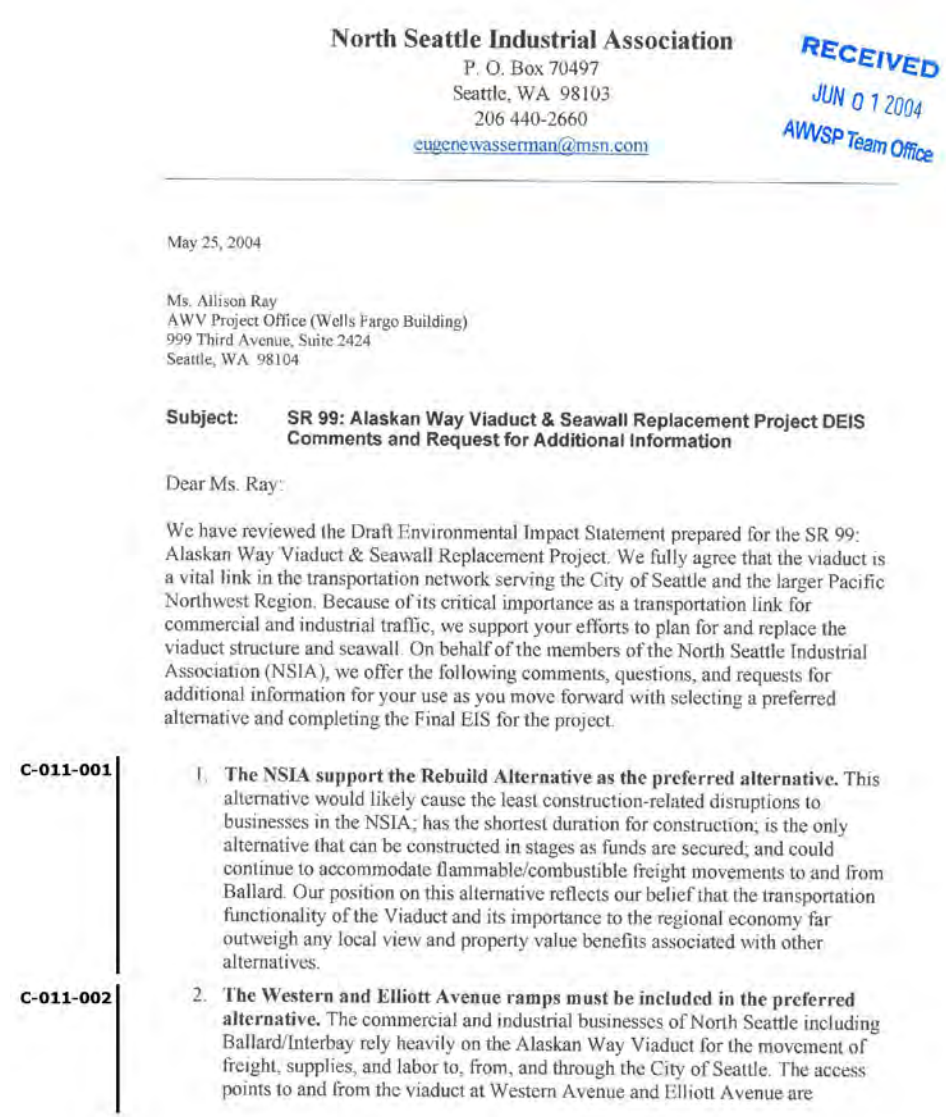

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RECEIVED
JUN 01 2004
AWVSP Team Office

May 25, 2004

Ms. Allison Ray
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104

Subject: **SR 99: Alaskan Way Viaduct & Seawall Replacement Project DEIS Comments and Request for Additional Information**

Dear Ms. Ray:

We have reviewed the Draft Environmental Impact Statement prepared for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project. We fully agree that the viaduct is a vital link in the transportation network serving the City of Seattle and the larger Pacific Northwest Region. Because of its critical importance as a transportation link for commercial and industrial traffic, we support your efforts to plan for and replace the viaduct structure and seawall. On behalf of the members of the North Seattle Industrial Association (NSIA), we offer the following comments, questions, and requests for additional information for your use as you move forward with selecting a preferred alternative and completing the Final EIS for the project.

C-011-001

1. **The NSIA support the Rebuild Alternative as the preferred alternative.** This alternative would likely cause the least construction-related disruptions to businesses in the NSIA; has the shortest duration for construction; is the only alternative that can be constructed in stages as funds are secured; and could continue to accommodate flammable/combustible freight movements to and from Ballard. Our position on this alternative reflects our belief that the transportation functionality of the Viaduct and its importance to the regional economy far outweigh any local view and property value benefits associated with other alternatives.

C-011-002

2. **The Western and Elliott Avenue ramps must be included in the preferred alternative.** The commercial and industrial businesses of North Seattle including Ballard/Interbay rely heavily on the Alaskan Way Viaduct for the movement of freight, supplies, and labor to, from, and through the City of Seattle. The access points to and from the viaduct at Western Avenue and Elliott Avenue are

C-011-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Rebuild Alternative. After studying several retrofitting concepts, the lead agencies found that rebuilding the viaduct would not be a cost-effective, long-term solution that adequately addresses the risks to public safety and the weakened state of the viaduct. Elements of the Rebuild and Aerial Alternatives were incorporated into the Elevated Structure Alternative, which was analyzed in the 2006 Supplemental Draft EIS and the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

C-011-002

Since 2004, the project has evolved (please refer to the Final EIS for updated information). The preferred Bored Tunnel Alternative would remove the Elliott and Western ramps. The connection between Alaskan Way and Elliott and Western Avenues would be constructed as a separate project. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would include ramps between SR 99 and Elliott and Western Avenues.

C-011-002

absolutely critical for the viability of these businesses. While three of the alternatives (Rebuild, Aerial, and Surface) include replacement of these access points, two of the alternatives (Tunnel and Bypass Tunnel) only include access to Elliott and Western as options. We cannot support any alternative that eliminates or significantly degrades access from the Ballard/Interbay areas to the Alaskan Way Viaduct corridor. Alternatives or options that do not fully replace access to and from Western and Elliott Avenues should be eliminated from further consideration in the FEIS.

C-011-003

3. **The FEIS should evaluate the necessity of changes in the Mercer Street corridor, in particular elimination of the Broad Street underpass.** The analysis and discussion of the north-end improvements related to Mercer Street, the closure of a portion of Broad Street, and the new Thomas Street overpass are not adequate. There is no discussion or analyses that document why these elements are included as part of the AWV and Seawall replacement project. These elements reduce critical capacity between Interstate 5 and the waterfront and also sever the only east-west "Major Truck Street" defined by the City of Seattle. As a result, significant additional discussion and analysis should be included for all alternatives that require these elements. If these elements are not critical to the defined purpose and need of the project, they should be eliminated or included only as options.

4. **The FEIS should evaluate conditions without the tunnel under the BNSF Mainline tracks near Broad Street.** All of the alternatives include reference to the Broad Street tunnel improvement to grade-separate the road from the BNSF Mainline tracks, which is being considered separately by the City of Seattle. Since this separate improvement has been demonstrated to have major operational flaws and may not be constructed, all alternatives should be analyzed assuming this grade separation project will not occur. In particular, the revised analyses should reflect the anticipated impacts to traffic destined to and from the Ballard/Interbay (BINMIC) areas. This analysis should help reinforce why the ramps at Elliott and Western Avenues are critical components to be included in a preferred alternative.

C-011-004

5. **The FEIS should document impacts to other east-west corridors in Seattle, particularly during construction.** The DEIS does not adequately document the potential impacts to major east-west arterial routes throughout Seattle for each alternative during construction. The DEIS does disclose that the potential loss in capacity, change in access points, and added travel time along the SR-99 corridor will shift trips (including truck trips from the BINMIC areas) toward the east onto Interstate 5 or other north-south Seattle arterials. The Final EIS should document the impacts of these potential shifts on the major east-west arterial routes such as Spokane Street, Lander Street, SR-519, Mercer/Roy Corridor, Nickerson Street, Leary Way, and N 39th Street. It should also identify mitigation to accommodate these impacts.

C-011-005

6. **NSIA cannot support the Surface Alternative because of its detrimental effect on traffic to and from Ballard/Interbay.** The DEIS documents that the Surface Alternative would result in a loss of capacity, additional travel delay, and congestion particularly for trips destined to and from the Ballard/Interbay

C-011-003

Because the project has evolved since comments were submitted in 2004, please see the Final EIS for updated information on the alternatives. Appendix C, Transportation Discipline Report, includes additional information on traffic and freight conditions. The Broad Street undercrossing is no longer part of the project and is not included in the Final EIS. Mercer Street would become a two-way street in the project area. The connection between Elliott and Western Avenues and Alaskan Way would be a separate project with the preferred Bored Tunnel Alternative. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would include ramps between SR 99 and Elliott and Western Avenues.

C-011-004

The Final EIS evaluates shifts in traffic and impacts to major east-west streets. Specific traffic impacts on major east-west corridors during the construction phase are documented in the Final EIS Appendix C, Transportation Discipline Report. The evaluation of construction traffic impacts defines and identifies traffic impacts in the downtown core and in neighboring areas such as Pioneer Square, Belltown, and the Stadium district. The analysis targets alternative north-south routes to the Alaskan Way Viaduct (including First Avenue, Second Avenue, etc.), as well as key east-west arterials in and around downtown.

C-011-005

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.

C-011-005

(BINMIC) areas. The results reported for the freight measure of effectiveness (MOE FT1) also indicate that connections will be degraded. A 42% increase in northbound travel time and a 70% increase in southbound travel time is forecast between the Ballard Bridge and SR-519 for this alternative. In addition, this alternative would mix truck traffic destined between the BINMIC and the Duwamish areas with significant pedestrian, bicycle, and tourism traffic along a signalized surface arterial. These are not acceptable conditions to replace the existing regional transportation facility and we cannot support this alternative.

7. **NSIA cannot support the Bypass Alternative because of its detrimental effect on traffic to and from Ballard/Interbay.** The DEIS documents that the Bypass-Tunnel Alternative would also result in a loss of capacity, additional travel delay, and congestion particularly for trips destined to and from the Ballard/Interbay (BINMIC) areas. The results reported for the freight measure of effectiveness (MOE FT1) also indicate that connections will be degraded. A 62% increase in southbound travel time is forecast between the Ballard Bridge and SR-519 for this alternative. In addition, this alternative would mix truck traffic destined between the BINMIC and the Duwamish areas with significant pedestrian, bicycle, and tourism traffic along a signalized surface arterial. These are not acceptable conditions to replace the existing regional transportation facility and we cannot support this alternative.

C-011-006

8. **The FEIS should define alternate routes for flammable and hazardous materials transport, particularly during construction AND if either the Tunnel or Bypass Tunnel Alternatives are selected.** The DEIS states that flammable and hazardous (including combustible) materials are and would continue to be prohibited in the Battery Street Tunnel for all alternatives. It also states that, for the Tunnel and Bypass-Tunnel Alternatives, flammable and hazardous materials could be prohibited in tunnel sections. Since flammable materials are currently permitted on the existing viaduct and since hazardous materials are permitted during off-peak hour, the DEIS should provide analysis and discussion about alternative routes for and impacts of removing these trips. Alternative routes should be designated and where necessary, appropriate mitigation (such as signage and turn radii improvements) should be identified.

C-011-007

9. **Construction planning must more thoroughly coordinate with other major projects, not just the Monorail project.** Page 291 of the Transportation Discipline Report notes that the Seattle monorail project is not expected to be complete until 2009 and the viaduct construction could begin in 2008. During 2008 and 2009 "there could be a short period where there are possible conflicts with project traffic detour plans and other construction processes." There could be a plethora of other transportation construction projects occurring during this period including projects on Interstate 5, City of Seattle streets, Sound Transit light rail or commuter rail lines, and the Washington State Ferries terminals. Detailed planning among all potential stakeholders should be evaluated during subsequent phases of project development to identify conflicts among all construction projects and identify appropriate mitigation strategies.

C-011-006

Transporting flammable or hazardous materials would be prohibited in the bored tunnel. Operators hauling these types of materials would need to use I-5 or Alaskan Way.

The project team is committed to working with the freight community and the City to define alternative routes and appropriate mitigation for the construction period. These are addressed 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.

C-011-007

Chapter 6 in the Final EIS discusses other major construction projects in the downtown area that may overlap with the Alaskan Way Viaduct construction schedule. Since the Draft EIS was published in 2004, the Seattle Monorail Project has been cancelled and the Seattle Ferry Terminal Project has been delayed. The Alaskan Way Viaduct Replacement Project will continue to coordinate with the other major construction projects in the area.

C-011-008

10. **The FEIS must thoroughly evaluate truck detours and alternative routes during construction.** Based on the DEIS, construction of three of the alternatives would close the Elliott Avenue/Western Avenue ramps to the SR-99 corridor for between 24 months and 114 months. The detour route for trucks along Alaskan Way would have one lane in each direction. Two of the alternatives would never replace these ramps (see comment 1 above). As pointed out in the DEIS, there are no reliable alternative routes for most trucks through Seattle. Delay, pedestrian/bicycle conflicts, and rail crossing conflicts along the Alaskan Way surface street reduce speeds and reliability for trucks along this route. Heavy congestion on I-5 persists for much of the day. Trucks larger than 27 feet are currently prohibited from Downtown Seattle streets north of King Street between 6:00 A.M. and 6:00 P.M. As a result, alternate truck routes must be designated and local truck-route improvements must be included as mitigation for construction-related impacts. The possibility of changing the downtown truck restrictions should also be evaluated.

11. **Construction should be allowed to occur 24-hours per day.** All future analyses and planning for the selected preferred alternative should continue to assume construction would occur 24-hours per day, 7-days per week. Due to the extreme hardship that construction detours and closures will cause, the construction period needs to be as short as possible. While we understand the local impacts of 24-hour construction impacts, the larger region-wide impacts of halting construction for any period of time would far outweigh the local impacts.

12. **Construction phasing should address most vulnerable sections of viaduct first.** To the extent possible, the most vulnerable sections of the viaduct structure should be replaced first. We recognize the constraints of construction phasing, and understand the current construction plans include rehabilitation of the Battery Street Tunnel early in the construction process. However, for the selected Preferred Alternative, the Final EIS should detail an alternative construction plan that would allow the project to replace those sections most vulnerable to seismic failure as early as possible.

C-011-009

13. **Economic and business losses during construction should be factored into the decision for the preferred alternative.** The cost figures provided for each alternative do not appear to account for the significant cost elements associated with the variation in construction time. Decision makers should be provided with estimates of the cost to the local economy of each alternative's construction impacts. For example, the Aerial Alternative would require between two and four year longer to build than the other alternatives. This additional construction time would extend by up to 50% the significant operational and economic hardships compared to the other alternatives. These additional costs should be fairly presented.

C-011-010

14. **The project area should not include the area of SR 99 north and east of the Battery Street Tunnel.** This area more appropriately should be part of the transportation studies for the South Lake Union/Mercer Corridor Area.

C-011-008

FHWA, WSDOT, and the City of Seattle are committed to working with the freight community to develop alternative freight routes and strategies to address freight concerns during the construction period. The project has identified a number of strategies designed specifically for freight, in addition to the strategies designed to reduce travel demand and mitigate traffic congestion. All strategies identified for freight and general traffic will be in place prior to major construction. Chapter 8 of the Final EIS and Appendix C, the Transportation Discipline Report, also discuss the effects and mitigation for freight during construction.

The construction plans for all alternatives assume construction could occur up to 24 hours a day, 7 days a week. The lead agencies must balance the construction schedule with the transportation needs in the corridor when deciding how long SR 99 will be completely closed during construction. Not all types of construction activities would be allowed 24 hours a day. For example, as part of the mitigation measures associated with the noise variance permit, the noisest construction activities will likely be limited to daytime hours. Please refer to the Final EIS and Appendix C, Transportation Discipline Report for details about the temporary construction effects and mitigation for traffic.

C-011-009

These economic and business effects have been taken into consideration during all phases of the project design and development of construction sequencing, along with other environmental effects. These effects and mitigation measures for the current alternatives are described in the Final EIS and Appendix L, Economics Discipline Report. The project team will continue to work with businesses throughout the construction process.

C-011-010

The project area that is slightly north and east of the Battery Street

Sincerely,
North Seattle Industrial Association

Eugene Wasserman
President

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

Tunnel is part of the project because it is an important part of the transportation system that connects SR 99 to both the viaduct portion of SR 99 and local streets. Two purposes of the project as stated in the purpose and need statement are to:

- Provide capacity for automobiles, freight, and transit to efficiently move people and goods to and through downtown Seattle, and
- Provide linkages to the regional transportation system and to and from downtown Seattle and the local street system.

This includes access to and from downtown, which is provided by connections made north of Battery Street Tunnel. Therefore, these areas are part of the same corridor from a transportation planning perspective.