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PUGET SOUND ENERGY

Puget Sound Energy, Inc.
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June 1, 2004

Ms. Allison Ray
WSDOT
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

Re: Comments on Alaskan Way Viaduct Draft Environmental Impact Statement (DEIS)

Dear Ms. Ray.

Puget Sound Energy (PSE) appreciates the opportunity to provide comments on the Alaskan Way Viaduct and Seawall Replacement Project DEIS. PSE is the largest energy supplier (natural gas and electricity) in the State of Washington. We provide natural gas services to approximately 110,000 customers within the City of Seattle. PSE has a gas service base of almost 650,000 customers in six counties.

PSE recognizes that the Alaskan Way Viaduct and Seawall Replacement Project is an extraordinary undertaking with national and regional significance. PSE strives to maintain a positive, professional and productive relationship with all the customers we serve. The relationships we have with the City of Seattle, WA State Department of Transportation (WSDOT) and USDOT's Federal Highway Administration (FHWA) are extremely important to PSE. We view these partnerships as critical to executing the work on the Viaduct and providing safe, reliable, efficient and cost-effective energy services to our customers. We support the work of these entities and the various stakeholder groups working to accomplish this project.

As part of PSE's service obligation, we are required to maintain and reinforce our natural gas system as the need arises. New growth increases demand for energy services and associated infrastructure, while decreasing available space for utility infrastructure creates hardships on our system. As part of any major transportation project requiring utility relocation, PSE must have the ability to access and maintain safe, immediate and reliable service to our customers. To do otherwise puts the reliability of our natural gas system, the general public, and our customers at risk.

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

Puget Sound Energy has natural gas mains, services and a supply line located under and directly proximate to the Viaduct. A 12" diameter natural gas supply pipeline serves PSE customers throughout Seattle and in other parts of King and Snohomish counties. Multiple other distribution lines serve Seattle businesses and households along the waterfront and neighboring areas. PSE has no facilities attached to the Viaduct

structure. When construction begins on a Viaduct replacement it is our understanding that some or all of our facilities may need to be relocated once or multiple times depending upon which replacement alternative is selected. Based upon the replacement options, here are some of PSE's specific comments regarding the DEIS:

B-001-001

1. There are many alternatives as part of this DEIS process. PSE relocation engineering will not begin until a preferred alternative is selected due to the myriad of design alternatives. After the selection of a preferred alternative, PSE will need adequate time to perform engineering duties.

B-001-002

2. PSE recommends the use of a master permit system to jointly permit all utilities so any potential permitting issues do not delay the overall project schedule.

B-001-003

3. Projects of regional significance need to address all project impacts. Utility relocation costs are a construction impact for both public and private utilities and should be included in the estimated project cost for purposes of evaluating alternatives and making public policy decisions. Moreover, environmental impacts resulting from utility relocation activities should be evaluated in this EIS, as this work relies solely on the Viaduct replacement as their justification and any replacement cannot go forward until utilities are relocated. They are in effect, a single course of action.

B-001-004

4. PSE and other private utility customers should not be expected to subsidize project construction costs, which result from a series of construction impacts that occur over time. This would place an unfair burden of natural gas utility relocation costs upon PSE customers.

B-001-005

5. Project work sequence, schedule and construction methods should be considered and designed to avoid multiple relocations of existing utilities.

B-001-006

6. PSE facilities need to be properly supported and protected during construction. Drilling, pile driving and other construction activities, including improving or excavating soil, also will need to be assessed in order to protect any existing natural gas facilities during construction for safety purposes. To prevent impacts to utilities and as a mitigation measure, PSE should be included in the construction planning process, especially to determine the need to have a representative on site when work occurs near our facilities.

B-001-007

7. PSE will need to perform normal utility maintenance activities on its facilities before, during and after any required pipeline relocations that should be considered when determining final location of facilities. Compliance with standards will need to be considered in the utility design phase of the project, including depth and separation of facilities, especially from other utilities.

B-001-008

8. Utility relocation plans should place a high priority on continuity and uninterrupted service to existing customers. For example, on the waterfront, PSE currently serves approximately 50 commercial customers with natural gas lines that are attached under the existing piers. Additionally, PSE's 12" diameter supply pipeline within the proposed project area cannot be disconnected for relocation work due to PSE's regulatory obligations to provide continued service to

2

B-001-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. The Final EIS evaluates three build alternatives: Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure Alternatives. 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.

Construction activities within each traffic stage are summarized in the Final EIS Appendix B, Alternatives Description and Construction Methods Discipline Report.

The project will continue to coordinate closely with all of the utility providers, both public and private.

B-001-002

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

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

B-001-003

Potential utility relocations are discussed in Chapter 6 of the Final EIS

B-001-008 customers. PSE requests that the lead agencies include this issue when developing their final utility relocation plan.

B-001-009 9. Coordination of utility relocations is part of the critical path for any of the five alternative Viaduct replacement projects. All relocations should be engineered smartly and efficiently in concert with the project calendar. Ongoing coordination and communication could be key to achieving project milestones. The FEIS should include preparation of a master utility relocation plan as a mitigation measure or significant, unavoidable, adverse impacts could occur to utilities.

B-001-010 10. As a result of this project, PSE may need to relocate and restore services on private property associated with this work. Any final utility plan should reflect this issue.

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

Sincerely,

SBHempstead

Susan Hempstead
Local Government & Community Relations Manager
PUGET SOUND ENERGY

3

Appendix K, Public Services and Utilities Discipline Report.

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

B-001-004

The lead agencies do not expect private utilities to subsidize project construction costs. The responsibility of private utilities located within public rights of way has been clearly defined by law and in the courts. Fulfilling that responsibility does not constitute a subsidy. The lead agencies have coordinated directly with Puget Sound Energy over time on construction planning and will work to minimize project effects as is practical and feasible.

B-001-005

The project's proposed construction sequencing, schedule, and construction methods for the alternatives are discussed in the Final EIS Appendix B, Alternatives Description and Construction Methods Discipline Report. The development of the utility plans has occurred with input resulting from ongoing coordination with both the private and public utility providers to reduce the number of utility relocations to the extent possible.

B-001-006

The utility design has been developed with extensive coordination between the utility providers and the utility engineers. PSE has

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

B-001-007

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

B-001-008

The need for continuous operation of utility lines to existing customers is a baseline consideration in the development of utility relocation plans. PSE and other affected utility providers have been and will be included in the coordination and development of utility relocation plans through meetings, e-mail with staff, and discussions relating to standards criteria. PSE and other utility providers will continue to be involved in design and construction issues as the design plans proceed.

B-001-009

A consolidated utility relocation plan is listed in Final EIS Appendix K, Public Services and Utilities as a potential measure to mitigate the effects of the utility relocation process. PSE and other affected utility providers have been and will be included in the coordination and development of utility relocation plans through meetings, e-mail with staff, and discussions relating to standards criteria. PSE and other utility providers will continue to be involved in design and construction issues as the design plans proceed.

B-001-010

The project design team will complete the design of the project to a 30 percent to 60 percent design level, including the identification of affected utilities. As part of the design process, the design team will notify each potentially affected utility that relocation or other protection measures for their facilities will be required. A final utility relocation plan will be developed with the assistance of the affected utilities. However, each utility will be responsible for the final design and construction of the relocations or protection measures required for their facilities. As part of that effort, private utilities will be responsible for identifying and procuring any operating rights, easements, or franchise rights necessary to adjust their facilities.