

North Seattle Industrial Association  
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September 21, 2006

Kate Stenberg  
WSDOT, Environmental Manager  
Alaskan Way Viaduct and Seawall Replacement Project  
999 Third Ave, Suite 2424  
Seattle, WA 98104

Dear Ms. Stenberg:

The North Seattle Industrial Association has reviewed the Alaska Way Viaduct Replacement DEIS and SEIS and has found deficiencies in the analysis. We request that these deficiencies be addressed in the FEIS.

We believe that the DEIS and SEIS are remiss in addressing the following areas:

- C-047-001** | 1. Direct construction impacts that are uniquely the North Seattle Industrial Association businesses are not adequately evaluated 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 discussed.
- C-047-002** | 2. Indirect construction impacts on North Seattle Industrial Association are not addressed for either alternative. The closing of SR99 and the Alaskan Way surface street will cause congestion throughout the region. No reasonable alternative routes have been provided. I-5 cannot handle more congestion. How will workers and supplies get to the North Seattle Industrial Association businesses?
- C-047-003** | 3. What are the economic impacts of traffic delays caused by construction? This is a NEPA document and economic impacts should be quantified, not discussed in generalities. The EIS does not adequately discuss the economic impacts from the travel delays caused by the direct and indirect construction impacts of either alternative. The job losses in the North Seattle Industrial Association area could be significant as the raising cost of finding employees could be prohibitive, cost of shipments increase, businesses moving to areas without delays, etc.
- C-047-004** | 4. The effect on air quality from construction gridlock and detours are not adequately discussed for either alternative.

### C-047-001

A detailed analysis of construction-related transportation effects is provided in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report. Among other things, the analysis covers travel times, intersection operations, and freight mobility for trips traveling through the project area.

### C-047-002

An updated analysis of construction-related transportation effects is provided in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report.

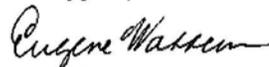
### C-047-003

Construction expenditures would occur over a number of years, directly resulting in new demand for construction materials and labor. These direct effects would lead to indirect or secondary effects, as the production of output by firms in other industries increases to supply the demand for inputs to the construction industry. Both the direct and indirect effects of construction expenditures typically cause firms in all industries to employ more workers to meet the increased demand. The increase in employment leads to induced effects because the additional wages and salaries paid to workers foster greater consumer spending. The mitigation measures for the build alternatives vary somewhat, especially when comparing the Bored Tunnel Alternative to the Cut-and-Cover Tunnel and Elevated Structure Alternatives. The mitigation measures for all the build alternatives, however, have common themes:

- Focusing on clearly defining and directing pedestrian and vehicle traffic in a systematic and streamlined manner
- Providing adequate parking for construction workers and encouraging short-term parking along the waterfront
- Distributing timely and informative project and construction updates
- Providing noise mitigation

- C-047-005** | 5. The impacts of a 7% grade associated with the tunnel option were not adequately discussed in either EIS. The 7% grade in the proposed tunnel configuration will slow the movement of traffic north on SR-99, particularly truck traffic.
- C-047-006** | 6. The EIS does not adequately discuss the impact to flammable and hazardous materials transport through the corridor, during and after construction for either of the alternatives. The impacts could force North Seattle Industrial Association businesses to close.
- C-047-007** | 7. The EIS does not adequately discuss the mitigation costs. Without these costs it is hard to evaluate the two alternatives. The added mitigation costs might cause both alternatives not to be built.
- C-047-008** | 8. The EIS is confusing on the role of the Broad Street overpass is not explained. It is hard to see how the detours outlined in the document work.
- C-047-009** | 9. The Seattle Monorail program was presented in the draft EIS as a form of mitigation to traffic impacts. The Monorail is not going to be constructed; this changed condition was not addressed in the SEIS and should be addressed in the FEIS.
- C-047-010** | 10. View Blockage. Seattle residents and visitors enjoy views of the Olympics, City and the waterfront from the current elevated structure. Under the tunnel alternative they will be removed. The EIS suggests that the removal of the elevated structure will increase the views for the general public. This reflects faulty analysis inasmuch as there are many structures blocking the views which will not be removed. Some views may be increased for inhabitants of buildings that currently exist or may be built along Western Avenue, but the number of people that would receive benefit from the demolition of the elevated structure is very small compared to the number that benefit from the views from the elevated structure on a daily basis.

Sincerely yours,



Eugene Wasserman  
President

Preserving and protecting North Seattle's unique and diverse industrial heritage  
and resources for everyone

- Preparing and assisting businesses within the project area to maintain an accessible and profitable business

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.

The specific losses that may or may not materialize for businesses outside of the area of immediate impact would be subject to economic forces beyond the control of this project and cannot be calculated without speculation.

**C-047-004**

Air quality effects during construction would occur primarily as a result of dust and emissions from construction equipment (such as bulldozers, backhoes, and cranes), diesel-fueled trucks, diesel- and gasoline-fueled generators, and other project-related vehicles such as service trucks. Potential air quality impacts during the construction period have been estimated and are discussed in Appendix M, Air Discipline Report. A more in-depth discussion of mobility, including congestion and detours,

is provided in Appendix C, Transportation Discipline Report. Please refer to the Final EIS for current information.

**C-047-005**

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 should not pose an impact to trucks traveling in the tunnel. The Cut-and-Cover Tunnel Alternative south of the south tunnel portal has grades of 6.5 percent (steepest grade), but this section is no more than 800 feet long.

**C-047-006**

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 Alternative as well. 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-047-007**

Cost estimates for the alternatives currently being evaluated include current proposed mitigation measures and a reasonable allowance for additional mitigation measures that have not yet been identified. Costs in and of themselves are not an environmental subject normally discussed in an EIS. Please refer to the Final EIS for current information.

**C-047-008**

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

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.

**C-047-009**

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 EISs and Final EIS (including Appendix C, Transportation Discipline Report) was conducted assuming this changed condition.

**C-047-010**

Many people have expressed that they enjoy the views when traveling on the viaduct. The visual character and quality of the views, as well as the likely viewer response of drivers and passengers are discussed in Final EIS Appendix D, Visual Quality Discipline Report. The analysis considers the SR 99 corridor, which is designated as a City of Seattle Scenic Route, and identifies and assesses other designated view corridors primarily along east-west streets. Views from the roadway and of the roadway are both assessed.