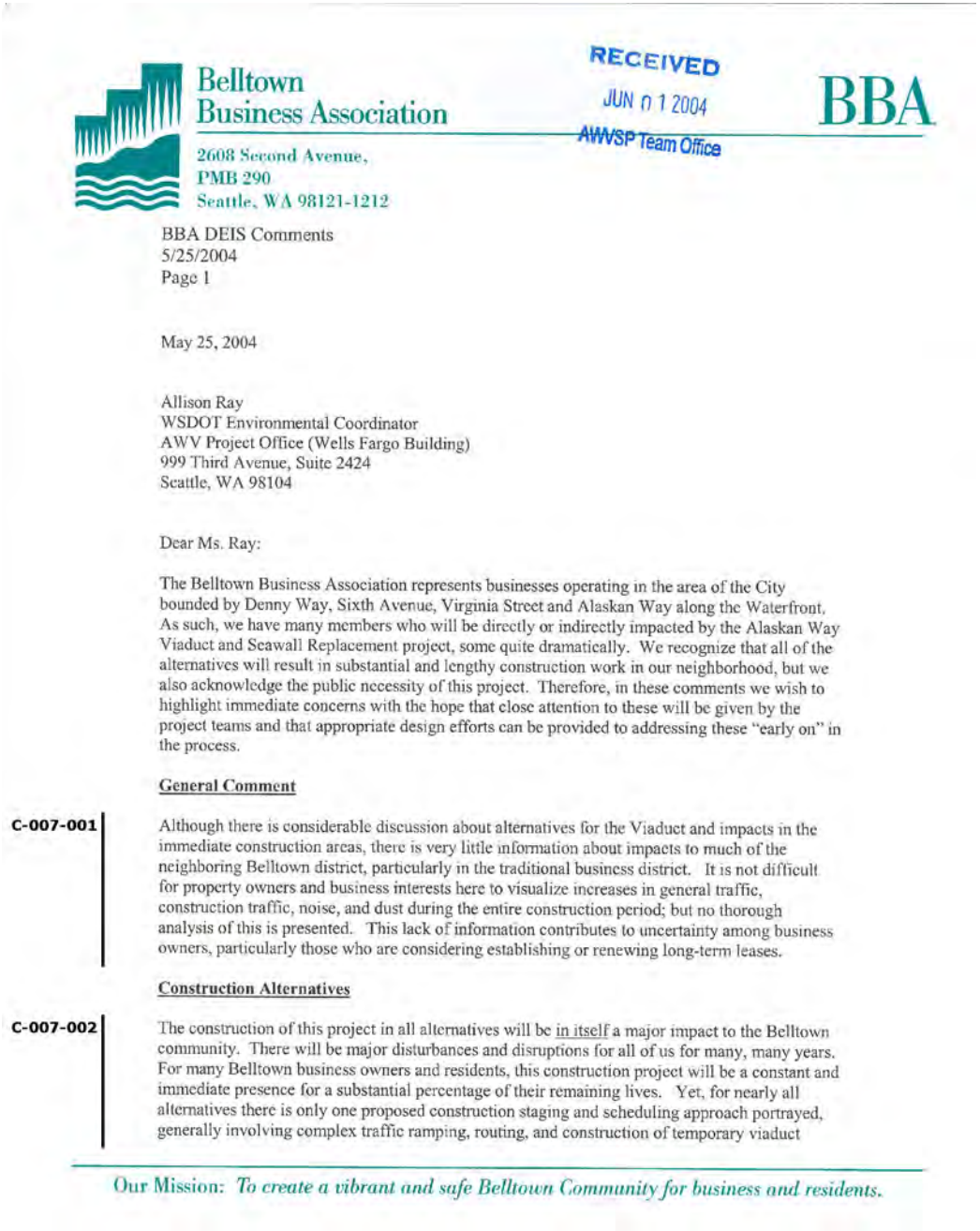

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May 25, 2004

Allison Ray
WSDOT Environmental Coordinator
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Ray:

The Belltown Business Association represents businesses operating in the area of the City bounded by Denny Way, Sixth Avenue, Virginia Street and Alaskan Way along the Waterfront. As such, we have many members who will be directly or indirectly impacted by the Alaskan Way Viaduct and Seawall Replacement project, some quite dramatically. We recognize that all of the alternatives will result in substantial and lengthy construction work in our neighborhood, but we also acknowledge the public necessity of this project. Therefore, in these comments we wish to highlight immediate concerns with the hope that close attention to these will be given by the project teams and that appropriate design efforts can be provided to addressing these "early on" in the process.

General Comment

C-007-001

Although there is considerable discussion about alternatives for the Viaduct and impacts in the immediate construction areas, there is very little information about impacts to much of the neighboring Belltown district, particularly in the traditional business district. It is not difficult for property owners and business interests here to visualize increases in general traffic, construction traffic, noise, and dust during the entire construction period; but no thorough analysis of this is presented. This lack of information contributes to uncertainty among business owners, particularly those who are considering establishing or renewing long-term leases.

Construction Alternatives

C-007-002

The construction of this project in all alternatives will be in itself a major impact to the Belltown community. There will be major disturbances and disruptions for all of us for many, many years. For many Belltown business owners and residents, this construction project will be a constant and immediate presence for a substantial percentage of their remaining lives. Yet, for nearly all alternatives there is only one proposed construction staging and scheduling approach portrayed, generally involving complex traffic ramping, routing, and construction of temporary viaduct

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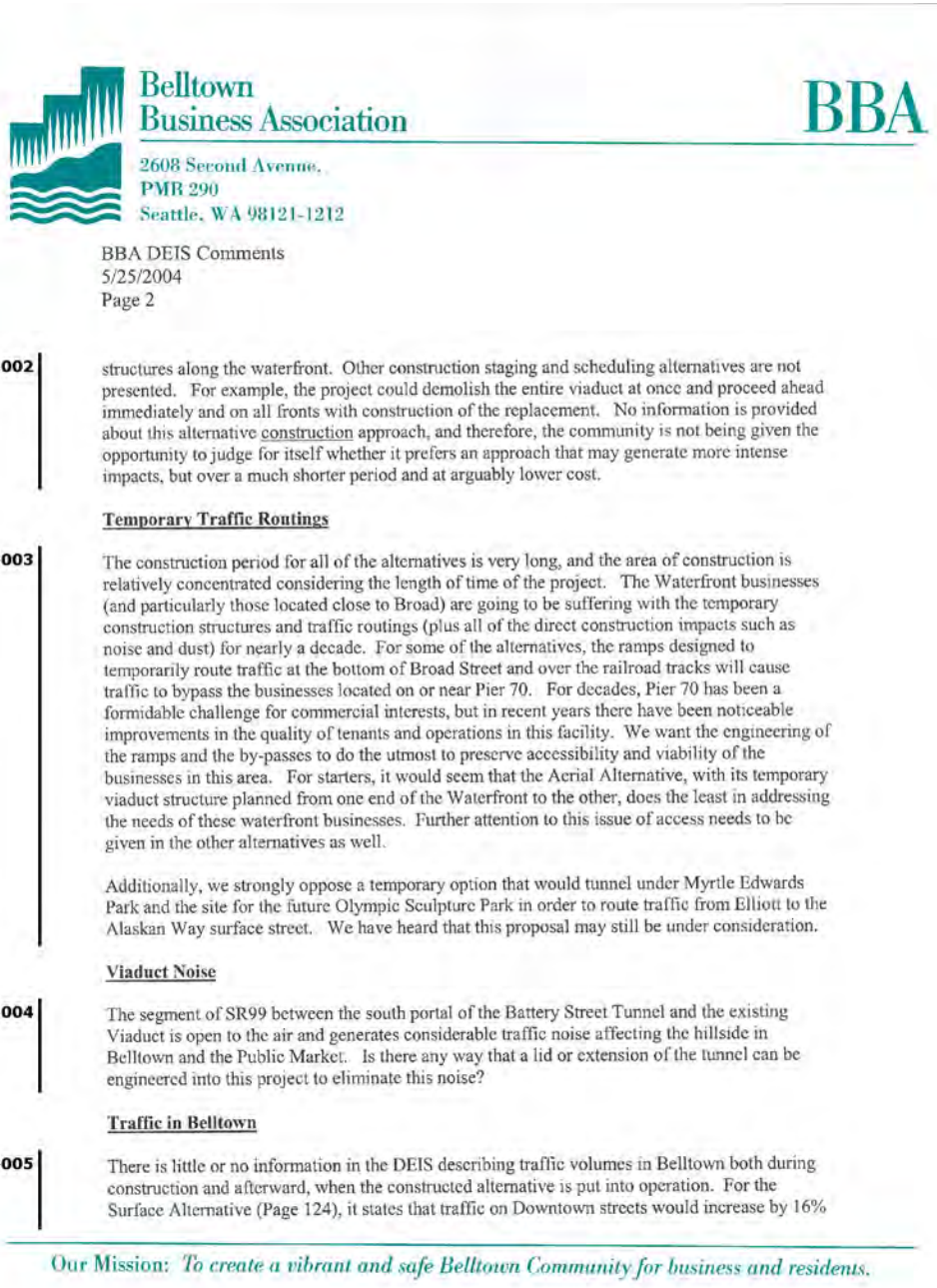
C-007-001

Since the 2004 Draft EIS, the alternatives and construction approaches have been further developed as described in the 2006 Supplemental Draft EIS and the Final EIS. Potential impacts from the alternatives on the Belltown area, such as increases in traffic, noise, and dust during construction are described in the Final EIS Appendix C, Transportation Discipline Report; Appendix F, Noise Discipline Report; Appendix M, Air Discipline Report; and Appendix L, Economics Discipline Report. In addition, Appendix H, Social Discipline Report, describes potential effects on various social elements of the Belltown neighborhood.

Coordination with the Belltown neighborhood is ongoing. Outreach meetings have been conducted with several businesses regarding the potential for economic and other construction or operational impacts. Coordination will continue through the construction phase of the project.

C-007-002

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



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C-007-002

structures along the waterfront. Other construction staging and scheduling alternatives are not presented. For example, the project could demolish the entire viaduct at once and proceed ahead immediately and on all fronts with construction of the replacement. No information is provided about this alternative construction approach, and therefore, the community is not being given the opportunity to judge for itself whether it prefers an approach that may generate more intense impacts, but over a much shorter period and at arguably lower cost.

Temporary Traffic Routings

C-007-003

The construction period for all of the alternatives is very long, and the area of construction is relatively concentrated considering the length of time of the project. The Waterfront businesses (and particularly those located close to Broad) are going to be suffering with the temporary construction structures and traffic routings (plus all of the direct construction impacts such as noise and dust) for nearly a decade. For some of the alternatives, the ramps designed to temporarily route traffic at the bottom of Broad Street and over the railroad tracks will cause traffic to bypass the businesses located on or near Pier 70. For decades, Pier 70 has been a formidable challenge for commercial interests, but in recent years there have been noticeable improvements in the quality of tenants and operations in this facility. We want the engineering of the ramps and the by-passes to do the utmost to preserve accessibility and viability of the businesses in this area. For starters, it would seem that the Aerial Alternative, with its temporary viaduct structure planned from one end of the Waterfront to the other, does the least in addressing the needs of these waterfront businesses. Further attention to this issue of access needs to be given in the other alternatives as well.

Additionally, we strongly oppose a temporary option that would tunnel under Myrtle Edwards Park and the site for the future Olympic Sculpture Park in order to route traffic from Elliott to the Alaskan Way surface street. We have heard that this proposal may still be under consideration.

Viaduct Noise

C-007-004

The segment of SR99 between the south portal of the Battery Street Tunnel and the existing Viaduct is open to the air and generates considerable traffic noise affecting the hillside in Belltown and the Public Market. Is there any way that a lid or extension of the tunnel can be engineered into this project to eliminate this noise?

Traffic in Belltown

C-007-005

There is little or no information in the DEIS describing traffic volumes in Belltown both during construction and afterward, when the constructed alternative is put into operation. For the Surface Alternative (Page 124), it states that traffic on Downtown streets would increase by 16%

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alternative and its construction plan, and Chapter 6 describes construction effects.

C-007-003

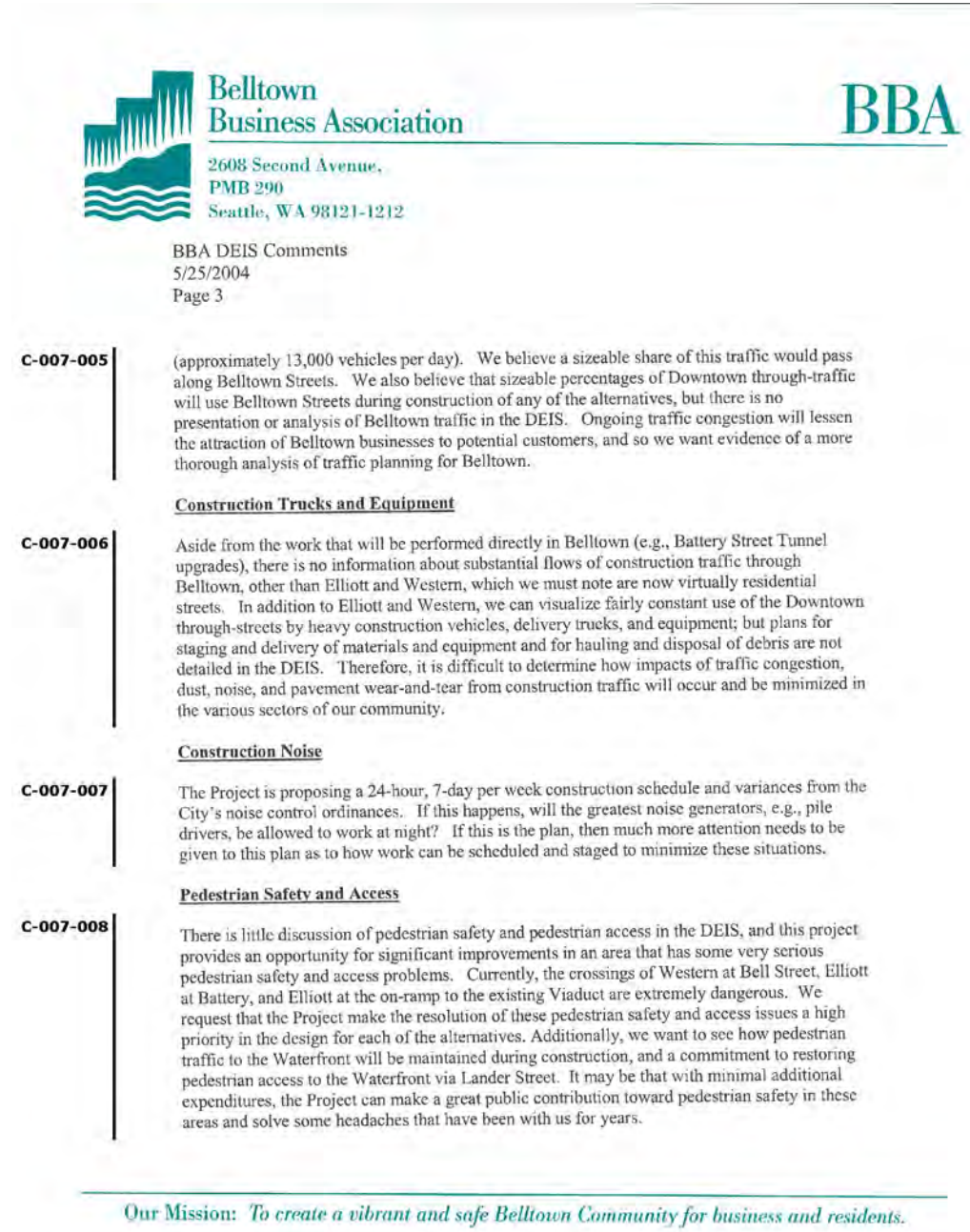
The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance 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.

The Olympic Sculpture Park is now an existing public park. The underpass at Broad Street that was analyzed in the Draft EIS is no longer being considered.

C-007-004

Traditional methods of noise mitigation, such as noise barriers and berms, are not feasible to this project due to the location and densely developed nature of the project area. The Cut-and-Cover Tunnel Alternative considers a lid in the vicinity of Victor Steinbrueck Park. This is the only lid being considered for the project. Other noise abatement methods are addressed in the Final EIS in the form of a qualitative analysis.

The majority of sensitive receptors in the Belltown area would not experience a significant change in noise levels over existing conditions compared to the preferred the Bored Tunnel Alternative.



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C-007-005

(approximately 13,000 vehicles per day). We believe a sizeable share of this traffic would pass along Belltown Streets. We also believe that sizeable percentages of Downtown through-traffic will use Belltown Streets during construction of any of the alternatives, but there is no presentation or analysis of Belltown traffic in the DEIS. Ongoing traffic congestion will lessen the attraction of Belltown businesses to potential customers, and so we want evidence of a more thorough analysis of traffic planning for Belltown.

Construction Trucks and Equipment

C-007-006

Aside from the work that will be performed directly in Belltown (e.g., Battery Street Tunnel upgrades), there is no information about substantial flows of construction traffic through Belltown, other than Elliott and Western, which we must note are now virtually residential streets. In addition to Elliott and Western, we can visualize fairly constant use of the Downtown through-streets by heavy construction vehicles, delivery trucks, and equipment; but plans for staging and delivery of materials and equipment and for hauling and disposal of debris are not detailed in the DEIS. Therefore, it is difficult to determine how impacts of traffic congestion, dust, noise, and pavement wear-and-tear from construction traffic will occur and be minimized in the various sectors of our community.

Construction Noise

C-007-007

The Project is proposing a 24-hour, 7-day per week construction schedule and variances from the City's noise control ordinances. If this happens, will the greatest noise generators, e.g., pile drivers, be allowed to work at night? If this is the plan, then much more attention needs to be given to this plan as to how work can be scheduled and staged to minimize these situations.

Pedestrian Safety and Access

C-007-008

There is little discussion of pedestrian safety and pedestrian access in the DEIS, and this project provides an opportunity for significant improvements in an area that has some very serious pedestrian safety and access problems. Currently, the crossings of Western at Bell Street, Elliott at Battery, and Elliott at the on-ramp to the existing Viaduct are extremely dangerous. We request that the Project make the resolution of these pedestrian safety and access issues a high priority in the design for each of the alternatives. Additionally, we want to see how pedestrian traffic to the Waterfront will be maintained during construction, and a commitment to restoring pedestrian access to the Waterfront via Lander Street. It may be that with minimal additional expenditures, the Project can make a great public contribution toward pedestrian safety in these areas and solve some headaches that have been with us for years.

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C-007-005

Specific effects on arterial streets during construction and operations are evaluated in the Final EIS Appendix C (Sections 5 and 6), Transportation Discipline Report.

As explained in the 2010 Supplemental Draft EIS and the Final EIS, the Surface Alternative is no longer considered as it does not meet the project's purpose and need to provide capacity to and through downtown Seattle.

C-007-006

Chapter 6 the Final EIS and Appendix C, the Transportation Discipline Report, provide information on proposed construction haul routes and also describe the temporary construction effects. Chapter 8 of the Final EIS describes mitigation measures for traffic. The City of Seattle will not allow haul routes on streets where pavement conditions could not sustain the heavier loads and trip frequencies.

C-007-007

Construction of the project will require nighttime construction activities, and the City requires a Major Public Project Construction Noise Variance. Construction noise mitigation requirements would be developed and specified in the noise variance. The Major Public Project Construction Noise Variance was presented for public comment. The Final EIS and Appendix F, Noise Discipline Report, describe construction noise effect in the project area.

C-007-008

Please refer to the Final EIS for updated information on pedestrian facilities. As noted in the Final EIS, the Bored Tunnel Alternative would remove the Elliott and Western ramps, which would contribute to improved pedestrian safety in that area. The Program would reconfigure

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Although the Viaduct and Seawall Replacement Project will present unavoidable challenges to our community, we are hoping that all concerned will work together in a spirit of cooperation and trust, and the Belltown Business Association is committed to doing that. We look forward to continuing discussion on these and other issues as the day for commencement of the project work approaches. For future communications with our organization, you may contact the chair of our Transportation Committee, Greg Schuler, at 206-268-4013 (e-mail: gschuler@antiochsea.edu).

Sincerely,

Chuck Stempler
President
Belltown Business Association

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and improve the pedestrian environment in the vicinity of the existing Elliott and Western ramps. The Cut-and-Cover Tunnel Alternative also would reconfigure that area. For the Elevated Structure Alternative, the pedestrian environment would be similar to today.

Pedestrian access would be maintained at all times during construction activities. At times, it would be necessary to reroute pedestrians using temporary facilities/detours, but these detours would be designed to minimize any inconvenience. Any pedestrian facility (e.g., sidewalk, bridge, path, etc.) that may be removed to accommodate construction activities will be replaced with a temporary facility in a nearby location. Further details regarding the specifics of pedestrian detours during construction will become available once the construction plans evolve.

S. Lander Street currently terminates at the railroad tracks (Colorado Avenue S.), which would not change with any of the alternatives evaluated for the project. There is not currently, nor would there be with the project, pedestrian access to the waterfront via Lander Street. The discussion of pedestrian safety and access has been updated in the Final EIS to reflect the work that has been done since the Draft EIS was published.