BINMIC

Ballard Interbay North
Manufacturing Industrial Center
2305 NW Market Street - Seattle, WA 98107

September 22, 2006

Ms. Kate Stenberg
Alaskan Way Viaduct and Seawall Replacement Project
999 Third Avenue, Suite 2424
Seattle, WA 98104

Re: Alaskan Way Viaduct and Seawall Project - Supplemental Draft EIS

Dear Ms. Stenberg:

The Ballard Interbay Northend Manufacturing Industrial Center (BINMIC) appreciates the opportunity to comment on the Supplemental Draft EIS (SDEIS) for the Alaskan Way Viaduct Seawall Project.

C-054-001 Shutting down of SR-99 for a period of years with the resultant increased cost of shipping will have much greater impacts on Seattle's industrial and manufacturing businesses than the SDEIS has acknowledged. The impacts of the Alternatives considered in the SDEIS cannot be mitigated.

C-054-002 The SDEIS fails to adequately acknowledge the interdependence of Seattle's two Manufacturing and Industrial Areas, i.e., the Duwamish and the BINMIC areas, and the extent to which they are dependent on daily shipping of parts between these two areas.

C-054-003 The SDEIS does not adequately address the likelihood of the City and perhaps the State losing manufacturing and industrial businesses, and the family wage jobs they provide.

C-054-004 Direct construction impacts on BINMIC businesses and residents are not adequately discussed for either alternative. These impacts include freight movement, business trips, commute trips, airport trips, and medical trips. The direct impacts on those trips that currently use SR-99 are not mitigatable.

C-054-005 Indirect construction impacts on BINMIC businesses and residents are not adequately discussed for either alternative. The closing of SR99 and the Alaskan Way surface street will cause congestion

C-054-001

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the other two alternatives. Extended closure of SR 99 would be more disruptive to Seattle and the Puget Sound region. Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS provide a more in-depth comparison of trade-offs for the three alternatives.

C-054-002

A detailed discussion of freight generators, freight corridors, and impacts to freight is included in the Final EIS Appendix C, Transportation Discipline Report.

C-054-003

The build alternatives would result in enhanced mobility to activity centers in both the south and north portal areas and beyond, particularly to the SODO commercial and business district and the stadium area. Overall, the infrastructure improvements in the north portal area would improve truck freight mobility and vehicle and pedestrian connections. In turn, these benefits would improve business efficiencies due to the increased circulation near the project area. The build alternatives would contribute to local and regional mobility by providing drivers with an alternative to I-5 and Seattle's surface streets. The benefits of the Elevated Structure Alternative would not be as substantial as those described for the Cut-and-Cover Tunnel Alternative and Bored Tunnel Alternative. A more in-depth discussion of economic effects is provided in Appendix L, Economics Discipline Report. A more in-depth discussion of mobility, including freight, is provided in Appendix C, Transportation Discipline Report.

C-054-005 throughout the region. Of particular concern will be the expected 10-14 hours of delay on I-5. These indirect construction impacts are not mitigatable.

C-054-006 Increased greenhouse gases and other pollution from construction gridlock and detours are not adequately discussed for either alternative. No reasonable alternative routes have been provided. Idling traffic and gridlock will produce more greenhouse gases than without these construction delays. These impacts are not mitigatable.

C-054-007 The SDEIS does not adequately discuss the economic impacts from the delays caused by the direct and indirect construction impacts of either alternative. The job losses in the BINMIC could be significant as the raising cost of finding employees could be prohibitive, cost of shipments increase, businesses leaving to areas without delays, etc. These temporary and permanent impacts are not mitigatable.

C-054-008 Traffic impact from 7% grade in tunnel. The impacts of a 7% grade in the tunnel were not adequately discussed. It will impact the movement of traffic north on SR-99, particularly truck traffic. These impacts are not mitigatable.

C-054-009 The EIS does not discuss adequately discuss the impact to flammable and hazardous materials transport, during and after construction for either of the alternatives. The impacts could force BINMIC businesses to close. There impacts are not mitigatable.

C-054-010 Monorail Impacts-for the draft EIS the proposed monorail was discussed in the Draft EIS. The Supplemental EIS does not discuss the impacts of removing the monorail from this analysis.

C-054-011 In summation, we find there are many issues where mitigation has not been adequately addressed and it is our understanding that there are no mitigation funds available for businesses that could be adversely impacted by the construction. More analysis must be made of the adverse impacts to operating businesses from construction and the mitigation actions needed to keep them operating.

Thank you.

Regards,

John R. Kane
Chair – BINMIC Committee

C-054-004

Further analysis of the traffic impacts during construction has been conducted and is presented in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report. The chapter provides a number of transportation metrics such as travel time for various routes, intersection operations, SR 99 mainline operations, and system-wide performance measures for each alternative. Also included in the chapter are discussions of the construction effects of each alternative on trucking and freight traffic.

C-054-005

The Final EIS Appendix C, Transportation Discipline Report, addresses impacts on regional facilities, such as I-5 and major east-west corridors used by the freight community, in more detail.

C-054-006

Mitigation measures, presented in Chapter 8 and Appendix C (Transportation Discipline Report) of the Final EIS will be followed to minimize disruptions such as detours and traffic congestion during the project's construction phase. Estimates for the potential direct emissions of greenhouse gases under the build alternatives are provided in the Final EIS and Appendix R, Energy Discipline Report. Potential air quality impacts during the construction period have been estimated and are discussed in Appendix M, Air Discipline Report.

C-054-007

The build alternatives would result in enhanced mobility to activity centers in both the south and north portal areas and beyond, particularly to the SODO commercial and business district and the stadium area. Overall, the infrastructure improvements in the north portal area would improve truck freight mobility and vehicle and pedestrian connections. In turn, these benefits would improve business efficiencies due to the

increased circulation near the project area. The build alternatives would contribute to local and regional mobility by providing drivers with an alternative to I-5 and Seattle's surface streets. The benefits of the Elevated Structure Alternative would not be as substantial as those described for the Cut-and-Cover Tunnel Alternative and Bored Tunnel Alternative.

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the other two alternatives. Extended closure of SR 99 would be more disruptive to Seattle and the Puget Sound region. Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS provide a more in-depth comparison of trade-offs for the three alternatives.

A more in-depth discussion of economic effects is provided in Appendix L, Economics Discipline Report. A more in-depth discussion of mobility, including freight, is provided in Appendix C, Transportation Discipline Report.

C-054-008

The Bored Tunnel grades would not exceed 4 percent and should have only a marginal effect on truck speeds. The Cut-and-Cover Tunnel south of Battery Street Tunnel south portal would have grades of 6.5 percent (steepest grade), but this section is about 800 feet long.

C-054-009

The Final EIS notes that hazardous and flammable cargo would be prohibited in the bored tunnel all day. Currently, hazardous/flammable materials can be transported on downtown city streets without restriction,

as long as the trucks do not exceed 30 feet in length. Vehicles exceeding 30 feet in length carrying hazardous or flammable materials wishing to travel through downtown Seattle will continue to use I-5 or Alaskan Way. This practice is not expected to change as a result of the Alaskan Way Viaduct Replacement Project construction activities.

C-054-010

The Seattle Monorail Project's Green Line is no longer being considered for implementation, and therefore cannot be assumed as a mitigation strategy to either complement or replace the project. However, other high-capacity transit developments that are currently being planned or implemented (e.g., RapidRide, Link Light Rail) would address many of the trips that are made on a daily basis through the Alaskan Way Viaduct corridor. The transportation analysis described in the Supplemental Draft EIS and Final EIS (including Appendix C, Transportation Discipline Report) was conducted assuming this changed condition.

C-054-011

Mitigation measures have been developed and are included in Chapter 8 of the Final EIS. Funds for implementing the mitigation plan are included in the project budget.