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Seattle Marine Business Coalition
2201 West Commodore Way
Seattle, WA 98199

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:

C-057-001 The Seattle Marine Business Coalition appreciates the opportunity to comment on the Supplemental Draft EIS for the Alaskan Way Viaduct Seawall Project. It is our understanding that the SDEIS considered a No Build Alternative and only two Build options: a Tunnel and a new Elevated Structure. We respectfully suggest that the Build Alternatives which were considered in the SDEIS will have effects during the construction period that cannot be adequately mitigated. The cost of the two Build Alternatives which were considered would be so great as to frustrate the fundamental purpose of the Project of maintaining a sustainable local and regional economy. The SDEIS has failed to adequately address this critical issue.

C-057-002 As a city and state which are dependent on trade and the shipment of goods, the No-Build Alternative is not a solution. We respectfully suggest that under the circumstances other Build alternatives, notably the Retrofit option, deserve much greater consideration.

C-057-003 Shutting down of SR-99 for a period of years with the resulting increased cost of shipping will have much greater and more disastrous impacts on Seattle's industrial and manufacturing businesses than the SDEIS has acknowledged. The impacts of the Alternatives considered in the SDEIS cannot be adequately mitigated. The SDEIS fails to adequately acknowledge the interdependence of Seattle's two Manufacturing and Industrial Areas, i.e., the Duwamish and the Ballard Interbay Northend Manufacturing Industrial Center, and the extent to which they are dependent on daily shipping of parts between these two areas. Washington State's B &O tax structure forces most of these businesses to avoid accumulating inventory, with the consequence that Washington manufacturing and industrial businesses need to rely on having truck drivers pick up and deliver parts as they are needed . Employers must pay truck drivers by the hour, so delays caused by shutting down of SR 99 will have a direct and disastrous impact on their bottom line.

C-057-004

C-057-005

C-057-001

The lead agencies are well aware of the potential effects on local businesses during construction. The construction transportation mitigation measures described in the Final EIS and Appendix C, Transportation Discipline Report, include many actions and programs to reduce construction impacts and support the local economy. Many of these ideas were presented in general in the 2006 Supplemental Draft EIS and since have been developed in greater detail.

C-057-002

The lead agencies recognize that retrofitting highways, roadways, and bridges is often a viable option to counter earthquake threats. However, unlike other bridges and structures in the area, it isn't practical to retrofit the viaduct by only strengthening one or two structural elements. Fundamentally, such fixes transfer the forces from one weak point in the structure to another, and the viaduct is weak in too many places. The concrete frames, columns, foundations, and even the soil under the structure don't provide enough strength by today's standards. The lead agencies have studied various retrofitting concepts, and all of these concepts fail to provide a cost-effective, long-term solution that adequately addresses the risks to public safety and the weakened state of the viaduct. The lead agencies also determined that retrofitting 20 percent of the viaduct as discussed for the Rebuild Alternative is not reasonable.

C-057-003

If the preferred Bored Tunnel Alternative is selected, closure of the viaduct would be for a short duration (several weeks) during construction. This is one main benefit of this alternative. Probable significant adverse construction impacts are not expected for either the Port of Seattle or the Ballard/Interbay industrial areas with the exception of a decrease in freight mobility/increase in congestion for truck traffic as they use alternative freight routes. The loss of freight mobility will have a

C-057-006 Missing from the SDEIS is acknowledgement of the likelihood of the City and perhaps the State losing these manufacturing and industrial businesses, and the family wage jobs they provide. The pertinent statute requires assessment of the proposed project on racial and ethnic minorities many of whom are currently employed by the industries which will suffer severe negative impacts from the proposed Tunnel or new Elevated Structure and the concomitant lengthy shutdown of SR 99. In other words, the SDEIS fails to meet the statutory requirement for adequate assessment of the Project's impacts and is in that regard fatally flawed.

C-057-007 Similarly there has not been an adequate assessment of the resulting impacts on the Ballard, Interbay, and Northend businesses which support and depend on Seattle's industries and freight movement.

C-057-008 The SDEIS also failed to adequately consider the disastrous Construction Impacts on Seattle's marine businesses along the Central Waterfront. The likely damage to them would be irreparable. For example, it is questionable whether Argosy Cruises would be able to survive.

C-057-009 The proposed Tunnel would have a 7% grade. The 7 % grade in the proposed tunnel configuration will reduce drivers' line of sight resulting in a slowing of freight movement and creating congestion. The traffic impacts of these characteristics of the proposed tunnel have not been adequately assessed.

C-057-010 The SDEIS does not adequately assess the impacts of the restrictions the Tunnel Alternative would have on the transport of combustible and hazardous material. Those restrictions would injure key Ballard businesses and the Seattle based fishing industry they serve.

C-057-011 The Draft EIS issued in 2004 was premised on the construction of a Monorail between Ballard and West Seattle. The monorail was presented as a form of mitigation to some of the traffic impacts. Now it is clear that a Monorail will not be built. The SDEIS fails to adequately assess the impacts of the Projects under these new circumstances.

C-057-012 It is our understanding that there are other elevated alternatives that would be much less costly and have substantially fewer negative impacts. The Seattle Marine Business Coalition will welcome the opportunity to be a resource for exploring and developing these better alternatives. In particular we request more consideration of the Retro-fit Option. A Retro-fit can be accomplished at a greatly reduced cost. In 30 to 50 years, when the Retro-fit will have lived its useful life, global warming and the necessary curtailment of CO_2 emissions will have drastically changed traffic patterns. A new and appropriate solution can be built at that time.

C-057-013 The cost of the two Build alternatives which were considered in the SDEIS would be so great as to frustrate the fundamental purpose of the Project of creating a sustainable local and regional economy. Especially in light of the newly revised cost estimates the other Build Alternatives, notably including the Retro-fit Option deserve much more serious consideration.

resultant loss in productivity, which is discussed in Appendix L, Economics Discipline Report, of the Final EIS as a cost of congestion.

C-057-004

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

C-057-005

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.

C-057-014 We feel strongly that the SDEIS is severely flawed, and that the flaws are leading to decisions which will be disastrous to City of Seattle and the State of Washington. This being sad, we look forward to working with City and State staff as they continue to work toward the goal of improving or maintaining freight mobility and simultaneously sustaining Seattle's economy.

Respectfully,

Peter Philips
President

Lise Kenworthy
Immediate Past President

SMBC/Alaskan Way Viaduct SDEIS Comment 92206

3

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-057-006

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Environmental documentation for the project has been prepared in compliance with the National Environmental Policy Act (NEPA) (42 USC 4322(2)(c)) and the State Environmental Policy Act (SEPA) (Ch. 43.21 C

RCW). The potential effects on low income and minority populations are discussed in Environmental Justice section of the Final EIS Appendix H, Social Discipline Report. A more in-depth discussion of economic effects is provided in Appendix L, Economics Discipline Report.

C-057-007

Discussions related to economic impacts are included in the Final EIS and in Appendix L, Economics Discipline Report.

C-057-008

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.

C-057-009

Heavy vehicles constitute approximately 6 percent of the Average Daily Traffic (ADT) volume in the northbound direction. The Bored Tunnel grades do not exceed 4 percent and would have only a marginal effect on truck speeds. The Cut-and-Cover Tunnel Alternative south of the Battery Street Tunnel south portal would have grades of 6.5 percent (steepest grade), but this section is only about 800 feet in distance.

C-057-010

At this time, transporting hazardous materials in the Battery Street Tunnel is prohibited. The Final EIS notes that hazardous and flammable cargo would be prohibited in the Bored Tunnel and Cut-and-Cover

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 would continue to use I-5 or Alaskan Way. This practice is not expected to change as a result of Alaskan Way Viaduct Replacement Project construction activities.

C-057-011

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 have occurred since the 2006 Supplemental Draft EIS was published. The most important of these is the voter approval of Metro's Transit Now initiative, which provides additional bus transit services in the same corridors served by the original Green Line. This service, called RapidRide, provides faster and more reliable service, more times of the day, from West Seattle, Ballard/Interbay, and North Seattle.

The Alaskan Way Viaduct Replacement Project team will continue to work closely with King County Metro and other transit providers to support the planning and implementation of expanded transit services to enhance the mobility of travelers during project construction. More information about congestion relief strategies for construction can be found in Appendix C, Transportation Discipline Report, of the Final EIS.

C-057-012

A retrofit alternative has been suggested many times and has been carefully reviewed by WSDOT and independent organizations such as the American Society of Civil Engineers. In brief, a retrofit that approaches the design goals of the project (needed to protect public safety) cost nearly as much as a new structure and does not remedy

other serious deficiencies such as narrow lanes and shoulders. Expecting global warming or other issues to eliminate the need for this critical transportation facility is speculative and not responsible planning.

C-057-013

The cost estimates and funding for the project have continued to be defined and are further described in Chapter 2 of the Final EIS.

C-057-014

FHWA, WSDOT, and the City of Seattle have conducted an extensive level of design and analysis, as shown in the Final EIS. The project team is committed to working with organizations such as yours to make the Alaskan Way Viaduct Replacement Project successful.