of applicable mitigation strategies, to be able to participate in funding the project. We are concerned that:

- It is difficult to understand the impact of the strategies as a package. How do these strategies work together to mitigate the project's impacts? What impact do they have on traffic in the region, beyond a localized effect?
- The information provided does not yet describe the intended and/or expected impact of the proposed strategies. That makes it difficult to tell how useful the strategies are, or whether the list includes all important, let alone all viable strategies.

Street Detour described in the Final EIS is only for the Elevated Structure Alternative.

L-014-046

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

L-014-047

The lead agencies plan to maintain access to businesses and residences throughout construction, including the parking structure mentioned by the commenter. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

L-014-048

The Elliott/Western Connector is conceptual at this stage and will be the subject of a separate environmental review process. However the new roadway connecting Alaskan Way to Elliott and Western Avenues (in the area between Pike and Battery Streets) would be four lanes wide and would provide a grade-separated crossing of the BNSF mainline railroad tracks.

L-014-051

- It would be useful to outline the goals/results of the package with regard to the main user groups/O-D pairs. Show who the target/main beneficiaries are, what is being implemented for each of the major user groups, and how it will support that group's mobility needs. Of particular concern to us is 1) Container freight among port terminals, rail yards and the highway system, 2) Cruise ships & passenger vessels, & 3) Airport.

That being said, the Port supports most of the strategies presented in the document (reference Section 10 below), they appear to be useful in mitigating the impact of AWV construction. We are looking forward to a traffic mitigation plan that provides more detailed benefit-cost information, as outlined above.

L-014-052

10. Freight mobility

The Port's general concerns regarding the status and contents of the traffic mitigation plan are presented above. The following specifically addresses freight mobility during construction.

The general objectives which form the basis of the mitigation strategies (presented in Appendix C, p. 154) are highly transit focused with only one reference to the movement of goods. Given the importance of freight movements especially in the Duwamish, higher visibility should be given to it as an objective.

L-014-053

a. Provisions for truck movement

The SDEIS outlines some of the impacts of construction on freight mobility and provides some preliminary strategies for supporting freight mobility during construction. However, the document does not evaluate truck detours and alternative routes sufficiently.

We understand that the current list of strategies is preliminary, and urge the project team to work closely with the freight community to expand and improve on the list of strategies targeting truck mobility to ensure that trucks can move. This includes both making the movement of freight a priority in critical truck corridors and suspending the prohibition on large trucks on at least one north-south street downtown. The congestion generated by construction will have a dampening impact on our economy. Ensuring that freight can continue to move is essential in minimizing and mitigating this impact. Treating trucks like cars on all facilities and at all times of the day will not be sufficient to achieve this goal.

As discussed in Appendix P, p 47, freight traffic (such as diesel fuel trucks) moving between the Duwamish and the BINMIC will

The Elliott/Western Connector would provide a connection from the Alaskan Way surface street to the Elliott/Western corridor that provides access to and from BINMIC and neighborhoods north of downtown Seattle (including Ballard, Magnolia, and Pier 91). The project team will continue their coordination activities with business and residential stakeholders, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups to minimize construction effects. WSDOT will prepare a traffic management plan, which will contain localized traffic mitigation measures. These measures will be developed as construction details are refined. Please see the Final EIS, Appendix C, Chapter 6 of the Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

L-014-049

Final EIS Appendix K, Public Service and Utilities Discipline Report, discusses impacts to public services and utilities in greater technical detail. Utility relocations will occur after extensive coordination between the project design team and utility providers. Utility disruptions will be minimized where practicable. Timing and scheduling of utility disruptions will be coordinated with the utility providers as design proceeds in future design phases and during the construction phase. The lead agencies will also coordinate with public service providers to maintain emergency response times or provide satisfactory mitigation. See Appendix K for more information about proposed mitigation measures to ensure that disruptions to utilities and public services are minimized.

L-014-050

Under the preferred alternative, the Bored Tunnel Alternative, seawall replacement would occur as an independent project led by the City of Seattle. The project would not touch the seawall or relieving platform if the preferred alternative is selected.

L-014-053

experience delays and a resultant productivity loss if they must rely on I-5 which is already at or near capacity. Designation of a truck route through downtown Seattle is imperative.

L-014-054

b. Sharing transit lanes

The SDEIS proposes BRT lanes in some high-density corridors impacted by construction. While we generally agree with this strategy, we need to ensure that proposed transit enhancements along key freight corridors do not reduce the capacity for truck movement. One such project is the proposed S Spokane Street Viaduct Ramp to Fourth Avenue S, where one of the new off-ramp lanes could be designated as a transit/HOV lane. Another location is the proposed BRT route on 15th and Elliott. Such a designation should be carefully reviewed to make sure that it does not limit the route choices for large trucks. Creative solutions such as allowing trucks in the transit lane or converting it back to a general-purpose lane during off-peak hours should be explored.

L-014-055

c. Separation of freight and general-purpose traffic on East Marginal Way

We support the project team's intent to focus general-purpose traffic in the south end on 1st and 4th Avenues and dedicate East Marginal Way to freight and local access. This will help maintain the functionality of T-25, 30 and 46 as container terminals and provide access to both North SIG and Main SIG rail yards. However, it is not clear how general purpose traffic would be prohibited from using this arterial. We are also concerned, that traffic generated by use of East Marginal Way as a haul route could impact access to our properties along East Marginal Way. A thorough analysis will be needed.

L-014-056

d. Extended Port terminal gate hours

One of the mitigation options presented—"Extend Port Terminal Gate Hours"—should not be required. Getting through the construction period will be difficult for everyone, including the trucks serving the Port. Port staff has worked with the Viaduct/Seawall Replacement project team on a traffic management plan that addresses the needs of both the traveling public and the international cargo moving through our Port. We will continue to do so to develop a balanced, cost-effective, and efficient approach to ensuring freight mobility.

That being said, there are limits to which the Port can effect change:

If one of the other build alternatives is selected, replacement of the seawall would occur as part of the alternative. In that event, the permanent work will be done on the inside of the existing seawall. All existing elements that will be affected by the temporary work west of the seawall will be replaced to its prior condition as the project is completed. Any riprap or fender piles that will be temporarily removed will be returned upon completion of the seawall construction work.

A test section of the construction of the seawall would be planned at the final design stage of the Cut-and-Coover and Elevated Structure Alternatives. The test section will confirm the applicability of the construction method(s). Issues such as the stability of the existing wall during the excavation of the relieving platform and the flow of any jet grouting around the existing obstructions will be confirmed at that time. The design team will coordinate with the Port staff during the planning and design stages of the test section.

L-014-051

WSDOT, King County, and the City of Seattle are providing transit enhancements and other improvements to keep people and goods moving during construction of the Moving Forward projects. These improvements include the following strategies:

- Add variable speed signs and travel time signs on I-5 to help maximize safety and traffic flow.
- Provide funding for the Spokane Street Viaduct Widening Project, which includes a new Fourth Avenue S. off-ramp for West Seattle commuters.
- Add buses and bus service in the West Seattle, Ballard/Uptown, and Aurora Avenue corridors during the construction period, as well as a bus travel time monitoring system.
- Upgrade traffic signals and driver information signs for the Denny Way, Elliott Avenue W./15th Avenue W., south of downtown, and West Seattle corridors to support transit and traffic flow.

L-014-056

- Most of the trucks serving the Port already operate outside of the commuters' peak hours. That's because our truckers don't like being stuck in traffic and are already avoiding it whenever and wherever they can.
- With the exception of a limited number of streets in the immediate vicinity of our container terminals and the rail yards, Port-related truck traffic comprises a small percentage of overall traffic. Trying to change the times in which our cargo moves may not be the best use of scarce resources.
- The Port doesn't operate its terminals, we are the landlord. We cannot tell our tenants when they should do business any more than someone who is leasing store space to someone else.
- Our tenants also do not operate in a vacuum—there are very complex labor rules and contracts that need to be honored. Changing those is difficult. The vast majority of businesses that receive freight from the Port are only open during daytime hours.
- Our tenants already open their gates and work at night when there is enough cargo to make it worthwhile—and when there is an open door at the other end of the trip. (This is the case for all of our intermodal business, that is the containers that move between our terminals and the rail yards.) One of our terminals is already operating a container yard off-site, and spending its own money to truck containers there when there is little traffic, and the businesses who own them can pick them up at their own convenience. If they aren't doing more of it, it means that it does not make economic sense.
- Keeping terminals open at night is very expensive. A cursory analysis indicates that it costs about $60,000 per night in ILWU labor alone to keep T-5, 18, and 46 open—at five nights per week that would amount to over $15 million per year. This does not yet include other costs like terminal staff and operating expenditures, security, trucking, etc.

L-014-057

11. Environmental issues

The Port commented extensively on the environmental impacts of construction described in the DEIS. Most of these concerns still need to be addressed today. Following is a list of issues that are of special interest to the Port.

- Provide information about travel alternatives and incentives to encourage use of transit, carpool, and vanpool programs.

In addition, WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

The lead agencies look forward to coordinating with the Port in the process of refining the strategies included as construction transportation mitigation measures.

L-014-052

Refer to Chapter 8 Mitigation of the Final EIS for more current information on mitigation measures. In addition, WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

L-014-053

Further analysis of the traffic effects during construction has been conducted. The Final EIS Appendix C, Transportation Discipline Report, has been updated to address more fully the needs of the freight community.

The freight mobility strategies presented in the Transportation Discipline Report will continue to evolve over the course of the project. Input from the Port and the freight community via direct outreach, plus special workshops, have been incorporated in the Transportation Discipline Report.

The lead agencies are committed to working with freight interests to minimize operational impacts during the construction. Continued dialogue among all stakeholders will continue to be an important and essential part of project development and implementation.

a. **Air quality**

L-014-058

- **Construction emissions mitigation**

  The projects needs to develop and implement a detailed construction emissions mitigation plan to assure emissions from construction activities as well as increases due to more congestion resulting from the construction projects does not adversely impact ambient air quality levels in the area. Failure to do so could result in violation of National Ambient Air Quality Standards (NAAQS) in the Seattle area. Much more expensive and difficult air quality conformity requirements could result causing delays and increased costs to future projects.

  The public is becoming more concerned about exposure to toxic air pollution from diesel engines, such as the construction equipment used for this project. The SDEIS must include air pollution mitigation details regarding how to reduce those emissions to levels to avoid such problems. The current SDEIS merely references the 2004 Draft EIS. The Port and others pointed out during the comment period that the Draft EIS did not contain sufficient details to assure these concerns are addressed during the construction phase.

L-014-059

- **Clean energy use**

  The City of Seattle is a leader in influencing policy to address climate protection. Demolition of the current facility and construction of the new will require large quantities of diesel fuel absent specifications to the contrary. The Project should consider use of efficient newer equipment operating on biodiesel blended with ultra low sulfur diesel. They should also continue the excellent work to encourage businesses and individuals in the region to use alternative transportation and fuels to minimize the energy demands from the operational phase.

L-014-060

b. **Noise, vibration and construction dust**

We continue to be concerned about the impacts of construction noise on Terminal 46, Pier 48, Pier 66 and the World Trade Center, and Pier 69. Should noise from construction activities impact existing uses at these or other facilities owned by Port, the project would need to provide mitigation:

- The proposed new south end design for the project is very close to the administrative building on T-46. The project must

L-014-054

The S. Spokane Street Viaduct to Fourth Avenue Loop ramp, now operational, provides two lanes for general purpose traffic. There is sufficient capacity during the peak hours for cars, buses, and trucks. In the 15th/Elliott Avenue corridor, Business and Transit Access (BAT) lanes have been installed between West Harrison and West Armour Streets. In general, these BAT lanes allow for vehicles intending to turn right at the next signaled intersection, or beforehand, into a business driveway, and for those vehicles merging left after turning into a BAT lane. King County Metro transit vehicles are permitted to pass through signaled intersections without turning right (as are bicycles), but other vehicles may be ticketed for doing so. The BAT lane becomes functional by restricting peak hour on-street parking and converting the parking lane to travel lane operation. The project team will continue to work with the Port and freight community to ensure trucks have reasonable access through the project corridor and affected area.

L-014-055

At this time, East Marginal Way between S. Spokane Street and Pier 46 (S. Atlantic Street) is being considered for designation as a local access, truck, and construction vehicle only roadway. The existing bicycle lane would be maintained. This designation would facilitate truck and construction haul movements, without restricting needed local access to this area. WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

L-014-056

The Final EIS has removed the reference to extending the port terminal gate hours as a mitigation strategy. The project team is committed to working with the railroad, freight shippers, and the Port of Seattle to minimize operational impacts during the construction of the project.

L-014-060

take care to minimize and mitigate noise and vibration impacts generated by construction activities on staff in that building.

- Our terminals and piers, including T-46, P-66 and P-69, are monitored with the help of with video surveillance equipment. Some of these monitoring activities are required by federal law. To ensure the security and safety of our operations, we request that construction contractors work closely with our security and maintenance staff when operating in proximity to our facilities.

L-014-061

c. In-water construction near P-66

The SDEIS discusses the methodology for replacing the seawall, and unlike the DEIS, indicates that in-water work may be necessary near P-66. The Port has carried out substantial work to strengthen the piers it owns along the north waterfront. We have capped contaminated sediment in the vicinity of our marina at P-66. Any work related to the seawall should be coordinated with our engineering and environmental staff to prevent new contamination from seawall-related in-water work.

L-014-062

d. Environmental Justice

Appendix J refers to fishing on Pier 65 (p. 21 & 31). Where is this?

Thank you again for the opportunity to participate in this project and comment on this Supplemental Draft Environmental Impact Statement. We look forward to continuing work with your project team to define a project that will replace the SR 99 Viaduct and the City's aging seawall.

Please do not hesitate to contact either of us—Geri Poor at 206-728-3778, or Christine Wolf at 206-728-3458, if you have any questions.

Sincerely,

Geraldine H. Poor, AICP
Manager, Regional Transportation
Economic Development
Port of Seattle

Christine Wolf
Regional Transportation Planner
Seaport
Port of Seattle

L-014-057

Responses to the Port's 2004 Draft EIS comments are included in item L-006.

L-014-058

The project is located in a Carbon Monoxide (CO) maintenance area. The Final EIS evaluated the reasonable worse case CO operational effects during construction for the prefered alternative (Bored Tunnel). The Bored Tunnel Alternative would meet the standards for criteria pollutants. Mitigation measures to address air quality effects during construction are discussed in Chapter 8 of the Final EIS.

PSCAA would regulate particulate emissions (in the form of fugitive dust, which includes but is not limited to diesel particulate matter) during construction activities. Memorandum of Agreement (MOA) has been developed between WSDOT and the Puget Sound Clean Air Agency (PSCAA) to help eliminate, confine, or reduce construction period emissions for many larger and longer term projects in Washington State. This MOA would apply to the Alaskan Way Viaduct Replacement Project. Mitigation measures are described in detail in the Final EIS Appendix M, Air Discipline Report.

L-014-059

Air quality mitigation measures have been developed to encourage the use of newer, more efficient construction equipment. The lead agencies will encourage the use of newer and more fuel-efficient equipment, when feasible.

L-014-060

Please note that the portion of the project area referred to in this comment is now part of the S. Holgate Street to S. King Street Viaduct Replacement Project. Effects on T-46 and mitigation measures are

Port of Seattle

September 22, 2006

Mr. Douglas B. MacDonald
Secretary of Transportation
State of Washington
Transportation Building
PO Box 47316
Olympia, WA 98504-7316

The Honorable Greg Nickels
Mayor
City of Seattle
Seattle City Hall
600 Fourth Avenue, 7th Floor
Seattle, WA 98104-1876

Re: Port of Seattle—Viaduct/Seawall Replacement SDEIS Comments

Dear Secretary MacDonald and Mayor Nickels:

L-014-063

Thank you for the opportunity to comment on the *Supplemental Draft Environmental Impact Statement for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project*. This project is vital to the Port's and the region's future. We appreciate the progress that has been made since we submitted our comments to the DEIS two years ago:

- We fully support the decision to carry forward only the alternatives that retain the existing capacity of the corridor. The region, and the state, cannot afford the congestion and related economic impact of the 40-50% reduction in capacity that a surface alternative would create.

- We appreciate that both remaining alternatives now retain the Elliott/Western ramps, unlike the DEIS. They are essential for moving freight between the city's two manufacturing-industrial centers. They also provide access from the viaduct to a proposed cruise terminal at Terminal 91.

We will continue to work with the project team to develop a final design and construction management approach that meets the freight needs for both the region and our cargo. This includes:

- The design and construction staging/lay-down concepts for the south end of the project, as described in the SDEIS, would require a significant land take on Terminal 46 and, potentially, Terminal 25/30. T-46 operates on very constrained footprint, and the redevelopment of T-25/30 to its former use as a container terminal (by 2008) also relies on use of its entire footprint. The SDEIS design would require all trucks serving

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discussed in the Environmental Assessment for that project.

Construction noise levels would meet the City of Seattle noise ordinance for industrial zone properties, such as Terminal 46. The lead agencies developed noise and vibration mitigation measures for this project. To reduce construction noise at nearby receptors, mitigation measures such as those discussed in Chapter 8 of the Final EIS and in Appendix F, Noise Discipline Report, would be incorporated into construction plans, contractor specifications, and variance requirements.

WSDOT will work closely with the Port to resolve any issues with the security cameras.

L-014-061

FHWA, WSDOT and the City of Seattle appreciate the Port of Seattle's comments regarding in-water work near the Pier 66 marina. WSDOT will coordinate with Port staff regarding work in the vicinity of Port-owned properties for the Cut-and-Cover and Elevated Structure Alternatives. No in-water work is proposed as part of the preferred Bored Tunnel Alternative. Specific reference to the listed Port properties was eliminated for the Final EIS as potential mitigation sites. Coordination will continued between WSDOT, the Port, and other entities for developing appropriate mitigation for improving the marine habitat of Elliott Bay. The City of Seattle is leading redevelopment efforts and associated environmental reviews processes for the central waterfront, which would take place under NEPA and / or SEPA as appropriate. In addition, the project compliments a number of other projects with independent utility that would provide other improvements such as the seawall replacement, transit enhancements, and a new Alaskan Way Promenade and public space. These individual projects include the moving forward projects identified in 2007, as well as improvements recommended as part of the Partnership Process. Please refer to Chapter 2, Alternatives Development, of the Final EIS for a description of these projects.

L-014-063

the North SIG rail yard from the waterfront to use an elevated structure. Construction staging and lay-down areas, while as yet unidentified, could have a significant impact on container drayage and terminal operations. We appreciate the project team's efforts to date to address our concerns with a new, improved design developed since the SDEIS was closed to new information. However, final design and construction must maintain the functionality and capacity of both our container terminals and drayage routes.

- The SDEIS proposes partially lowering Aurora from the Battery Street Tunnel to Republican Street, in conjunction with a design for a widened, two-way Mercer Street. The design and construction sequencing of these new components must provide for a viable truck corridor between Terminal 91 and I-5.

In addition to proposing design changes, a second reason for publishing a Supplemental DEIS was to provide information on new options for construction planning. However, while the document does outline three different construction scenarios, it does not address major construction-related issues that are of critical importance to the Port, the waterfront, and the region as a whole:

- The traffic analysis presented in the document shows the impact of losing the street and highway corridor. It does not address impacts to rail capacity. It provides only minimal information on what will happen under different construction scenarios, stages, and/or methods. It also does not give information on the impact of any potential traffic mitigation strategies. This applies to the impacts on a parcel-by-parcel basis along the waterfront, the impact on the corridor itself, and the impact on the region as a whole. The document begins to outline traffic mitigation strategies, but does not contain any information on their impact.

- The SDEIS also does not evaluate the economic impact of different construction scenarios, stages, and/or methods. This includes the impact of prolonged lack of access to waterfront businesses. As the largest property owner in the project area, we are concerned about impacts to our terminals, piers and other facilities. For example, we cannot see how our cruise terminal at Pier 66 and operations at Pier 69 can function with the Broad St. Detour in place. Nor does the SDEIS address the economic impact of project-related congestion lasting for several years on the region as a whole. The SDEIS also does not contain mitigation strategies that could be employed to buffer these impacts, nor does it identify the costs of such measures.

Understanding the traffic and economic impacts, and the cost and impact of any mitigation strategies, is critical. We cannot understand or support any construction plan without that information. The Port must understand the impacts of the project on its facilities and tenants and the business operations, and the cost and impact of applicable mitigation strategies, to then support the project and be able to participate in its funding.

L-014-062

The text should have referred to fishing on Pier 66. This has been updated in the Final EIS.

L-014-063

As you noted, the letter to Ms. Stenberg repeats and expands upon the points made in this letter to Secretary MacDonald and Mayor Nickels. Please refer to the responses provided above.

L-014-063

The limited information that is currently available indicates that economic impact and mitigation costs to the Port and its tenants could comprise a substantial portion of any Port financial participation in the project.

In addition to introducing changes to design and construction plans, the SDEIS also proposes using available and projected funds to construct a "core project"; project components not contained in that core would be built at a later, as yet unspecified time. The northern portion of the seawall is no longer included in the core project. Yet its failure, and related failures of the mainline rail and Alaskan Way surface, would have severe impacts on the Port and the economy of the region. We cannot lose sight of this critical infrastructure. The City must develop a specific funding and implementation plan for the entire seawall that ensures it will be replaced within a reasonable timeframe.

However that being said, we would like to echo both the Governor's, and the Expert Panel's, comments that it is time to make a decision and move forward with the project, with these issues resolved. The risk, both financial and safety, of not doing so is too great.

Thank you again for the opportunity to participate in this project and comment on this Supplemental Draft Environmental Impact Statement. We are also sending a more detailed, technical set of comments to WSDOT's SEPA Responsible Official, Kate Stenberg. We look forward to continuing work with your project team to define and fund a project that will replace the SR 99 Viaduct and the City's aging seawall.

Sincerely,

Lloyd Hara
Vice President
Port of Seattle Commission

Cc: Kate Stenberg, Alaskan Way Viaduct Environmental Manager, WSDOT
Port of Seattle Commission
Mic Dinsmore, Chief Executive Officer, Port of Seattle