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September 22, 2006

Kate Stenberg
Washington State Department of Transportation
Environmental Manager
Alaskan Way Viaduct and Seawall Replacement Project
999 Third Ave, Suite 2424
Seattle, WA 98104

Dear Ms. Stenberg:

King County Department of Natural Resources and Parks (DNRP) appreciates the opportunity to comment on the Alaskan Way Viaduct and Seawall Replacement Supplemental Draft Environmental Impact Statement (EIS).

L-015-001 The original Draft EIS described stormwater management options which included a convey-and-treat approach. King County DNRP strongly objected to that approach. In our attached letter dated June 1, 2004, we described the adverse impacts it would have on our wastewater management system and the environment, as well as the regulations prohibiting the approach. While King County staff have been informed in project meetings that the convey-and-treat approach will not be carried forward into the Final EIS, we want to reiterate our objections to it, and endorse again the Best Management Practices approach as a viable and better alternative.

The Supplemental Draft EIS addresses proposed changes to the project that have occurred since the Draft EIS. The following are a few of our comments on the new elements—in particular, comments related to the relocation of the Whatcom rail yard, utility relocations, and coordination on dewatering and stormwater management in the Aurora Avenue area of the project:

L-015-002 1. Impacts to King County pipelines and facilities are not identified under the alternative involving relocation of the Whatcom rail yard to east of SR 99. We would like to see any impacts addressed in the Supplemental Final EIS as we have many critical pipelines and shallow pipes in the area that may need additional protection from the rail traffic.

L-015-001

Your objections to the convey and treat approach are acknowledged, and the approach is not being carried forward in the Final EIS. Please see L-005 for the responses to your 2004 Draft EIS comment letter.

L-015-002

The project area that contains the Whatcom Railyard is now covered under a separate project--S. Holgate Street to S. King Street Viaduct Replacement Project. Please refer to that project's Environmental Assessment and Finding of No Significant Impact (FONSI) for details about project effects.

L-015-003

2. *Appendix S, Water Resources, Exhibit S.3.1*

This exhibit shows significantly greater impervious area in the Denny, Broad and Dexter Basins, which are connected to the combined system, than was shown in the Draft EIS – from a total of 21.3 to 27.9 acres. A King County combined sewer overflow (CSO), the Dexter CSO, is connected to these basins. It was to be controlled by the Mercer Tunnel, which was part of the recently completed (May 2005) Denny Way/Lake Union CSO Control Project. The Mercer Tunnel also controls the City of Seattle's East Lake Union CSOs and King County's Denny Way CSO. Any increased stormwater in this area may adversely affect the flow balance of this tunnel and the control status of these CSOs in violation of state and federal regulations. The Viaduct project will need to coordinate with King County to identify detention needed to avoid this.

L-015-004

3. *Section 6.1.1, Dewatering*

It is stated that dewatering for construction of the lowered Aurora Avenue project element in the Denny Way/Broad Street Area may be discharged to Lake Union with treatment or discharged to the combined sewer. King County prefers discharge to Lake Union due to the capacity issues around the new Mercer Tunnel, described above.

L-015-005

4. *Appendix K, Relocations, Page 18, Tunnel (preferred)*

The text mentions potential displacement of a Metro utility structure near the western end of South Lander Street. King County has not been made aware of this in our relocation discussions with the project team. Additional information should be provided to King County so we can determine impacts.

L-015-006

King County DNRP would like the opportunity to work with the Alaskan Way Viaduct team to provide information on design and operation of King County's wastewater facilities, as well as technical studies of the effects of wastewater and stormwater discharges on water quality and sediments in Elliott Bay.

If you have additional questions please contact Karen Huber, CSO Program Manager, in the Planning and Compliance Section of the Wastewater Treatment Division of the Department of Natural Resources and Parks at 206-684-1246.

Sincerely,



Pam Bissonnette
Director

Enclosure

cc: Ron Paananen, Alaskan Way Viaduct Project Director, Washington State Department of Transportation
Karen Huber, CSO Program Manager, Planning and Compliance Section, Wastewater Treatment Division, Department of Natural Resources and Parks

L-015-003

A detailed land use analysis has been performed for the Final EIS that accurately calculates existing and proposed impervious surfaces within the project limits for each alternative. To the extent possible, stormwater will be managed so that sub-basin boundaries and receiving waters will not change.

L-015-004

Please see Appendix P, Earth Discipline Report; significant dewatering is no longer expected in the North End. Dewatering methods, treatment, and disposal will be determined in the permitting and design phase of the project. We appreciate your comments regarding dewatering treatment options in the north project area. Your preference for discharge of dewatering water to Lake Union will be considered.

L-015-005

The build alternatives would not affect the Metro utility structure near the western end of South Lander Street. Since 2006, the lead agencies have selected the Bored Tunnel Alternative as the preferred alternative. Please refer to Appendix K, Public Services and Utilities Discipline Report, for an updated discussion of potential impacts. Specific impacts and mitigation are being discussed during ongoing coordination between the lead agencies and the utility providers, including King County.

L-015-006

Thank you. King County staff have provided valuable information throughout the project's planning and environmental evaluation.