PUGET SOUND ENERGY

September 21, 2006

Kate Stenberg
WSDOT, Environmental Manager
Alaskan Way Viaduct and Seawall Replacement Project
999 Third Ave, Suite 2424
Seattle, WA 98104
awvsdeiscomments@wsdot.wa.gov

Re: Comments Alaskan Way Viaduct and Seawall Replacement Project Supplemental Draft Environmental Impact Statement

Dear Ms. Stenberg:

Puget Sound Energy (PSE) is the largest energy supplier (natural gas and electricity) in the State of Washington. We provide natural gas services to approximately 115,000 customers within the City of Seattle.

Puget Sound Energy is among many utilities that have facilities on, under, or near the Viaduct and Seawall. In addition to the Viaduct's role as a major, regional transportation thoroughfare, the Viaduct corridor also acts as a major "utilidor" for many utilities (including water, sewer, steam, natural gas, telecommunications, fiber optic cables, and electricity).

Puget Sound Energy has natural gas mains, services and a supply line located through, and under the current Viaduct footings directly proximate to the Viaduct. A 12" diameter natural gas supply pipeline serves PSE customers throughout Seattle and in other parts of King and Snohomish counties. Based upon the work we have done since 2004 assessing the replacement options, the following comments are intended to augment those we submitted for the DEIS in 2004.

B-020-001

1. PSE recommends the use of a master permit system to jointly permit all utilities so any potential permitting issues do not delay the overall project schedule. The FEIS should include preparation of a master utility relocation plan.

B-020-002

2. Projects of regional significance need to address all project impacts. Utility relocation costs are a construction impact for both public and private utilities and should be included in the estimated project cost.

B-020-003

3. Project work sequence, schedule and construction methods should be considered and designed to avoid more than one relocation of existing utilities. In order to provide safe, immediate, reliable service to our customers, PSE strongly recommends a utility relocation plan that accommodates one relocation of PSE's facilities when necessary for the transportation project.

B-020-004

4. PSE facilities need to be properly supported and protected during construction. To prevent impacts to utilities and as a mitigation measure, PSE should be included in the construction planning process, especially to determine the need to have a representative on site when work occurs near our facilities.

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B-020-001

The project team has undertaken a coordinated permitting effort to ensure project permits and approvals are obtained in a timely manner. This includes:

- Working closely with the utility and design groups to ensure that appropriate permits are received during the life of the project
- Incorporating permitting in the project base schedule
- Working closely with the project schedulers to ensure permits are obtained in advance of all utility and construction work
- Holding early pre-application meetings with permitting agencies allowing early review of design plans and environmental documents
- Tracking permit requirements, permits and permit commitments in a project-wide database

B-020-002

Potential utility relocations are discussed in Chapter 6 of the Final EIS Appendix K, Public Services and Utilities Discipline Report.

Although costs are an important part of project planning and decision-making, they are not part of the NEPA environmental review process. However, overall project costs, which includes costs associated with utility relocation, are discussed in the overall project description and are certainly part of the lead agency decision making considerations. Costs of relocating private utilities located in public rights-of-way are generally borne by the utility and are not included in the project costs paid for with public monies.

B-020-003

The project's proposed construction sequencing, schedule, and construction methods for the alternatives are discussed in the Final EIS Appendix B, Alternatives Description and Construction Methods

B-020-005

5. PSE will need to perform normal utility maintenance activities on its facilities before, during and after any required pipeline relocations that should be considered when determining final location of facilities.

B-020-006

6. As a result of this project, PSE may need to relocate and restore services on private property associated with this work. Any final utility plan should reflect this issue.

B-020-007

7. PSE plans to install a 16" diameter high-pressure (HP) gas main during the utility relocation. PSE would prefer that all of the 16" HP gas main be installed before transferring service from and deactivating the existing 12" HP gas main. PSE would prefer to be able to mobilize and demobilize only one time during the placement of the relocated HP main.

B-020-008

8. PSE would like to address plans for connecting customers on the east and west side of the tunnel alignment. PSE would request that before the roadway is in its permanent state, PSE will be able to install customer connections.

B-020-009

9. PSE gas piping would need to be supported and protected in place across excavation areas. PSE concerns for the crossings include: duration of pipe exposure, length of crossing/span, potential degradation of pipe coatings, design of crossings, differential settlement and PSE monitoring requirements.

B-020-010

10. Impressed current corrosion protection of the seawall could require significant power. PSE would like to continue to be part of a coordinated corrosion protection plan for the project. Coordination among all parties will be necessary to design and build efficient corrosion protection systems. At utility crossings, PSE recommends including a common cathodic protection test station with leads to both utilities.

B-020-011

11. PSE prefers not to work in joint trenches because of the different production rates of steel and plastic pipe due to the different welding/pipe fusion disciplines. PSE considers pipeline bedding, backfill and compaction important and will want to be involved in the inspection of this work for their facilities.

B-020-012

12. PSE requests that the Intermediate Pressure (IP) gas main be located with consideration of best serving PSE customers.

B-020-013

13. PSE continues to remain concerned about trenching methods. PSE does not favor the use of trenchless methods in this corridor because of concerns surrounding the guidance system interference caused by other utilities and buried obstructions.

B-020-014

14. It is critical that representatives of Puget Sound Energy be included in the development and execution of any coordinated communication plan with the community, our customers and other stakeholders. This includes review of media releases that reference Puget Sound Energy work and meetings, and other interactions, with impacted businesses, residents, government agencies and the public.

Thank you for the opportunity to comment on the proposed Alaskan Way Viaduct and Seawall Replacement Project Supplemental DEIS. If you have any questions concerning these comments, please contact me at 425-456-2838 or susan.hempstead@pse.com.

Sincerely,

Susan Hempstead
Local Government & Community Relations Manager
PUGET SOUND ENERGY

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Discipline Report. The development of the utility plans has occurred with input resulting from ongoing coordination with both the private and public utility providers to reduce the number of utility relocations to the extent possible.

B-020-004

The utility design has been developed with extensive coordination between the utility providers and the utility engineers. PSE has participated in this coordination. It is anticipated that such coordination will continue in future design phases as the utility designs are finalized. The need to have a PSE representative on site during construction will be determined during future design phases and reflected in project specifications as appropriate.

B-020-005

PSE, along with other affected private utility providers, has been and will continue to be included in meetings and other direct communications related to the utility relocation planning. The project utility design team is well aware of the critical need to maintain access to utility lines for continued operation and maintenance. These needs will be reflected in the design of the final utility locations.

B-020-006

The project design team will complete the design for private utilities to approximately a 30 percent design level. The design will then be handed off to the private utility for final design. Private utilities will each procure their own private property easements or franchise rights as needed.

B-020-007

A single mobilization and demobilization is preferred by all parties and will be reflected in the preliminary (approximately 30 percent) utility design plans. Private utilities will be responsible for final design.

B-020-008

There are utilities in addition to PSE that will need to be connected to customers before the roadway corridor is in its final state. The project will develop preliminary design plans to approximately the 30 percent level. The final design, including the sequencing of customer connections, is to be addressed by the private utilities.

B-020-009

The details for the support and protection of utilities that are temporarily exposed during roadway excavation can be addressed by PSE and other private utilities as they develop their own final design, following the project's completion of the 30 percent design phase. The lead agencies will continue to coordinate with PSE and other utility providers on issues such at this one.

B-020-010

Your concern is noted. Details for cathodic protection of utilities will continue to be developed in coordination with PSE and other utilities as design proceeds. Please note that the preferred Bored Tunnel Alternative does not include replacement of the seawall. However, the Cut-and-Cover Tunnel and Elevated Structure Alternatives do include replacement of the seawall.

B-020-011

PSE's concerns and preferences are noted. Coordination on design and contracting between PSE and the project will continue as the utility design proceeds.

B-020-012

The location of the Intermediate Pressure (IP) gas main will be determined as the design progresses, and will be coordinated with PSE.

B-020-013

PSE's concern is noted. Based on coordination between PSE and the project team, it is the project's understanding that horizontal directional drilling for other utilities under PSE gas mains can be addressed by having a well-defined entry point for the drill and that the entry point is a few feet back from PSE gas mains.

B-020-014

The project's communications team will ensure that PSE will have the opportunity to review any media releases or public notifications related to PSE work prior to public release.