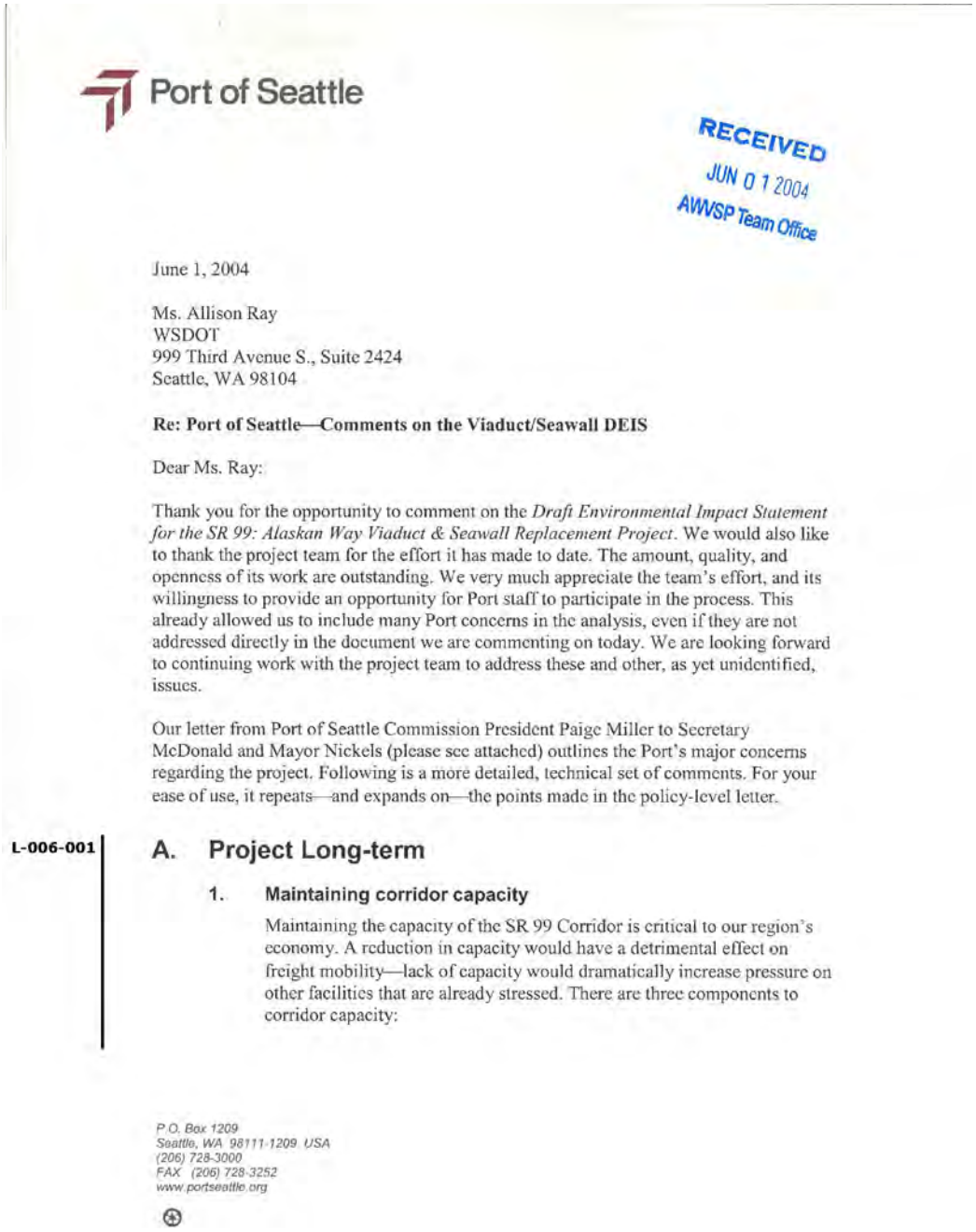

Port of Seattle

RECEIVED
JUN 01 2004
AWVSP Team Office

June 1, 2004

Ms. Allison Ray
WSDOT
999 Third Avenue S., Suite 2424
Seattle, WA 98104

Re: Port of Seattle—Comments on the Viaduct/Seawall DEIS

Dear Ms. Ray:

Thank you for the opportunity to comment on the *Draft Environmental Impact Statement for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project*. We would also like to thank the project team for the effort it has made to date. The amount, quality, and openness of its work are outstanding. We very much appreciate the team's effort, and its willingness to provide an opportunity for Port staff to participate in the process. This already allowed us to include many Port concerns in the analysis, even if they are not addressed directly in the document we are commenting on today. We are looking forward to continuing work with the project team to address these and other, as yet unidentified, issues.

Our letter from Port of Seattle Commission President Paige Miller to Secretary McDonald and Mayor Nickels (please see attached) outlines the Port's major concerns regarding the project. Following is a more detailed, technical set of comments. For your ease of use, it repeats—and expands on—the points made in the policy-level letter.

L-006-001

A. Project Long-term

1. Maintaining corridor capacity

Maintaining the capacity of the SR 99 Corridor is critical to our region's economy. A reduction in capacity would have a detrimental effect on freight mobility—lack of capacity would dramatically increase pressure on other facilities that are already stressed. There are three components to corridor capacity:

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L-006-001

Thank you for your comment expressing a preference for the 2004 Cut-and-Cover Tunnel Alternative. The project recognizes the importance of providing sufficient capacity in the SR 99 corridor and efficiently moving people and goods to and through downtown Seattle, which is expressed in the project's purpose and need statement. Because the project has evolved since 2004, please see the Final EIS and Appendix C, Transportation Discipline Report, for the current discussion of alternatives and transportation effects.

The Surface and Bypass Tunnel Alternatives have been dropped from consideration because they did not meet the project's purpose. Both alternatives would have caused substantial increases in travel times and congestion.

L-006-001

a. **Capacity on the replacement facility itself**

Maintaining capacity in the corridor is critical. We are particularly concerned about the ability of the different design alternatives to facilitate freight operations. According to the DEIS, the Surface and Bypass Tunnel alternatives do not maintain existing corridor capacity. Both Surface and Bypass Tunnel alternatives would force a dramatic increase in traffic on Alaskan Way surface, most likely without the benefit of a grade separation at Broad Street. We feel that these two alternatives are not acceptable for this reason. Although both the Aerial and Tunnel alternative maintain existing capacity, we support the six-lane tunnel alternative for the central waterfront because it better supports an economically viable waterfront and livable environment.

L-006-002

b. **Capacity on surface arterials**

The DEIS indicates that some alternatives may reduce the capacity of surface arterial streets, such as Alaskan Way surface. We urge you to ensure that these arterials, and in particular Alaskan Way surface, do not lose any capacity that supports existing uses, including general-purpose traffic, transit, freight delivery and over-legal trucks, tourist activities, ferries (both state and private), and cruise ship access.

L-006-003

c. **Capacity on the BNSF mainline**

The DEIS does not address the potential impact of a seawall failure on the ability of the BNSF mainline to carry freight and passenger trains. We are concerned about this scenario and believe it should be further analyzed. If there is a realistic chance that loss of the seawall would make the mainline unusable, contingency plans prepared in conjunction with the viaduct/seawall project should also prepare for rail freight and passenger movement in the absence of the mainline.

L-006-004

2. **Need for the Elliott/Western ramps**

The DEIS assumes that the Broad Street underpass will be built in advance of the project. We are concerned that a permanent grade separation is no longer planned, although it is still needed. The project should explore the feasibility of constructing a grade separation that would accommodate viaduct construction as well as long-term needs.

The DEIS itself further makes the need for these ramps clear when it indicates that, because BINMIC is not served directly by the regional highway system, "primary access to regional freeways and industrial areas

L-006-002

None of the alternatives proposed reduce capacity of surface arterial streets. However, in some cases, additional traffic would be shifted to surface arterials as a result of configuration changes associated with SR 99. The traffic analysis presented in the Final EIS illustrates the expected traffic conditions and volumes. With the preferred Bored Tunnel Alternative, the final configuration of Alaskan Way will be determined by the separate Central Waterfront Project led by the City of Seattle.

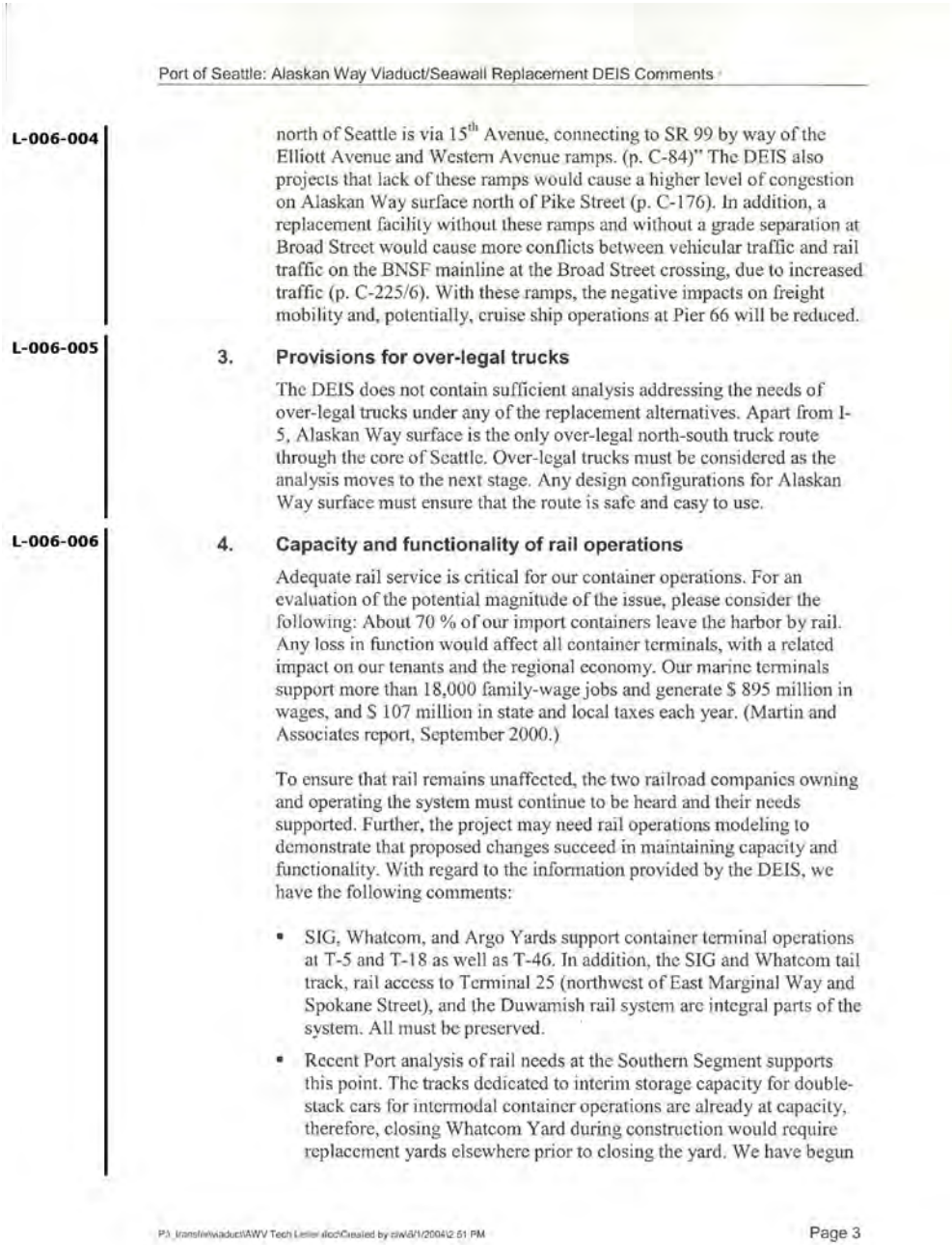
L-006-003

The EISs prepared for this project present the existing conditions in the study area and discuss the potential effects on the environment to construct and operate each proposed alternative. The EISs are not meant to present contingency plans for catastrophic events.

With the preferred Bored Tunnel Alternative, the seawall will be replaced by the Elliott Bay Seawall Project, which is a separate project led by the City of Seattle. If the Cut-and-Cover Tunnel or Elevated Structure Alternative is selected, the seawall would be replaced as part of the alternative.

L-006-004

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative. This alternative does not include ramps to Elliott and Western avenues. This transportation connector would be implemented by the City of Seattle as part of an independent project. The Elliott and Western Avenue ramps have been retained with the Elevated Structure and Cut-and-Cover Tunnel Alternatives. The alternatives have been refined since 2004, please see the Final EIS for the current configuration of each proposed build alternative.



Port of Seattle: Alaskan Way Viaduct/Seawall Replacement DEIS Comments

L-006-004

north of Seattle is via 15th Avenue, connecting to SR 99 by way of the Elliott Avenue and Western Avenue ramps. (p. C-84)" The DEIS also projects that lack of these ramps would cause a higher level of congestion on Alaskan Way surface north of Pike Street (p. C-176). In addition, a replacement facility without these ramps and without a grade separation at Broad Street would cause more conflicts between vehicular traffic and rail traffic on the BNSF mainline at the Broad Street crossing, due to increased traffic (p. C-225/6). With these ramps, the negative impacts on freight mobility and, potentially, cruise ship operations at Pier 66 will be reduced.

L-006-005

3. **Provisions for over-legal trucks**

The DEIS does not contain sufficient analysis addressing the needs of over-legal trucks under any of the replacement alternatives. Apart from I-5, Alaskan Way surface is the only over-legal north-south truck route through the core of Seattle. Over-legal trucks must be considered as the analysis moves to the next stage. Any design configurations for Alaskan Way surface must ensure that the route is safe and easy to use.

L-006-006

4. **Capacity and functionality of rail operations**

Adequate rail service is critical for our container operations. For an evaluation of the potential magnitude of the issue, please consider the following: About 70 % of our import containers leave the harbor by rail. Any loss in function would affect all container terminals, with a related impact on our tenants and the regional economy. Our marine terminals support more than 18,000 family-wage jobs and generate $ 895 million in wages, and $ 107 million in state and local taxes each year. (Martin and Associates report, September 2000.)

To ensure that rail remains unaffected, the two railroad companies owning and operating the system must continue to be heard and their needs supported. Further, the project may need rail operations modeling to demonstrate that proposed changes succeed in maintaining capacity and functionality. With regard to the information provided by the DEIS, we have the following comments:

- SIG, Whatcom, and Argo Yards support container terminal operations at T-5 and T-18 as well as T-46. In addition, the SIG and Whatcom tail track, rail access to Terminal 25 (northwest of East Marginal Way and Spokane Street), and the Duwamish rail system are integral parts of the system. All must be preserved.
- Recent Port analysis of rail needs at the Southern Segment supports this point. The tracks dedicated to interim storage capacity for double-stack cars for intermodal container operations are already at capacity, therefore, closing Whatcom Yard during construction would require replacement yards elsewhere prior to closing the yard. We have begun

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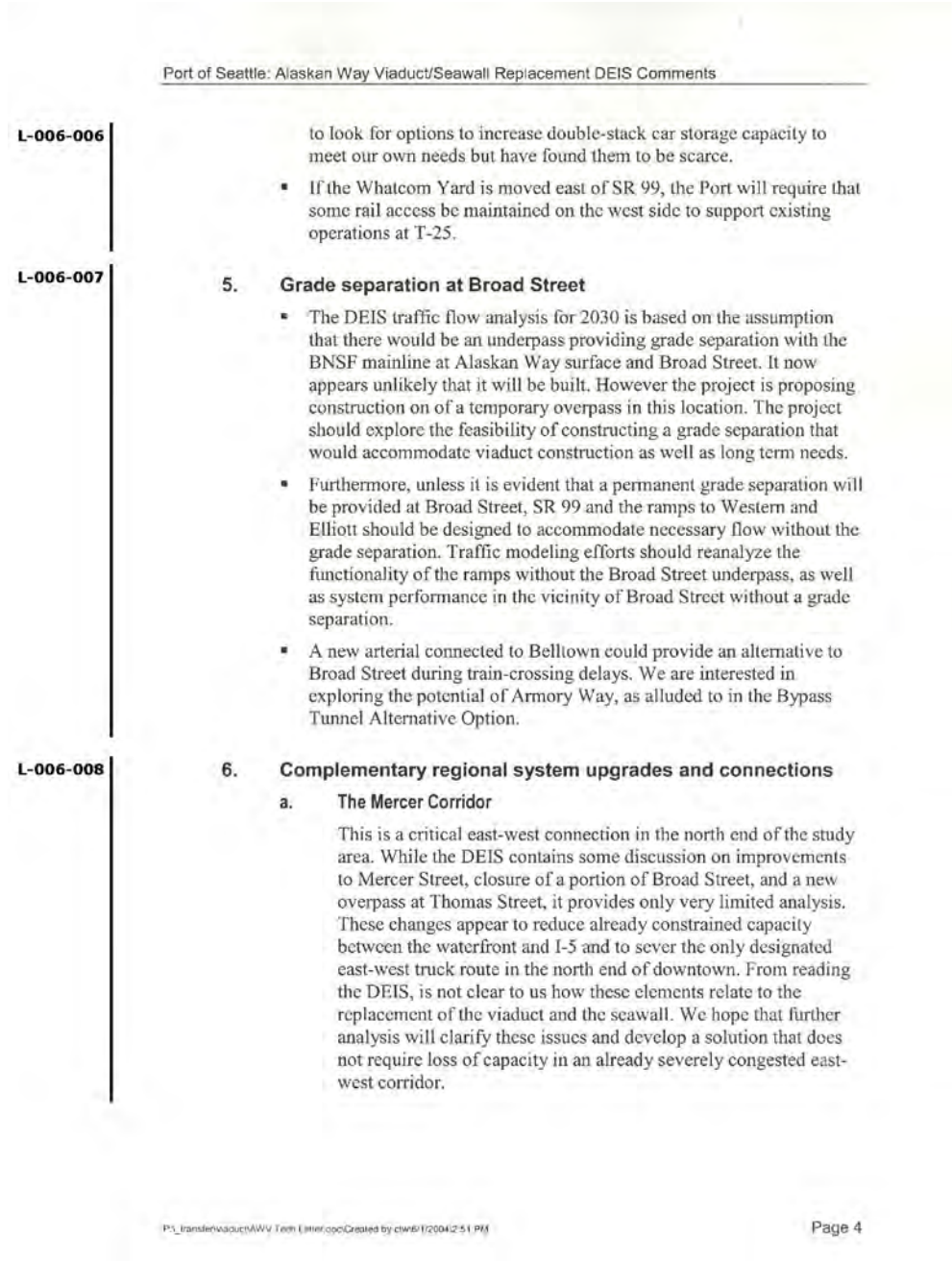
L-006-005

Coordination with the City of Seattle Department of Transportation to review freight route adjustments, including accommodations for over-legal vehicles, is ongoing. Currently, the City allows access through the Seattle Center City, provided over-legal truck operators obtain a permit and operate their trucks only during times allowed in the permit. As the project progresses, outreach to the freight community will continue to address the needs of over-legal trucks either as part of the Bored Tunnel Alternative (preferred alternative) or on the Alaskan Way surface street after construction. Analysis results addressing effects on trucks are provided in Appendix C, Transportation Discipline Report, of the Final EIS.

L-006-006

The project team is committed to continuing to work with the railroads, freight operators, and the Port of Seattle to explore opportunities to minimize both short and long-term impacts to freight rail operations, and container terminal access. All of the above stakeholders have been directly involved in early project design efforts and remain included in efforts involving final project design and construction management planning.



Port of Seattle: Alaskan Way Viaduct/Seawall Replacement DEIS Comments

L-006-006

to look for options to increase double-stack car storage capacity to meet our own needs but have found them to be scarce.

- If the Whatcom Yard is moved east of SR 99, the Port will require that some rail access be maintained on the west side to support existing operations at T-25.

L-006-007

5. Grade separation at Broad Street

- The DEIS traffic flow analysis for 2030 is based on the assumption that there would be an underpass providing grade separation with the BNSF mainline at Alaskan Way surface and Broad Street. It now appears unlikely that it will be built. However the project is proposing construction on of a temporary overpass in this location. The project should explore the feasibility of constructing a grade separation that would accommodate viaduct construction as well as long term needs.
- Furthermore, unless it is evident that a permanent grade separation will be provided at Broad Street, SR 99 and the ramps to Western and Elliott should be designed to accommodate necessary flow without the grade separation. Traffic modeling efforts should reanalyze the functionality of the ramps without the Broad Street underpass, as well as system performance in the vicinity of Broad Street without a grade separation.
- A new arterial connected to Belltown could provide an alternative to Broad Street during train-crossing delays. We are interested in exploring the potential of Armory Way, as alluded to in the Bypass Tunnel Alternative Option.

L-006-008

6. Complementary regional system upgrades and connections

a. The Mercer Corridor

This is a critical east-west connection in the north end of the study area. While the DEIS contains some discussion on improvements to Mercer Street, closure of a portion of Broad Street, and a new overpass at Thomas Street, it provides only very limited analysis. These changes appear to reduce already constrained capacity between the waterfront and I-5 and to sever the only designated east-west truck route in the north end of downtown. From reading the DEIS, is not clear to us how these elements relate to the replacement of the viaduct and the seawall. We hope that further analysis will clarify these issues and develop a solution that does not require loss of capacity in an already severely congested east-west corridor.

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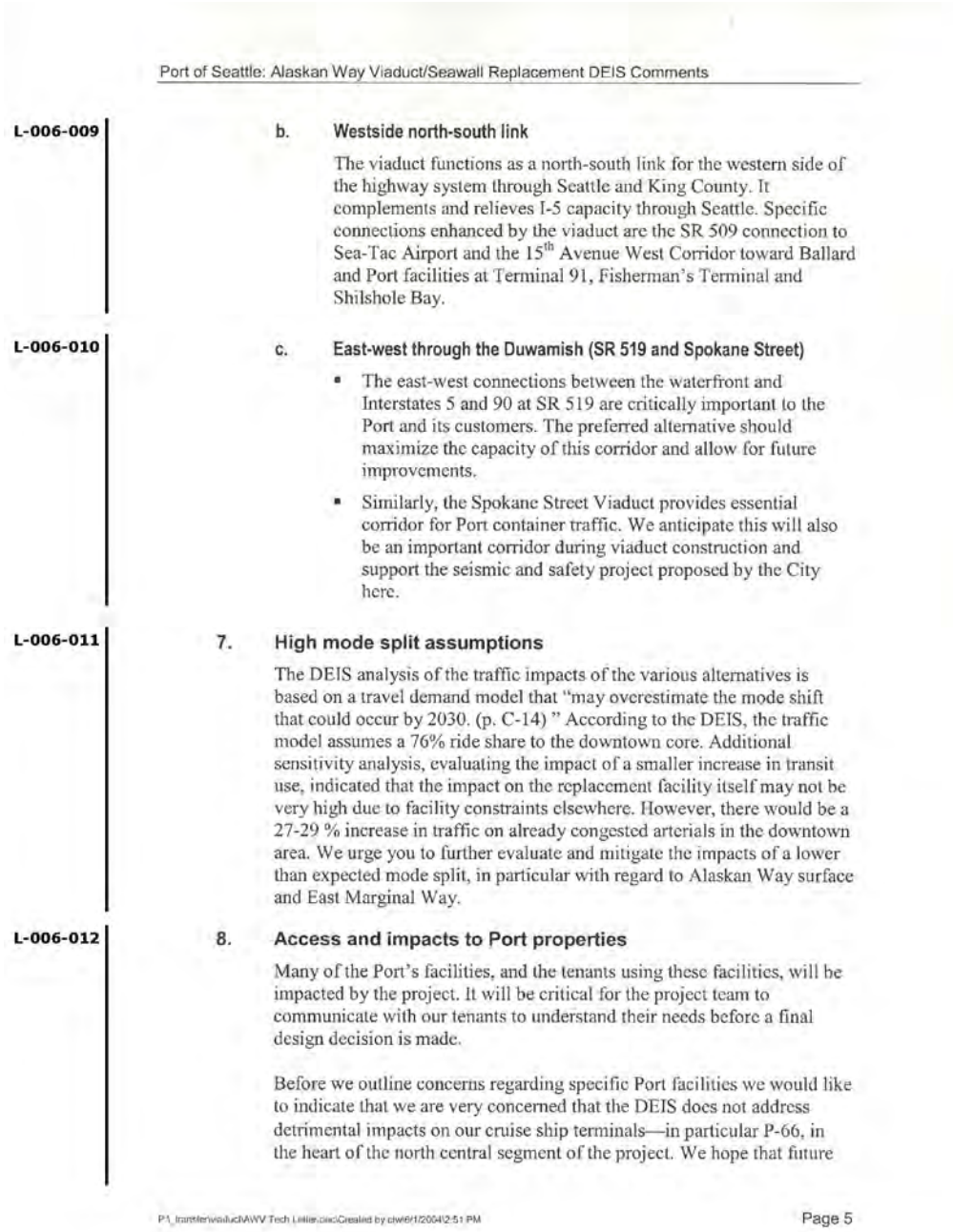
L-006-007

The Elevated Structure Alternative assumes the Broad Street detour during construction, but its route has changed since the Draft EIS. Please see the Final EIS Appendix C, Transportation Discipline Report, for updated construction staging for the Bored Tunnel (preferred alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives. The Elliott/Western Connector is an independent project being led by the City of Seattle. The Elliott/Western Connector would provide a connection from Alaskan Way to the Elliott/Western corridor that provides access to and from BINMIC and neighborhoods north of Seattle. The connector would provide an overcrossing of the BNSF mainline railroad tracks.

L-006-008

The Mercer corridor from Dexter Avenue to Fifth Avenue is included as part of the Alaskan Way Viaduct Replacement Project. The Mercer corridor from Fifth Avenue to Elliott Avenue is an independent project being led by the City of Seattle. Appendix C, Transportation Discipline Report, of the Final EIS contains supplementary information regarding the Mercer Corridor, which will provide improved east-west travel in the north section of the study area.



Port of Seattle: Alaskan Way Viaduct/Seawall Replacement DEIS Comments

L-006-009

b. **Westside north-south link**

The viaduct functions as a north-south link for the western side of the highway system through Seattle and King County. It complements and relieves I-5 capacity through Seattle. Specific connections enhanced by the viaduct are the SR 509 connection to Sea-Tac Airport and the 15th Avenue West Corridor toward Ballard and Port facilities at Terminal 91, Fisherman's Terminal and Shilshole Bay.

L-006-010

c. **East-west through the Duwamish (SR 519 and Spokane Street)**

- The east-west connections between the waterfront and Interstates 5 and 90 at SR 519 are critically important to the Port and its customers. The preferred alternative should maximize the capacity of this corridor and allow for future improvements.
- Similarly, the Spokane Street Viaduct provides essential corridor for Port container traffic. We anticipate this will also be an important corridor during viaduct construction and support the seismic and safety project proposed by the City here.

L-006-011

7. **High mode split assumptions**

The DEIS analysis of the traffic impacts of the various alternatives is based on a travel demand model that "may overestimate the mode shift that could occur by 2030. (p. C-14) " According to the DEIS, the traffic model assumes a 76% ride share to the downtown core. Additional sensitivity analysis, evaluating the impact of a smaller increase in transit use, indicated that the impact on the replacement facility itself may not be very high due to facility constraints elsewhere. However, there would be a 27-29 % increase in traffic on already congested arterials in the downtown area. We urge you to further evaluate and mitigate the impacts of a lower than expected mode split, in particular with regard to Alaskan Way surface and East Marginal Way.

L-006-012

8. **Access and impacts to Port properties**

Many of the Port's facilities, and the tenants using these facilities, will be impacted by the project. It will be critical for the project team to communicate with our tenants to understand their needs before a final design decision is made.

Before we outline concerns regarding specific Port facilities we would like to indicate that we are very concerned that the DEIS does not address detrimental impacts on our cruise ship terminals—in particular P-66, in the heart of the north central segment of the project. We hope that future

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L-006-009

All three build alternatives evaluated in the Final EIS would maintain or improve the transportation system connections and vehicle capacity that exist today. Please see the Final EIS, Appendix C Transportation Discipline Report.

L-006-010

The lead agencies acknowledge these comments. The Bored Tunnel Alternative has been identified as the preferred alternative for this project. Please see the Final EIS for current project information.

L-006-011

The travel demand model was updated for the Final EIS and is described in the Transportation Discipline Report (Appendix C of the Final EIS). The update includes improvements to how the model reflects capacity constraints in the roadway network, reduced sensitivity to parking cost assumptions, updated population and employment estimates, updated transit mode share, and verification of network components and their attributes. Please see the Final EIS Appendix C, Transportation Discipline Report, for updated analysis results.

L-006-012

Under the preferred Bored Tunnel Alternative, the City of Seattle is responsible for improvements to the Alaskan Way surface street. Generally, the new street would be located east of the existing Alaskan Way surface street where the viaduct is today to create a wider public space along the waterfront the new street would include sidewalks, bicycle facilities, parking/loading zones, and signalized pedestrian crossings at cross-streets. Access to Pier 66 would be maintained throughout construction. Transportation mitigation measures can be found in Chapter 8 of the Final EIS.

L-006-012

analysis will provide a more in-depth analysis of the needs of our cruise ship operations. Following is an overview of our operations:

This summer, we expect about 150 cruise ship port calls at T-30 (about 90 port calls) and P-66 (about 60 port calls). This generates about 570,000 passenger and over 6,000 truck trips to and from the two terminals.

The majority of ships calling on Seattle today provide capacity for between 1,800 and 2,800 passengers. The trend for new ships coming on line is an increase in passenger capacity. In the past five years, average capacity has grown from about 2,000 to almost 3,000 passengers. Cruise ships making port calls today generate the following number of passenger trips:

Table 1:
Number of Vehicle Trips Generated by Passengers on a Cruise Ship

Mode of Travel	Vehicle Occupancy	1,800 Passenger Ship		2,800 Passenger Ship	
		Drop-off	Pick-up	Drop-off	Pick-up
Pass. Veh. Parked [a]	2.0/veh.	165	165	210	210
Pass. Veh. Drop-off [b]	2.0/veh.	110	110	140	140
Buses [b]	33.0/veh.	100	100	128	128
Taxis [b]	2.0/veh.	110	110	140	140
Total		485	485	618	618

[a] Each drop-off and pick-up generates one trip on each end of the cruise. [b] Each drop-off and pick-up generates two trips on each end of the cruise. (Source: Heffron Transportation, Traffic Impact Analysis for Cruise Ship Terminal at Terminal 30, September 3, 2002.)

Our cruise terminals operate from May to October. Port calls occur generally on Monday, Thursday, Friday, Saturday and Sunday, trips occur during about an 8-9 hour time-frame between 8 am and 5pm. The economic impact of the cruise ship for the regional economy is significant: In 2004, the Port's cruise ship terminals are estimated to generate about 1,700 jobs and more than $ 200 million in business revenue. During the next 10 years, we expect our cruise ship business to grow by about 50%.

L-006-013

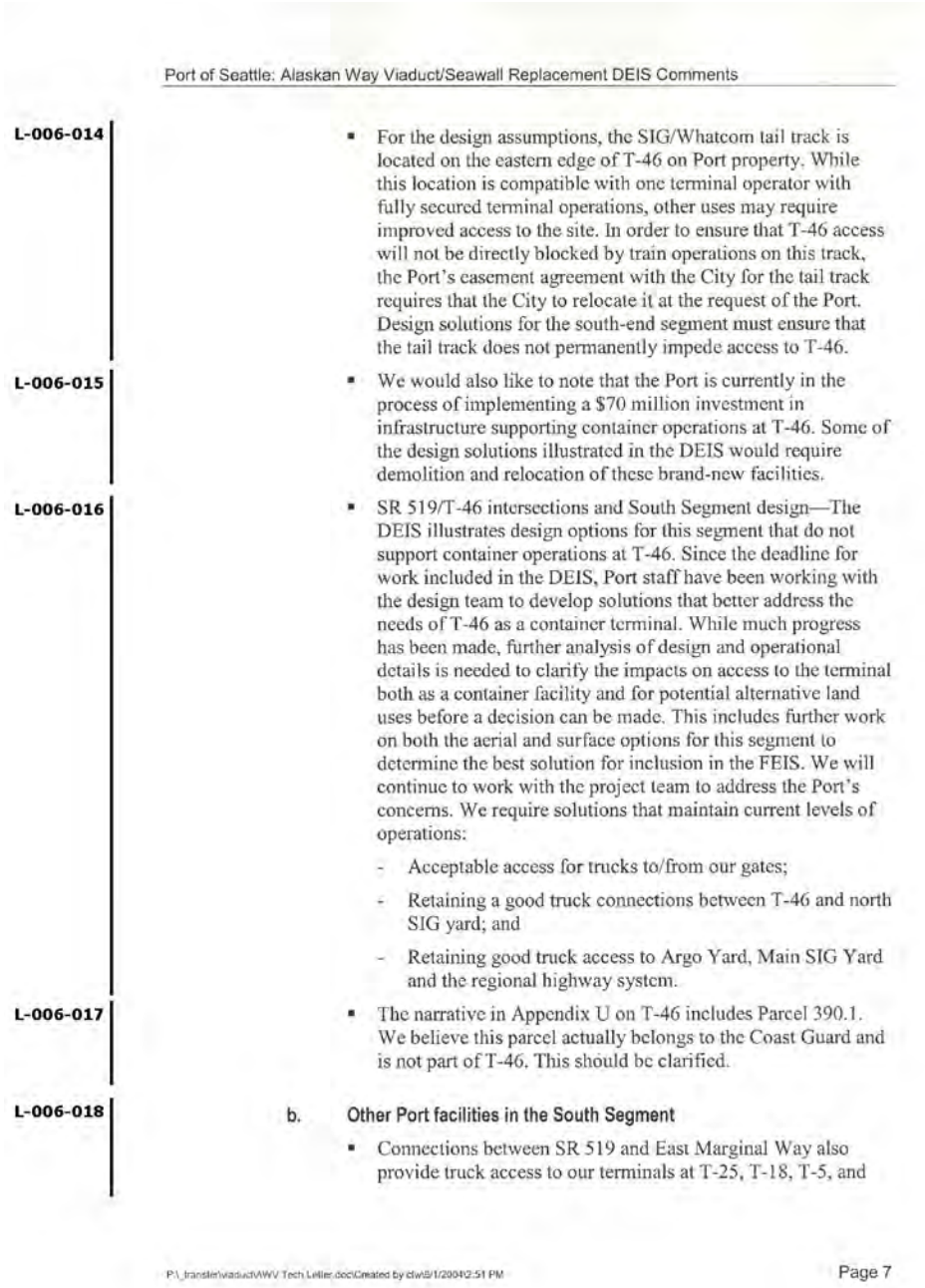
a. **South Segment: Terminal 46**

- Design solutions for the South Segment must avoid that Port property which is needed for container operations. (Neither SR 99 ramps, nor the proposed ferry holding lot or access roads for Colman Dock should infringe on the container terminal.) Alternatives as shown in DEIS would severely curtail the functionality of container operations. T-46 is our smallest operating container terminal, its current acreage represents the minimum space requirement for our tenant. Further loss of space would significantly reduce the terminal's viability for container operations, to the detriment of the local economy. Today, the terminal directly supports 1,366 jobs in the local economy, resulting in $ 73.4 million in personal income and $ 69.9 million in state and local taxes annually.

Access to Pier 66 would be maintained throughout construction with the Cut-and-Cover Tunnel and Elevated Structure Alternatives as well.

L-006-013

The lead agencies are proposing to use a large portion of the northwest corner of T-46 as a primary staging area for materials laydown and storage starting at the northern T-46 apron face and using a portion of the apron face at the west corner of the terminal yard. This staging use would require a portion of the container storage area currently used for refrigerated container storage and the demolition of a portion of an existing building on this site. The lead agencies are coordinating with the Port of Seattle on this issue.



Port of Seattle: Alaskan Way Viaduct/Seawall Replacement DEIS Comments

L-006-014

- For the design assumptions, the SIG/Whatcom tail track is located on the eastern edge of T-46 on Port property. While this location is compatible with one terminal operator with fully secured terminal operations, other uses may require improved access to the site. In order to ensure that T-46 access will not be directly blocked by train operations on this track, the Port's easement agreement with the City for the tail track requires that the City to relocate it at the request of the Port. Design solutions for the south-end segment must ensure that the tail track does not permanently impede access to T-46.

L-006-015

- We would also like to note that the Port is currently in the process of implementing a $70 million investment in infrastructure supporting container operations at T-46. Some of the design solutions illustrated in the DEIS would require demolition and relocation of these brand-new facilities.

L-006-016

- SR 519/T-46 intersections and South Segment design—The DEIS illustrates design options for this segment that do not support container operations at T-46. Since the deadline for work included in the DEIS, Port staff have been working with the design team to develop solutions that better address the needs of T-46 as a container terminal. While much progress has been made, further analysis of design and operational details is needed to clarify the impacts on access to the terminal both as a container facility and for potential alternative land uses before a decision can be made. This includes further work on both the aerial and surface options for this segment to determine the best solution for inclusion in the FEIS. We will continue to work with the project team to address the Port's concerns. We require solutions that maintain current levels of operations:
  - Acceptable access for trucks to/from our gates;
  - Retaining a good truck connections between T-46 and north SIG yard; and
  - Retaining good truck access to Argo Yard, Main SIG Yard and the regional highway system.

L-006-017

- The narrative in Appendix U on T-46 includes Parcel 390.1. We believe this parcel actually belongs to the Coast Guard and is not part of T-46. This should be clarified.

L-006-018

b. Other Port facilities in the South Segment

- Connections between SR 519 and East Marginal Way also provide truck access to our terminals at T-25, T-18, T-5, and

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L-006-014

The Final EIS discusses the reconfigured Whatcom Railyard with the tail track relocated for the Elevated Structure and Cut-and-Cover Tunnel Alternatives. The design for both the Cut-and-Cover Tunnel and the Elevated Structure Alternatives keeps the tail track operational and maintains access to Terminal 46. For the preferred alternative, the Bored Tunnel Alternative, the railyard would not be altered.

L-006-015

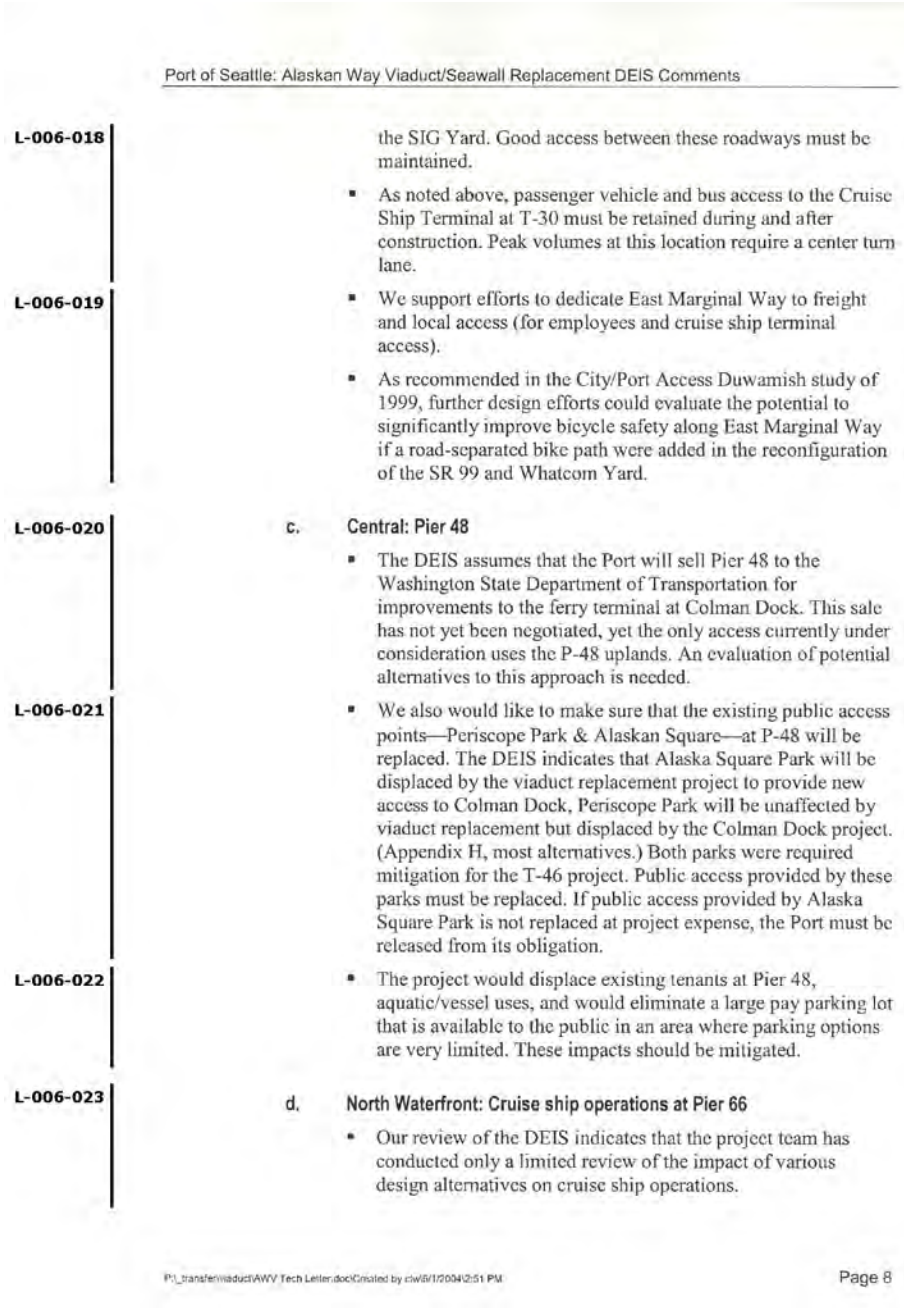
The infrastructure improvements at T-46 that were recently made by the Port of Seattle to support container operations were taken into consideration when the latest alignment designs were developed for both the Cut-and-Cover Tunnel Alternative (Conceptual Design Plans, August 2006) and the Elevated Structure Alternative (Conceptual Design Plans, January 2007).

L-006-016

As part of the SR 519 Phase 2 Intermodal Access Project, the FHWA and WSDOT proposed to increase mobility and safety by improving connections between I-5/I-90 and the stadium area, the waterfront commercial interests, the Seattle Ferry Terminal, and the Port of Seattle's container freight terminals. The SR 519 Environmental Assessment (EA) evaluated the Atlantic Corridor Option, which includes:

- Westbound off-ramp from I-5 to I-90 to the current S. Atlantic Street overpass.
- Improvements at intersections of First Avenue/S. Atlantic and S. Atlantic and Occidental Avenue.
- Grade-separated crossings for both vehicles and pedestrians at S. Royal Brougham Way.

FHWA and WSDOT released the SR 519 EA in late 2007. The project was completed in 2010.



Port of Seattle: Alaskan Way Viaduct/Seawall Replacement DEIS Comments

L-006-018

the SIG Yard. Good access between these roadways must be maintained.

- As noted above, passenger vehicle and bus access to the Cruise Ship Terminal at T-30 must be retained during and after construction. Peak volumes at this location require a center turn lane.

L-006-019

- We support efforts to dedicate East Marginal Way to freight and local access (for employees and cruise ship terminal access).
- As recommended in the City/Port Access Duwamish study of 1999, further design efforts could evaluate the potential to significantly improve bicycle safety along East Marginal Way if a road-separated bike path were added in the reconfiguration of the SR 99 and Whatcom Yard.

L-006-020

c. **Central: Pier 48**

- The DEIS assumes that the Port will sell Pier 48 to the Washington State Department of Transportation for improvements to the ferry terminal at Colman Dock. This sale has not yet been negotiated, yet the only access currently under consideration uses the P-48 uplands. An evaluation of potential alternatives to this approach is needed.

L-006-021

- We also would like to make sure that the existing public access points—Periscope Park & Alaskan Square—at P-48 will be replaced. The DEIS indicates that Alaska Square Park will be displaced by the viaduct replacement project to provide new access to Colman Dock, Periscope Park will be unaffected by viaduct replacement but displaced by the Colman Dock project. (Appendix H, most alternatives.) Both parks were required mitigation for the T-46 project. Public access provided by these parks must be replaced. If public access provided by Alaska Square Park is not replaced at project expense, the Port must be released from its obligation.

L-006-022

- The project would displace existing tenants at Pier 48, aquatic/vessel uses, and would eliminate a large pay parking lot that is available to the public in an area where parking options are very limited. These impacts should be mitigated.

L-006-023

d. **North Waterfront: Cruise ship operations at Pier 66**

- Our review of the DEIS indicates that the project team has conducted only a limited review of the impact of various design alternatives on cruise ship operations.

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L-006-017

The Port of Seattle is the taxpayer of record for blocks 350.1 and 360.1 (766207631 and 7666207695 [Pier 46]), with the exception of parcel 7666207697 owned by King County (outfall at King Street) and parcels on the west edge of the terminal (7666207696, -698, -699) owned by the State of Washington.

Block 390.1-5 is owned by the Coast Guard (parcel 7666207786) (south of S. Atlantic Street, closer to Elliott Bay). The owner is not displayed on the map, and this detailed information is only presented in Attachment D of Appendix Q, Hazardous Materials Discipline Report, in the Final EIS.

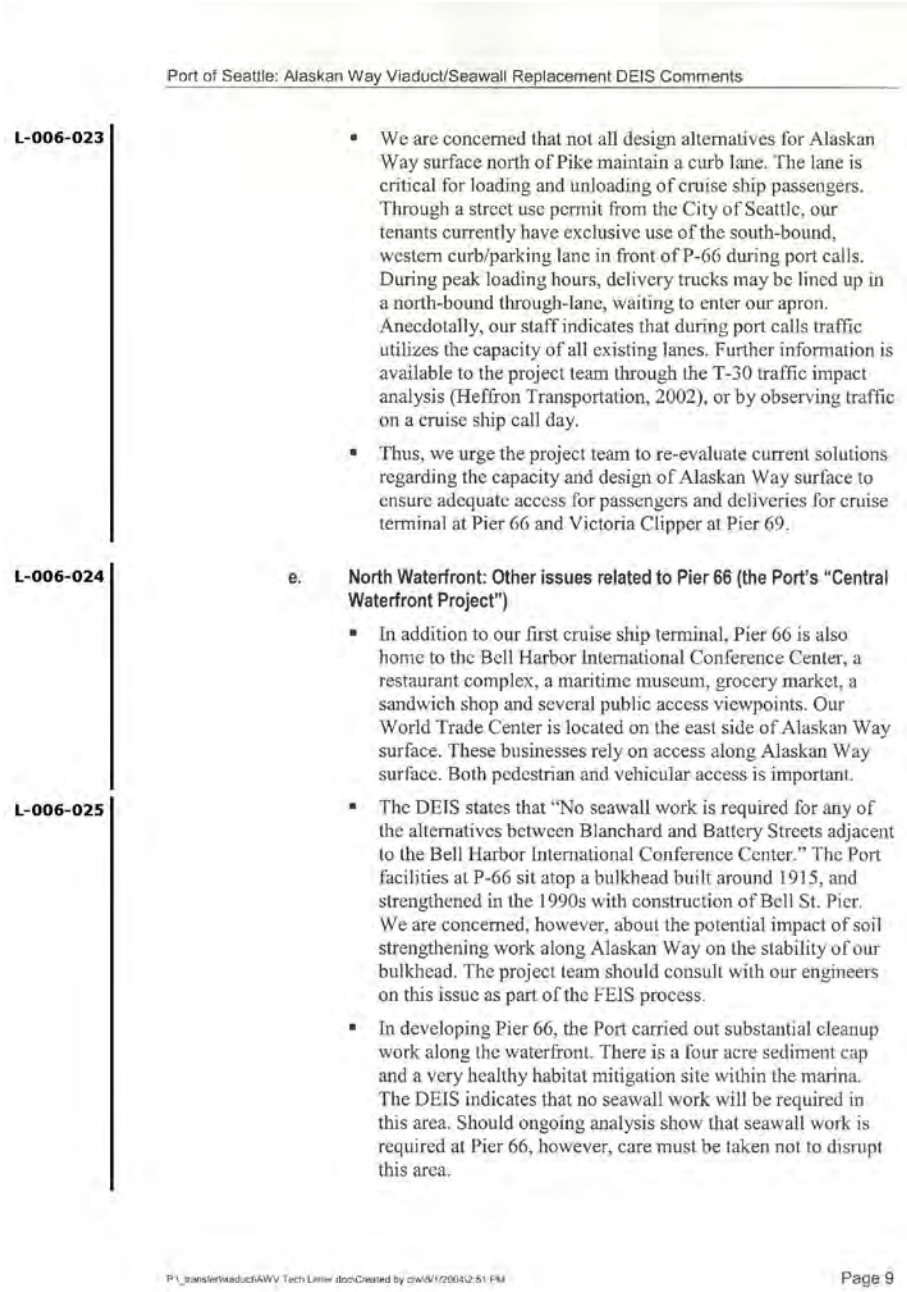
L-006-018

The lead agencies have been coordinating with the Port of Seattle to ensure reasonable truck access to the Port terminals at T-25, T-18, T-5, and the SIG railyard during construction. Please also see the response to L-006-016 above.

Local access during construction will be maintained to the cruise ship terminals as discussed in the Final EIS and in Appendix C, Transportation Discipline Report.

L-006-019

East Marginal Way will continue to provide access to Terminal 46 from the south. A shared use bicycle/pedestrian lane would be located along the west side of E. Marginal Way/Alaskan Way S. and would continue north along the west side of the tail track. In the area near Terminal 46, the S. Holgate Street to S. King Street Viaduct Replacement Project will be constructing the Port Side Trail and the City Side Trail, which are shared use bicycle/pedestrian facilities separated from vehicle traffic. The Alaskan Way Viaduct Replacement Project would shift the location of the City Side Trail slightly.



Port of Seattle: Alaskan Way Viaduct/Seawall Replacement DEIS Comments

L-006-023

- We are concerned that not all design alternatives for Alaskan Way surface north of Pike maintain a curb lane. The lane is critical for loading and unloading of cruise ship passengers. Through a street use permit from the City of Seattle, our tenants currently have exclusive use of the south-bound, western curb/parking lane in front of P-66 during port calls. During peak loading hours, delivery trucks may be lined up in a north-bound through-lane, waiting to enter our apron. Anecdotally, our staff indicates that during port calls traffic utilizes the capacity of all existing lanes. Further information is available to the project team through the T-30 traffic impact analysis (Heffron Transportation, 2002), or by observing traffic on a cruise ship call day.
- Thus, we urge the project team to re-evaluate current solutions regarding the capacity and design of Alaskan Way surface to ensure adequate access for passengers and deliveries for cruise terminal at Pier 66 and Victoria Clipper at Pier 69.

L-006-024

e. **North Waterfront: Other issues related to Pier 66 (the Port's "Central Waterfront Project")**

- In addition to our first cruise ship terminal, Pier 66 is also home to the Bell Harbor International Conference Center, a restaurant complex, a maritime museum, grocery market, a sandwich shop and several public access viewpoints. Our World Trade Center is located on the east side of Alaskan Way surface. These businesses rely on access along Alaskan Way surface. Both pedestrian and vehicular access is important.

L-006-025

- The DEIS states that "No seawall work is required for any of the alternatives between Blanchard and Battery Streets adjacent to the Bell Harbor International Conference Center." The Port facilities at P-66 sit atop a bulkhead built around 1915, and strengthened in the 1990s with construction of Bell St. Pier. We are concerned, however, about the potential impact of soil strengthening work along Alaskan Way on the stability of our bulkhead. The project team should consult with our engineers on this issue as part of the FEIS process.
- In developing Pier 66, the Port carried out substantial cleanup work along the waterfront. There is a four acre sediment cap and a very healthy habitat mitigation site within the marina. The DEIS indicates that no seawall work will be required in this area. Should ongoing analysis show that seawall work is required at Pier 66, however, care must be taken not to disrupt this area.

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L-006-020

The Port of Seattle has sold Pier 48 to WSDOT. WSDOT is currently the owner of this property. See the Final EIS for current information about the project's use of Pier 48.

L-006-021

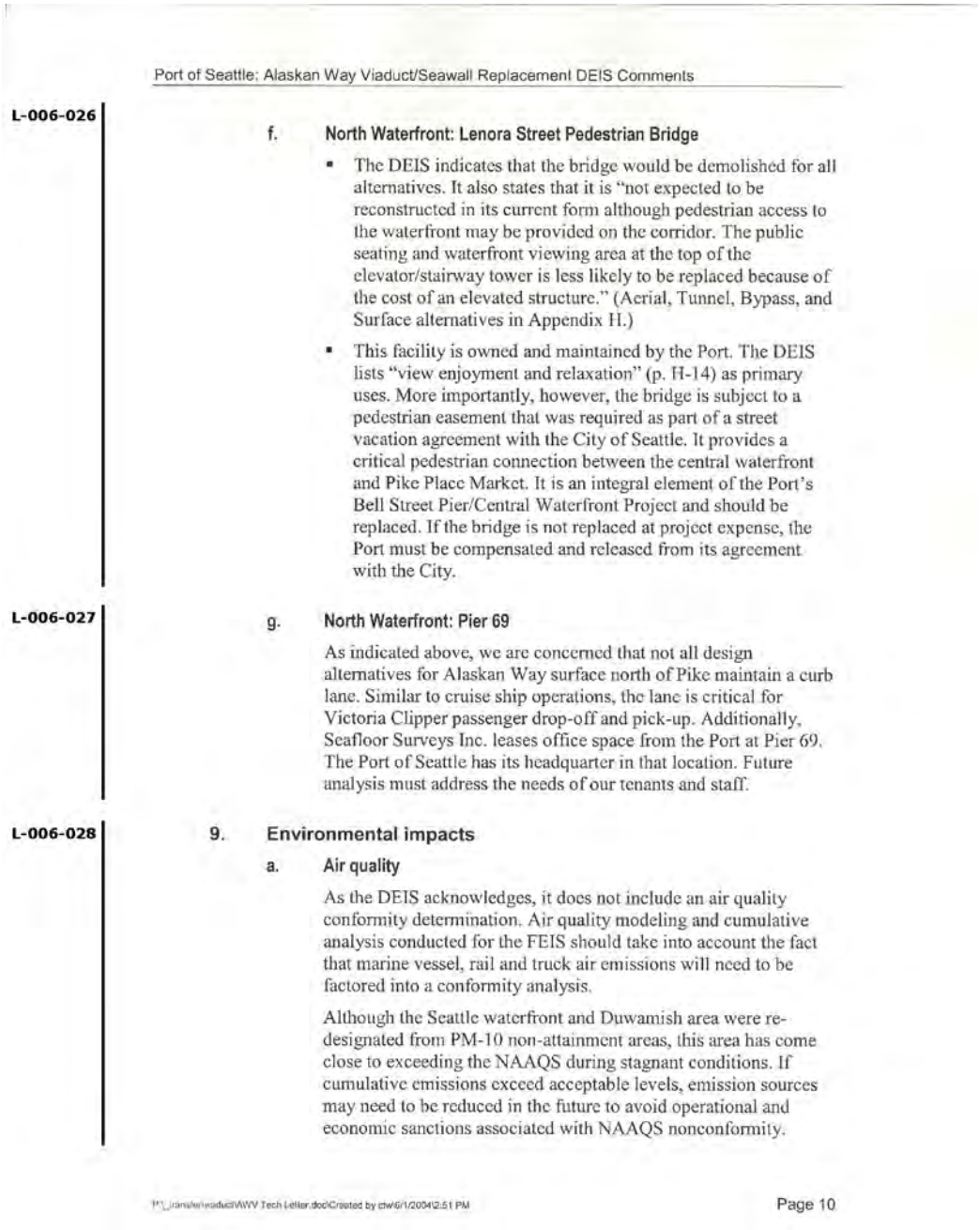
The Port of Seattle has sold Pier 48 to WSDOT. WSDOT is currently the owner of this property. See the Final EIS for current information about the project's use of Pier 48. Construction workers would park in the upland area of Pier 48, northwest of Qwest Field. A temporary overwater access bridge to the ferries would be built between Pier 48 and Colman Dock (between S. Washington Street and Yesler Way). The temporary ferry access bridge would maintain access and egress for ferry operations. The temporary bridge would not interfere with the Washington State Ferries' planned reconstruction of Colman Dock, it would accommodate a range of potential ferry expansion plans while not requiring any of these plans to be constructed before the seawall construction. This overwater crossing would connect to a relocated ferry holding area east of SR 99.

The project will be responsible for replacement of any shoreline public access facilities that may be displaced. Any displacement of the Port's public access by the Colman Dock Project would be a separate action independent of this project, and the project would not be responsible.

Any displacement of the Port's public access by the Colman Dock Project would be a separate action independent of this project, and the project would not be responsible.

L-006-022

WSDOT is now the owner of Pier 48 and the uses that existed in 2004 are no longer there. Mitigation for the potential loss of some parking



Port of Seattle: Alaskan Way Viaduct/Seawall Replacement DEIS Comments

L-006-026

f. North Waterfront: Lenora Street Pedestrian Bridge

- The DEIS indicates that the bridge would be demolished for all alternatives. It also states that it is "not expected to be reconstructed in its current form although pedestrian access to the waterfront may be provided on the corridor. The public seating and waterfront viewing area at the top of the elevator/stairway tower is less likely to be replaced because of the cost of an elevated structure." (Aerial, Tunnel, Bypass, and Surface alternatives in Appendix H.)
- This facility is owned and maintained by the Port. The DEIS lists "view enjoyment and relaxation" (p. H-14) as primary uses. More importantly, however, the bridge is subject to a pedestrian easement that was required as part of a street vacation agreement with the City of Seattle. It provides a critical pedestrian connection between the central waterfront and Pike Place Market. It is an integral element of the Port's Bell Street Pier/Central Waterfront Project and should be replaced. If the bridge is not replaced at project expense, the Port must be compensated and released from its agreement with the City.

L-006-027

g. North Waterfront: Pier 69

As indicated above, we are concerned that not all design alternatives for Alaskan Way surface north of Pike maintain a curb lane. Similar to cruise ship operations, the lane is critical for Victoria Clipper passenger drop-off and pick-up. Additionally, Seafloor Surveys Inc. leases office space from the Port at Pier 69. The Port of Seattle has its headquarter in that location. Future analysis must address the needs of our tenants and staff.

L-006-028

9. Environmental impacts

a. Air quality

As the DEIS acknowledges, it does not include an air quality conformity determination. Air quality modeling and cumulative analysis conducted for the FEIS should take into account the fact that marine vessel, rail and truck air emissions will need to be factored into a conformity analysis.

Although the Seattle waterfront and Duwamish area were re-designated from PM-10 non-attainment areas, this area has come close to exceeding the NAAQS during stagnant conditions. If cumulative emissions exceed acceptable levels, emission sources may need to be reduced in the future to avoid operational and economic sanctions associated with NAAQS nonconformity.

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spaces along the project route will be provided, but is not anticipated that every space that may be lost will be replaced.

L-006-023

Under the preferred Bored Tunnel Alternative, the City of Seattle is responsible for improvements to the Alaskan Way surface street through a separate project. The Cut-and-Cover Tunnel and Elevated Structure Alternatives include a 10-foot parking lane in front of Pier 66. Adequate street access to the cruise terminal facility at Pier 66 and the Victoria Clipper passenger service at Pier 69 is ensured for both facilities. Access for the bus and passenger vehicles that serve those facilities has been a consideration in the design of the Cut-and-Cover Tunnel Alternative and Elevated Structure Alternative.

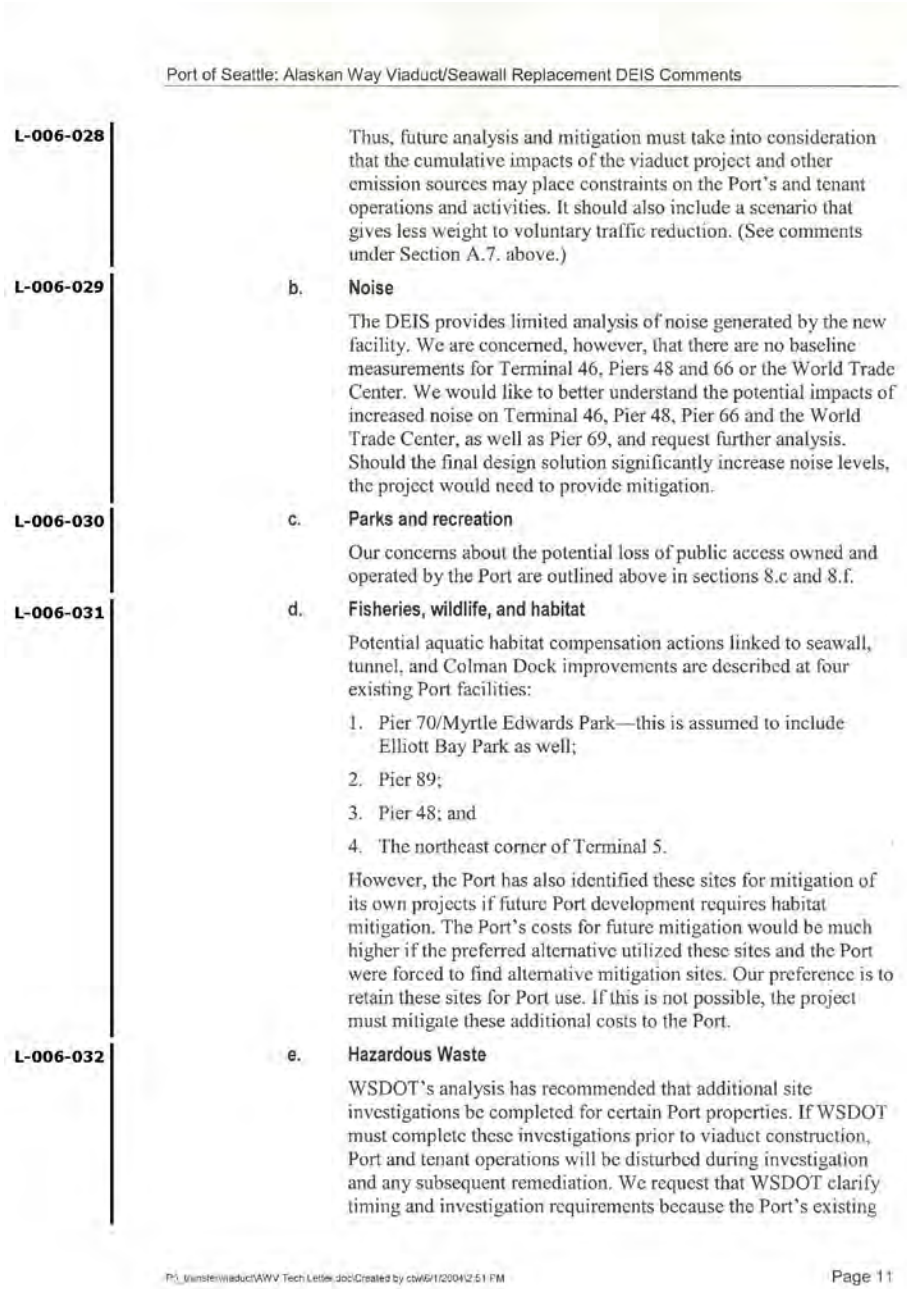
L-006-024

Under the preferred Bored Tunnel Alternative, the City of Seattle is responsible for improvements to the Alaskan Way surface street. The Alaskan Way surface street is designated as a primary arterial and major truck route by the City of Seattle. The project team recognizes that it provides the only access to many Port facilities, businesses along the waterfront, as well as to ferry operations at Colman Dock. Vehicular capacity and access to and from the Alaskan Way surface street will be maintained or improved with all build alternatives evaluated in the Final EIS.

L-006-025

The soil improvement work that would take place as part of the Alaskan Way Viaduct Replacement Project next to Pier 66 would be far enough away from the Port's bulkhead that any impact on the bulkhead would be unlikely.

With the preferred alternative, seawall replacement would occur under a



Port of Seattle: Alaskan Way Viaduct/Seawall Replacement DEIS Comments

L-006-028

Thus, future analysis and mitigation must take into consideration that the cumulative impacts of the viaduct project and other emission sources may place constraints on the Port's and tenant operations and activities. It should also include a scenario that gives less weight to voluntary traffic reduction. (See comments under Section A.7. above.)

L-006-029

b. **Noise**

The DEIS provides limited analysis of noise generated by the new facility. We are concerned, however, that there are no baseline measurements for Terminal 46, Piers 48 and 66 or the World Trade Center. We would like to better understand the potential impacts of increased noise on Terminal 46, Pier 48, Pier 66 and the World Trade Center, as well as Pier 69, and request further analysis. Should the final design solution significantly increase noise levels, the project would need to provide mitigation.

L-006-030

c. **Parks and recreation**

Our concerns about the potential loss of public access owned and operated by the Port are outlined above in sections 8.c and 8.f.

L-006-031

d. **Fisheries, wildlife, and habitat**

Potential aquatic habitat compensation actions linked to seawall, tunnel, and Colman Dock improvements are described at four existing Port facilities:

1. Pier 70/Myrtle Edwards Park—this is assumed to include Elliott Bay Park as well;
2. Pier 89;
3. Pier 48; and
4. The northeast corner of Terminal 5.

However, the Port has also identified these sites for mitigation of its own projects if future Port development requires habitat mitigation. The Port's costs for future mitigation would be much higher if the preferred alternative utilized these sites and the Port were forced to find alternative mitigation sites. Our preference is to retain these sites for Port use. If this is not possible, the project must mitigate these additional costs to the Port.

L-006-032

e. **Hazardous Waste**

WSDOT's analysis has recommended that additional site investigations be completed for certain Port properties. If WSDOT must complete these investigations prior to viaduct construction, Port and tenant operations will be disturbed during investigation and any subsequent remediation. We request that WSDOT clarify timing and investigation requirements because the Port's existing

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separate project, the Elliott Bay Seawall Project, led by the City of Seattle.

L-006-026

Under the preferred Bored Tunnel Alternative, the City of Seattle is responsible for improvements to the Alaskan Way surface street. The Lenora Street pedestrian access bridge between Western Avenue and Alaskan Way would be maintained for the Elevated Structure and Cut-and-Cover Tunnel alternatives.

L-006-027

The layouts for the Alaskan Way surface street have been updated for the Final EIS. Both the Cut-and-Cover Tunnel and Elevated Structure Alternatives will maintain two southbound lanes and a parking lane in the vicinity of Pike Street. The Bored Tunnel Alternative does not include the Alaskan Way surface street as part of the project. However, the new street is expected to include sidewalks, bicycle facilities, parking/loading zones, and signalized pedestrian crossings at cross-streets. The ultimate design of Alaskan Way will be determined as part of the City of Seattle's Central Waterfront Project.

While construction activities near Pike Street may impact operations on Alaskan Way, the project will work closely with the Port and waterfront business to ensure reasonable access is maintained during business hours.

L-006-028

The current air quality modeling analysis is presented in Appendix M, Air Discipline Report, of the Final EIS. Marine vessel, rail, and truck emissions are included in the air quality analysis as background concentrations.

L-006-032

operations, and possibly future development of these properties, could be substantially impaired by WSDOT's investigation and analysis.

B. Construction Impacts

L-006-033

The construction impacts for the replacement of the viaduct and the seawall will be massive and should be identified as significant adverse impacts. We understand that the analysis carried out for the DEIS is limited and will be more substantial once a preferred alternative has been identified. Our letter to Secretary Douglas and Mayor Nickels outlines three structured approaches that will allow the Port to comment on the next steps of analysis and negotiate any mitigation needs before the FEIS analysis is completed.

Construction staging and detours will have a major impact on many of our tenants. We have attempted to address their concerns in our comments and will continue to do so throughout the process. However, it will be essential for the project team to contact these tenants and work with them as construction staging, detour and closure plans are developed.

Similarly, the project will require takings under any design alternative. At this point, the impact on the Port is unclear. The DEIS states that a Relocation Plan will be developed as part of the FEIS. We expect the opportunity to review and comment on the plan.

As indicated above, the DEIS contains only a very limited amount of information on construction impacts. Regarding that limited information, we have the following comments:

L-006-034

1. Temporary facilities

The DEIS contains two designs for temporary facilities intended to maintain an "open corridor." Both facilities would have a profound impact on the waterfront. The DEIS contains no analysis of these impacts. In-depth analysis will be needed to understand the implications of each alternative, including cost, corridor traffic flow, and the impact on businesses and traffic flow on the North Waterfront.

a. Broad Street Detour

Specific issues regarding this temporary facility that must be evaluated include:

- Traffic volumes/impact on Alaskan Way surface south of the touchdown.
- Impact on cruise ship access at Pier 66.

L-006-029

Noise impacts are only evaluated in areas with existing noise sensitive land uses. WSDOT and FHWA only consider mitigation measures for existing noise sensitive land uses. The waterfront area south of King Street is an industrial area owned by the Port of Seattle. No noise sensitive land uses currently exist in this area. Please see the Final EIS and Appendix F, Noise Discipline Report, for the current noise analysis.

L-006-030

The Port of Seattle has sold Pier 48 to WSDOT. WSDOT is currently the owner of this property. See the Final EIS for current information about he project's use of Pier 48.

The project will be responsible for replacement of any shoreline public access facilities that may be displaced. Any displacement of the Port's public access by the Colman Dock Project would be a separate action independent of this project, and the project would not be responsible.

Any displacement of the Port's public access by the Colman Dock Project would be a separate action independent of this project, and the project would not be responsible.

L-006-031

If the preferred alternative is selected, replacement of the seawall would occur under a separate project led by the City of Seattle. Similarly, the Colman Dock Project is a separate project. The Port of Seattle will need to coordinate with those projects to address concerns about their proposed compensatory mitigation sites.

L-006-032

Investigation requirements would be based on property-specific parameters and cannot be determined at this time. However, if

L-006-034

- Access to the "north apron" of Pier 69, which provides loading docks and minor on-site parking, including ADA parking.
- Impact on the Victoria Clipper's operation. Currently, Victoria Clipper ground access relies on a curb lane on Alaskan Way surface adjacent to their loading dock at P-69 for taxi queuing, charter bus parking and loading, as well as private automobile pick-up and drop-off.
- Impact on south-bound movement of traffic from Ballard/Interbay, given that the Broad Street underpass will not be built in advance of this project. The DEIS states that "Southbound traffic from Ballard/Interbay area would travel under the railroad tracks at Broad Street by using an underpass." (p. 23)

b. **Battery Street Flyover:**

Specific issues to be evaluated regarding this temporary facility include the impacts of the columns supporting the facility on:

- Traffic flow on Alaskan Way surface; and
- Access for our tenants at Pier 66, including the cruise ship terminal loading area, the world trade center, Bell Harbor International Conference Center.
- Impacts to other waterfront businesses and residences.
- Construction duration

L-006-035

2. **Analysis of "closed corridor" impacts**

a. **Analysis of SR99 closure**

In our July 2002 comments, we indicated that it is critical that the existing viaduct continue to operate until the replacement is complete. We made this statement because of the magnitude of the likely impacts of full closure for all through traffic on SR 99. However, analysis carried out for the DEIS indicates that maintaining traffic flow on SR 99 throughout the entire construction period significantly adds to project costs and construction duration. It would be valuable to evaluate the potential effects of a full closure of both the entire corridor and individual segments of the corridor for the entire construction period and determine the trade-offs associated with this approach. The analysis should include, but not be limited to the impacts on:

- Project cost;
- Construction duration;

necessary, explorations or other testing can be conducted at night or on weekends, which would minimize potential impacts to ongoing operations. Remedial activities, if necessary, could be accomplished during construction or could be designed to accommodate ongoing operations at the facility.

The statement "Site investigations, if necessary, will be coordinated with the property owner" has been added to the site investigation discussion Section 6.8.2 Recommendations for Further Investigations, Phase II ESA Recommendations of Appendix Q, Hazardous Materials Discipline Report, of the Final EIS. As stated in Appendix Q, Attachment H-1, focused environmental sampling at Terminal 46 may be performed in conjunction with geotechnical design. The only Port property identified for investigation is part of Terminal 46 that would be acquired for tie-backs. No remediation is anticipated. As stated in Section 6.8.2, investigations will be coordinated with the property owner.

L-006-033

Your comments are noted. Please see the Final EIS for the current construction plan for each build alternative, discussion of the expected construction effects, and presentation of proposed mitigation measures to address project effects.

L-006-034

When the Draft EIS was issued, construction planning was at a very early and conceptual stage. The analysis has advanced substantially since that time, and an evaluation of the effects of the Broad Street Detour that is part of the construction approach used with the Elevated Structure Alternative, is discussed in the Final EIS. This evaluation includes more detailed traffic forecasting and operational analysis. The lead agencies recognize the importance of maintaining adequate access for the cruise ship operations at Pier 69 and will continue to coordinate with the Port of Seattle as the construction

L-006-035

- Traffic flow on regional transportation system and local arterial streets, and related socio-economic costs;
- Businesses on the waterfront, including our tenants at T-46 and Piers 66 and 69; and
- Any other trade-offs.

L-006-036

b. **Analysis of periodic SR 99 closures**

Similarly, even periodic closures as described in the DEIS —especially closures with several weeks of duration—would have a significant impact on the regional system and on our tenants along the waterfront. More substantive analysis will be needed. This includes in particular the impacts on Hanjin's operations at T-46 and cruise ships at P-66 and T-30:

- Should the corridor be closed for prolonged periods, it would be critical for freight mobility that general-purpose traffic be channeled through the Duwamish on 1st and 4th Avenues South. This would allow East Marginal Way to be dedicated to local access to adjacent properties and terminals (including the US Coast Guard), as well as to drayage operations between container terminals and the intermodal rail yards.
- Cruise ship port calls occur during the summer (between May and October) and mostly on weekends. These are the times when, according to the DEIS, periodic closures would occur. Future analysis must evaluate the impact on cruise ship operations.

L-006-037

3. **Coordination with other projects**

The DEIS contains almost no information on other projects that may be under construction at the same time. This includes the Monorail, I-5, Spokane Street and other projects on city streets, the Ferry Terminal, Sound Transit light rail, and many other projects. Constrained operation or periodic closures of SR 99 during construction will put additional pressure on an already stressed regional system. The cumulative impact of closures and detours related to any of these other projects, both within the study area and on the regional system, could be crippling. This would have a major impact on the ability of the region to do business. We encourage advance construction, fast-tracking to complete other projects in the corridor before construction starts. If that is not possible, we urge you to work with other projects to minimize the cumulative impacts associated with other projects under construction at same time. We will work with the project team to ensure that the impact on our tenants and port operations is minimized.

planning advances.

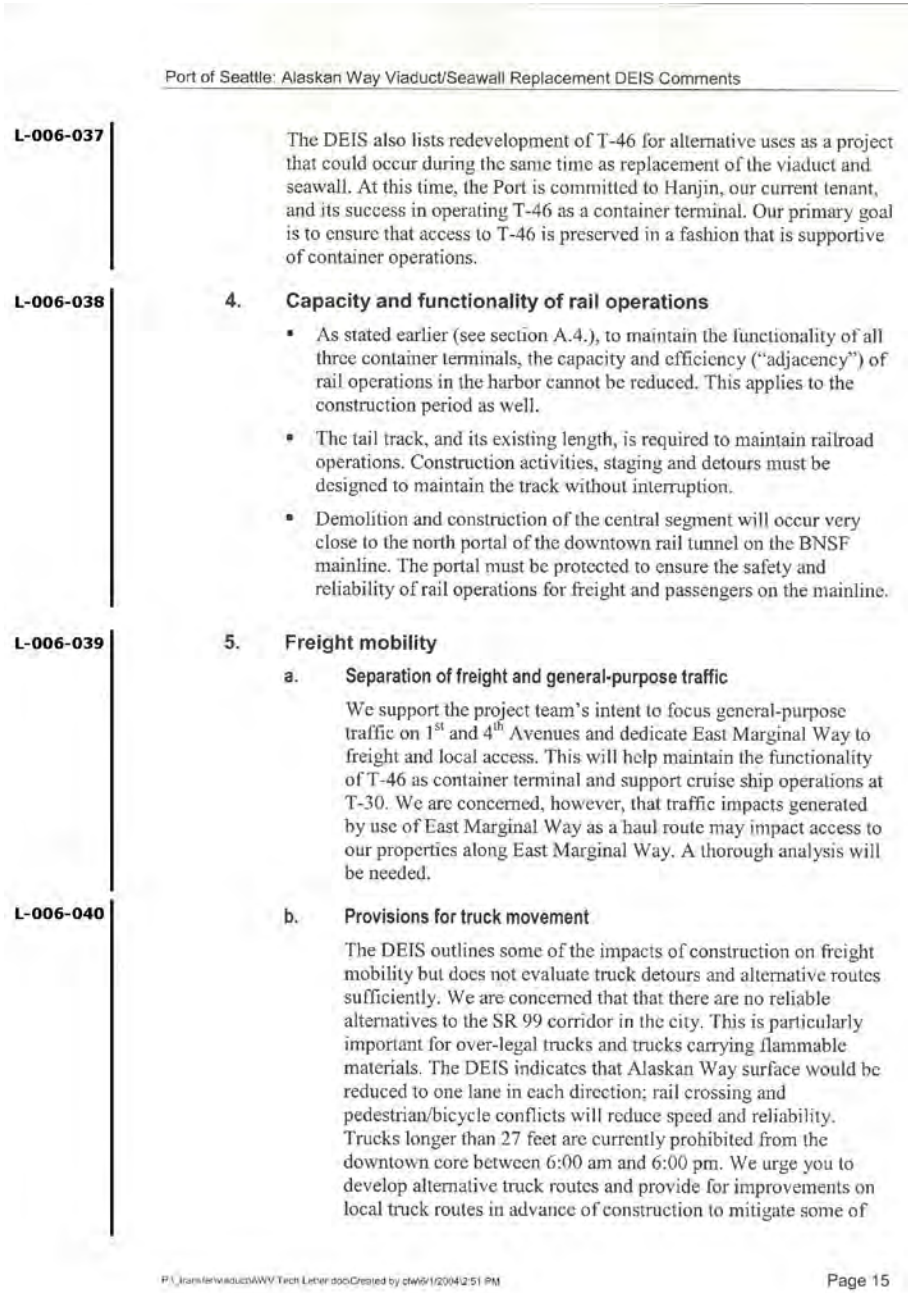
The Battery Street Flyover Detour has been eliminated from further consideration.

L-006-035

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

L-006-036

A detailed analysis of traffic operations during the construction period is included in the Final EIS for the alternatives. As noted in your comment, the 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing



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L-006-037

The DEIS also lists redevelopment of T-46 for alternative uses as a project that could occur during the same time as replacement of the viaduct and seawall. At this time, the Port is committed to Hanjin, our current tenant, and its success in operating T-46 as a container terminal. Our primary goal is to ensure that access to T-46 is preserved in a fashion that is supportive of container operations.

L-006-038

4. **Capacity and functionality of rail operations**

- As stated earlier (see section A.4.), to maintain the functionality of all three container terminals, the capacity and efficiency ("adjacency") of rail operations in the harbor cannot be reduced. This applies to the construction period as well.
- The tail track, and its existing length, is required to maintain railroad operations. Construction activities, staging and detours must be designed to maintain the track without interruption.
- Demolition and construction of the central segment will occur very close to the north portal of the downtown rail tunnel on the BNSF mainline. The portal must be protected to ensure the safety and reliability of rail operations for freight and passengers on the mainline.

L-006-039

5. **Freight mobility**

a. **Separation of freight and general-purpose traffic**

We support the project team's intent to focus general-purpose traffic on 1st and 4th Avenues and dedicate East Marginal Way to freight and local access. This will help maintain the functionality of T-46 as container terminal and support cruise ship operations at T-30. We are concerned, however, that traffic impacts generated by use of East Marginal Way as a haul route may impact access to our properties along East Marginal Way. A thorough analysis will be needed.

L-006-040

b. **Provisions for truck movement**

The DEIS outlines some of the impacts of construction on freight mobility but does not evaluate truck detours and alternative routes sufficiently. We are concerned that that there are no reliable alternatives to the SR 99 corridor in the city. This is particularly important for over-legal trucks and trucks carrying flammable materials. The DEIS indicates that Alaskan Way surface would be reduced to one lane in each direction; rail crossing and pedestrian/bicycle conflicts will reduce speed and reliability. Trucks longer than 27 feet are currently prohibited from the downtown core between 6:00 am and 6:00 pm. We urge you to develop alternative truck routes and provide for improvements on local truck routes in advance of construction to mitigate some of

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the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

In the current construction plans for the build alternatives, freight movements are emphasized on East Marginal Way, and general-purpose traffic and transit are largely directed to First Avenue, Fourth Avenue, and other corridors to the east. Throughout the construction period, local access will be maintained to the cruise ship terminals.

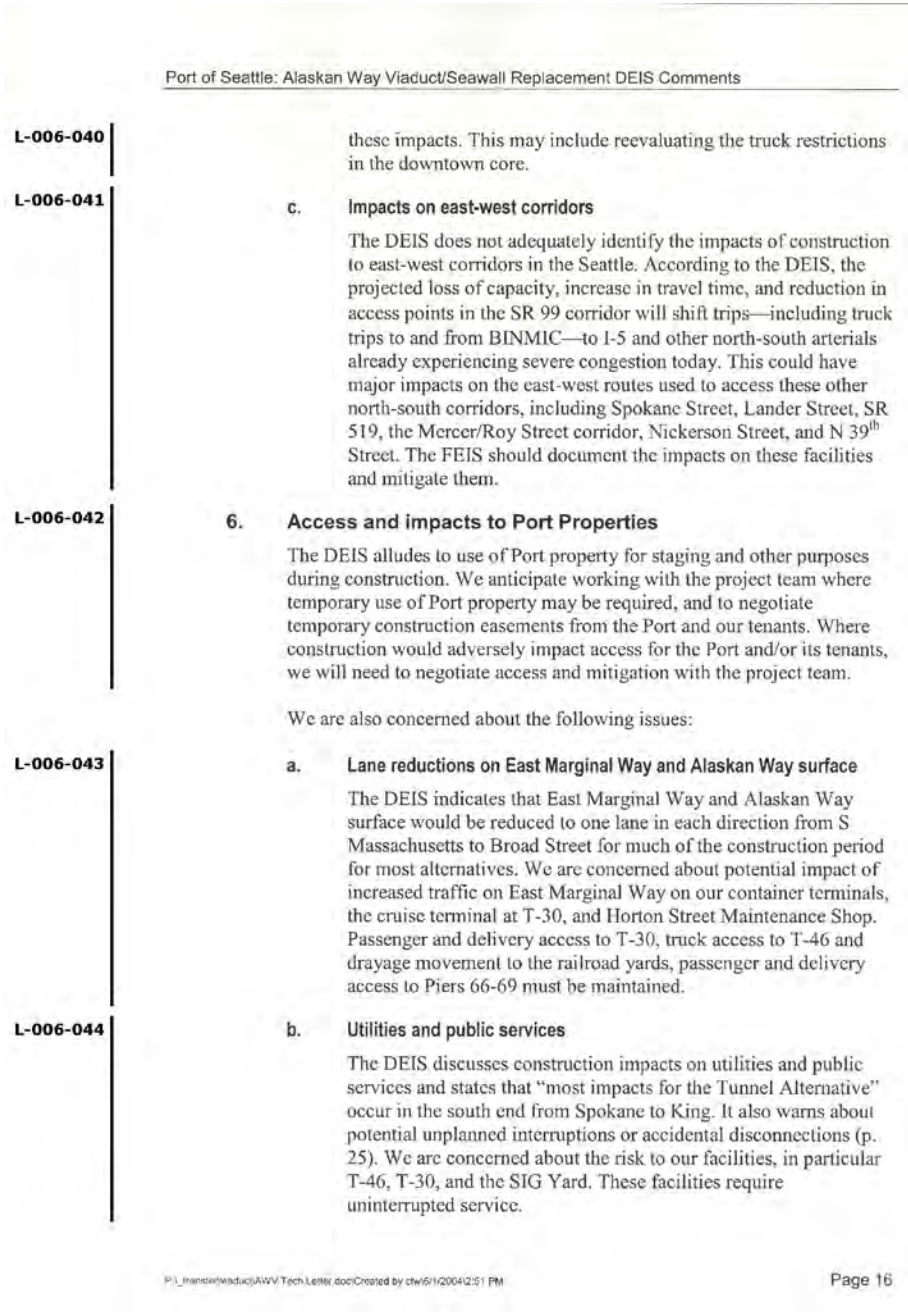
L-006-037

The Final EIS describes the cumulative and secondary impacts of the Alaskan Way Viaduct Replacement Project. It also discusses the specific projects that are likely to be under construction during some portion of the project's construction period and are likely to be affected by the project's periodic and longer-term closures of SR 99 and potential detours through the corridor. Also discussed is the ongoing coordination that is occurring now and will continue during construction to minimize the cumulative and secondary impacts that are expected.

A detailed description of the proposed traffic mitigation measures can be found in Appendix C, Transportation Discipline Report, of the Final EIS.

L-006-038

The project team has coordinated continuously with the Port of Seattle to



Port of Seattle: Alaskan Way Viaduct/Seawall Replacement DEIS Comments

L-006-040

these impacts. This may include reevaluating the truck restrictions in the downtown core.

L-006-041

c. **Impacts on east-west corridors**

The DEIS does not adequately identify the impacts of construction to east-west corridors in the Seattle. According to the DEIS, the projected loss of capacity, increase in travel time, and reduction in access points in the SR 99 corridor will shift trips—including truck trips to and from BINMIC—to I-5 and other north-south arterials already experiencing severe congestion today. This could have major impacts on the east-west routes used to access these other north-south corridors, including Spokane Street, Lander Street, SR 519, the Mercer/Roy Street corridor, Nickerson Street, and N 39th Street. The FEIS should document the impacts on these facilities and mitigate them.

L-006-042

6. **Access and impacts to Port Properties**

The DEIS alludes to use of Port property for staging and other purposes during construction. We anticipate working with the project team where temporary use of Port property may be required, and to negotiate temporary construction easements from the Port and our tenants. Where construction would adversely impact access for the Port and/or its tenants, we will need to negotiate access and mitigation with the project team.

We are also concerned about the following issues:

L-006-043

a. **Lane reductions on East Marginal Way and Alaskan Way surface**

The DEIS indicates that East Marginal Way and Alaskan Way surface would be reduced to one lane in each direction from S Massachusetts to Broad Street for much of the construction period for most alternatives. We are concerned about potential impact of increased traffic on East Marginal Way on our container terminals, the cruise terminal at T-30, and Horton Street Maintenance Shop. Passenger and delivery access to T-30, truck access to T-46 and drayage movement to the railroad yards, passenger and delivery access to Piers 66-69 must be maintained.

L-006-044

b. **Utilities and public services**

The DEIS discusses construction impacts on utilities and public services and states that "most impacts for the Tunnel Alternative" occur in the south end from Spokane to King. It also warns about potential unplanned interruptions or accidental disconnections (p. 25). We are concerned about the risk to our facilities, in particular T-46, T-30, and the SIG Yard. These facilities require uninterrupted service.

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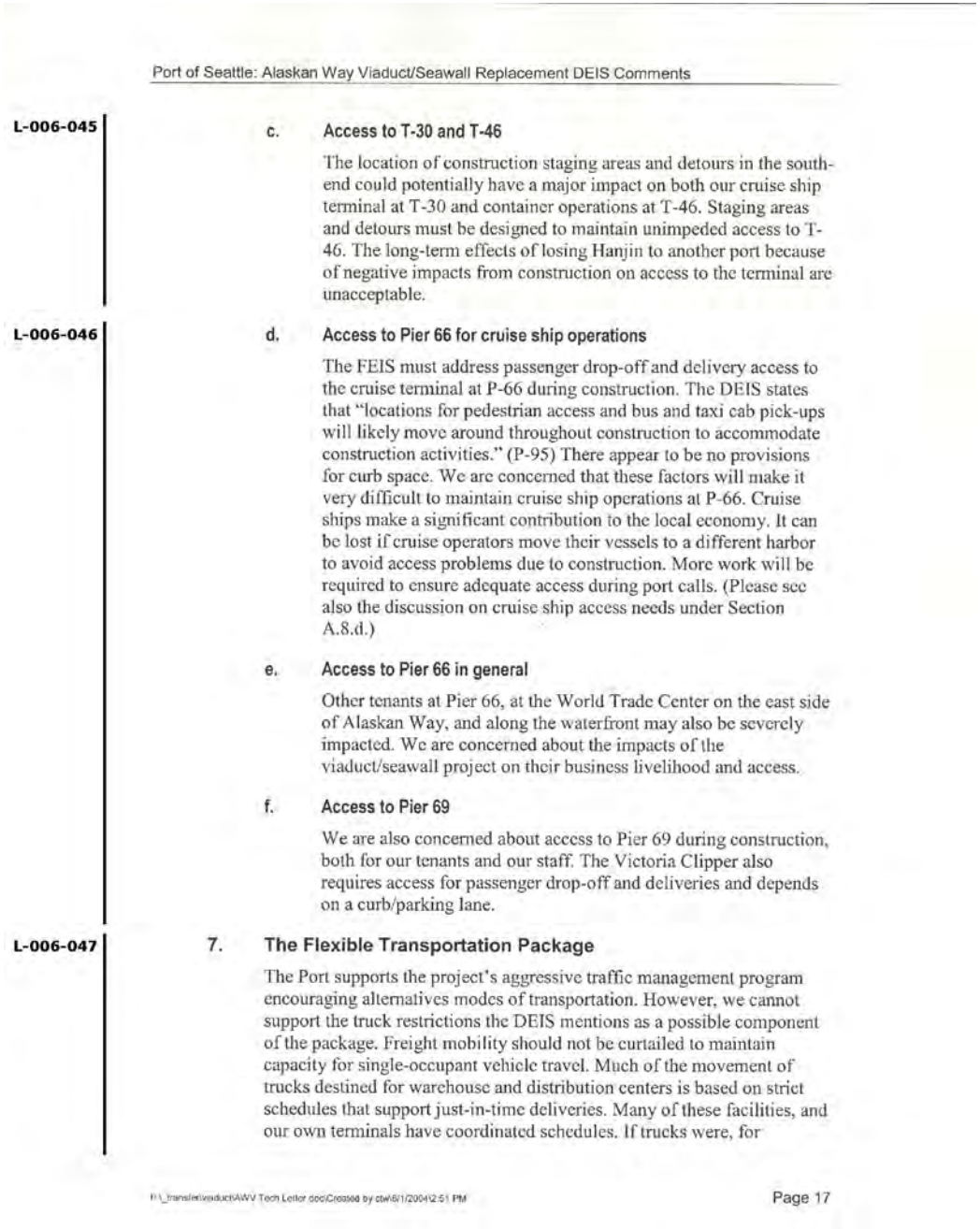
to minimize both short- and long-term effects on freight rail operations and container terminal access. The Port of Seattle and other stakeholders have been directly involved in design efforts not only for the current alternatives analyzed in the 2011 Final EIS, but for the S. Holgate Street to S. King Street Viaduct Replacement Project which provides an aerial overcrossing at S. Atlantic street to accommodate east-west traffic flow when rail cars block the at-grade roadway. This project also provides an aerial connection with East Marginal Way S., allowing for increased north-south mobility through the project area.

The project design team is currently coordinating with the Port of Seattle as the design and construction planning becomes more defined.

L-006-039

In the south sub-area, the primary construction material haul route would likely use the area around the southbound WOSCA detour off-ramp to S. Atlantic Street. Southbound haul egress would be provided on the existing ramp (which connects to the WOSCA detour). Northbound ingress would feature a temporary adjoining roadway from S. Atlantic Street connecting to the southbound on-ramp at about S. Charles Street. Over-legal loads to the south end of the project area would likely travel via SR 599 to First Avenue S. to the job site. Over-legal loads traveling within the city are required to obtain a special permit, and appropriate routes are selected via the permit approval process.

Alternate routes to port facilities along the waterfront would be via Alaskan Way or exit at S. Spokane Street. Northbound trucks on East Marginal Way S. would be required to use S. Atlantic Street and the East Frontage Road (or First Avenue S.) because Alaskan Way S. would be closed from S. Atlantic Street to S. King Street. A northbound on-ramp to SR 99 would be provided at the S. Royal Brougham/East Frontage Road intersection. A more in-depth discussion of mobility, including freight, is provided in Appendix C, Transportation Discipline Report.



Port of Seattle: Alaskan Way Viaduct/Seawall Replacement DEIS Comments

L-006-045

c. **Access to T-30 and T-46**

The location of construction staging areas and detours in the south-end could potentially have a major impact on both our cruise ship terminal at T-30 and container operations at T-46. Staging areas and detours must be designed to maintain unimpeded access to T-46. The long-term effects of losing Hanjin to another port because of negative impacts from construction on access to the terminal are unacceptable.

L-006-046

d. **Access to Pier 66 for cruise ship operations**

The FEIS must address passenger drop-off and delivery access to the cruise terminal at P-66 during construction. The DEIS states that "locations for pedestrian access and bus and taxi cab pick-ups will likely move around throughout construction to accommodate construction activities." (P-95) There appear to be no provisions for curb space. We are concerned that these factors will make it very difficult to maintain cruise ship operations at P-66. Cruise ships make a significant contribution to the local economy. It can be lost if cruise operators move their vessels to a different harbor to avoid access problems due to construction. More work will be required to ensure adequate access during port calls. (Please see also the discussion on cruise ship access needs under Section A.8.d.)

e. **Access to Pier 66 in general**

Other tenants at Pier 66, at the World Trade Center on the east side of Alaskan Way, and along the waterfront may also be severely impacted. We are concerned about the impacts of the viaduct/seawall project on their business livelihood and access.

f. **Access to Pier 69**

We are also concerned about access to Pier 69 during construction, both for our tenants and our staff. The Victoria Clipper also requires access for passenger drop-off and deliveries and depends on a curb/parking lane.

L-006-047

7. **The Flexible Transportation Package**

The Port supports the project's aggressive traffic management program encouraging alternatives modes of transportation. However, we cannot support the truck restrictions the DEIS mentions as a possible component of the package. Freight mobility should not be curtailed to maintain capacity for single-occupant vehicle travel. Much of the movement of trucks destined for warehouse and distribution centers is based on strict schedules that support just-in-time deliveries. Many of these facilities, and our own terminals have coordinated schedules. If trucks were, for

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L-006-040

The project team is committed to working with the Port and the freight community to develop alternative freight routes and strategies to address freight concerns during the construction period. Additionally, WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

L-006-041

Additional traffic analysis has been completed specifically targeting construction-related impacts, including impacts to east-west arterials. The results of this analysis, plus a list of mitigation measures for reducing travel demand and traffic congestion on key freight routes, are included in Appendix C, Transportation Discipline Report, of the Final EIS.

L-006-042

The lead agencies will coordinate staging activities and the use of affected properties with individual property owners prior to construction. This coordination will include negotiations for potential easements, temporary uses of parcel areas, and access needs for each affected property.

L-006-043

The project team is committed to work with the Port and the freight community to develop strategies to maintain access into and out of the port terminal facilities. To help reduce congestion on East Marginal Way, the project is proposing that this roadway be open only for freight and construction-related traffic (haul route).

Further details about the performance of the Bored Tunnel Alternative (preferred alternative) and construction mitigation measures can be found in the Final EIS Appendix C, Transportation Discipline Report.

L-006-047

example, forced to operate at night, a significant portion of the supply chain would be forced to change hours of operation as well. We are also concerned that the mode split that is assumed for the construction period may not be achievable. We encourage the project team to more thoroughly evaluate this issue and will work with the team to develop a package that provides for adequate freight movement for inclusion in the FEIS.

L-006-048

8. **Environmental issues**

a. Air quality

- The DEIS correctly notes the current attainment status of the region, however, this area has come close to violating the National Ambient Air Quality Standards for ozone and particulate matter during adverse weather events. Increased $PM_{2.5}$ emissions due to diesel construction equipment and traffic congestion could jeopardize the region's attainment status.
- Emissions from construction could leave little room in the airshed for other projects. The project must mitigate adverse construction impacts as necessary to allow for development of other projects given constraints in the region's air quality.
- The FEIS should address cumulative impacts of construction related tailpipe and fugitive emissions from concurrent projects and from increased congestion and should evaluate air toxics impacts of construction. It should also include mitigation to address adverse impacts, including phasing where possible.
- We endorse minimizing diesel particulate emissions as described on Page 72 of Appendix F. A design that does not improve the current and projected no build levels of service will most likely compromise air quality in the future unless provision and use of adequate transportation alternatives coupled with VMT-reducing land use decisions are assured.
- Vehicular emissions estimates seem to assume emissions are all re-entrained road dust (Page 21, Appendix Q). The analysis does not take into account primary particulates from the vehicles nor emissions of NOx and SOx that contribute to secondary nitrate and sulfate PM10 in ambient air.
- The magnitude of the construction emissions and emissions from traffic congestion during construction are essential to the cumulative impact analyses, which should include a scenario that gives less weight to voluntary traffic reduction. We request review and comment of these analyses before they are final.

L-006-044

The comment has been noted that maintaining uninterrupted service to Port of Seattle container yards T-30 and T-46 and the SIG railyard is very important. Please see the Final EIS and Appendix K, Public Services and Utilities Discipline Report, for current project information about how construction of each build alternative could affect public services and utilities and what mitigation measures are proposed to avoid or minimize the effects.

L-006-045

The project team recognizes the importance of maintaining access to the Port of Seattle terminals during the construction period and for the longer term, even though the Port cruise ship terminal has been moved north to Terminal 91, further from the potential construction staging areas and construction detours. It is the policy of the project to maintain access to all Port facilities during project construction.

The project team continues to work with the Port of Seattle to understand access needs and take steps to accommodate them in the best manner possible as more detail on construction staging and project phasing become available.

L-006-046

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.

L-006-049

b. Noise

We are concerned about the impacts of construction noise on Terminal 46, Pier 48, Pier 66 and the World Trade Center, and Pier 69. Should noise from construction activities impact existing uses at these or other facilities owned by Port, the project would need to provide mitigation.

Thank you again for the opportunity to participate in this project and comment on this Draft Environmental Impact Statement. We look forward to continuing work with your project team to define and fund a project that will replace the SR 99 Viaduct and the City's aging seawall. Please do not hesitate to contact me at 206-728-3818, or Christine Wolf, our new Regional Transportation Program Planner for the Seaport, at 206-728-3458, if you have any questions.

Sincerely,

Stephanie Jones, PE, AICP
Manager
Seaport Strategic Planning and Policy
Port of Seattle

L-006-047

The project team is committed to working with the freight community to explore opportunities to mitigate construction related impacts.

Since the publication of the Draft EIS, the project team has continuously worked with the Port and members of the freight community to ensure their interests are heard and reflected in the transportation planning process for construction. Measures for managing mobility and access for freight during construction are found in the Final EIS Appendix C, Transportation Discipline Report. In addition, WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

L-006-048

Since the publication of the Draft EIS, the project area has been reclassified as in attainment for ozone. The revised PM10 analysis conducted for the Final EIS follows FHWA's guidance for qualitative hot-spot analyses. Under this approach, the quantitative estimation of emissions is not necessary. Please see the current air quality analysis for this project in Appendix M, Air Discipline Report, of the Final EIS.

A Memorandum of Agreement (MOA) is in place between WSDOT and the Puget Sound Clean Air Agency (PSCAA) to help eliminate, confine, or reduce construction period emissions for many larger and longer term projects in Washington State. This MOA would apply to the Alaskan Way Viaduct Replacement Project. Mitigation measures during construction of the project are shown in Appendix M of the Final EIS.

L-006-049

Project noise effects and proposed mitigation measures are described in the Final EIS and Appendix F, Noise Discipline Report.