



May 15, 2004

Ms. Allison Ray
Alaskan Way Viaduct project
999 Third Avenue – Suite 2424
Seattle WA 98104

RECEIVED
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AWWSP Team Office

SR-99 Viaduct and Seawall Replacement – Comments on Draft EIS

Dear Ms. Ray:

The Duwamish Planning Committee has been meeting with the Alaskan Way Viaduct Design Team for the past three years. We have evaluated the various proposals for reconstruction of the Viaduct and its arterials. It has become increasingly apparent that all of the alternatives currently under consideration have significant negative impacts on transportation and freight mobility within the Duwamish Manufacturing and Industrial Center. The severity of these impacts are highly dependent on the preferred alternative that emerges from the final EIS and the design details of the finalized project. The only viable alternative delineated in the Draft EIS is a variation of the cut and cover tunnel. Our major areas of concern have been expressed to the design team during our meetings and are delineated below.

- C-012-001**
- The planning and design process for the SR-99 Viaduct demonstrates the lack of coordinated regional transportation planning in the Seattle area. The preliminary designs for this project were developed without referencing the Duwamish Manufacturing and Industrial Plan, or integrating its transportation priorities. The design alternatives described in the Draft EIS fail to adequately address the interface of SR-99 with other major arterials and proposed transportation projects in the area. These include, but are not limited to, both phases of the SR-519 Project, the Spokane Street Viaduct Project and the connection to Interstate 5 via SR-509.

C-012-001

The Alaskan Way Viaduct Replacement Project team has been and continues to coordinate with other projects in the area throughout the design process to ensure that viaduct plans effectively interface with current design plans for other projects (including SR 519, S. Spokane Street Viaduct, and SR 509).

Several projects, such as S. Spokane Street Project, are included in the updated regional 2030 baseline model used for the Final EIS transportation analysis. Other projects that had uncertain plans, timelines, or did not have funding sources were not specifically described in the EIS because of their uncertainty. Please refer to the Final EIS for updated information.

- C-012-002** • This Alaskan Way Viaduct a vital freight corridor servicing industrial and warehousing operations in Seattle's two designated Manufacturing and Industrial Centers. The Duwamish and Ballard Interbay M and I Centers are home to more than 4500 businesses and 80,000 employees. The viability of these businesses depends on an efficient and functional transportation infrastructure. Boeing attempted to make this point for years before relocating its headquarters to Chicago. In a DPC survey of businesses that had moved out of the Duwamish, transportation congestion and impeded access were repeatedly cited as primary reasons. It is imperative that any Preferred Alternative preserve the existing capacity provided by SR-99. It is also important that the project be designed to enhance and not impede access to local businesses.
- C-012-003** • The SR-99 Surface Street alternative, as described in the Draft EIS, is unacceptable. It would significantly reduce the through capacity of the corridor and exacerbate our regional transportation problems. It would also generate increased congestion on Interstate 5 and all local arterials.
 - The Bypass Tunnel, as described in the Draft EIS, is unacceptable because it would sever the vital connection between the two designated M and I Centers, the Duwamish and Ballard InterBay (BINMIC). This would force an excessive amount of truck and commercial traffic onto local streets and arterials, increasing delivery times and operational costs for industrial businesses.
- C-012-004** • The elimination of access ramps in the area of the downtown office core will have a significant impact on the North Duwamish. Without these ramps and the access that they currently provide, increased commuter traffic will be channeled into the Duwamish M and I Center from Michigan Street, north. This will increase congestion on already crowded arterials, making access to local businesses more difficult and lengthening transit times for freight deliveries. The proposed design alternatives described in the Draft EIS seem to favor the Central Business District at the expense of industrial and manufacturing operations.
 - The proposed addition of a Northbound off-ramp at or near Atlantic Street is another significant concern. After detailed review by our team of transportation consultants, this proposed ramp was removed from the approved project list in the Duwamish Manufacturing Industrial Center Plan. This ramp will dump an excessive amount of vehicular traffic onto the surface streets in an already congested area. Many of these vehicles will be seeking a direct link from Highway 99 to the I-5 and I-90 corridors. This ramp provides no significant benefits to industrial businesses or property owners, yet it will significantly impact freight mobility in the area.
- C-012-005** • The impacts of this project on the properties and businesses located north of Holgate and west of First Avenue needs to be analyzed in detail. All of the proposed alternatives severely restrict access and egress to and from these businesses and make freight deliveries virtually impossible

C-012-002

The project has been designed to accommodate freight movements due to its importance as a freight corridor. A discussion of traffic effects to all travelers, and specifically freight, is discussed in the Final EIS.

C-012-003

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-012-004

Relocation of the downtown ramps from Seneca and Columbia Streets to King Street is not expected to increase traffic in the North Duwamish area. Traffic that currently uses the existing downtown ramps at Columbia Street and Seneca Street is expected to travel further south along city streets (such as Alaskan Way) to access the new SR 99 ramps at in the stadium area. Traffic is not expected to divert further south than the new stadium area interchange. Traffic modeling indicates that these new ramps could actually slightly decrease traffic on arterials routes south of the stadium area downtown since they provide additional access to the south downtown area.

The referenced northbound off-ramp at S. Atlantic Street has been moved to Alaskan Way at S. Dearborn Street. This strategy was included in the final design of the S. Holgate Street to S. King Street Viaduct Replacement Project.

C-012-005

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

C-012-006

- Any design option for the Viaduct must adequately address its interface with both Phase One and Two of the SR-519 Project. Current proposals to redesign Phase Two of the SR-519 Project and eliminate the west bound offramp are unacceptable. The full couplet design for the SR-519 Project functioned efficiently because it distributed traffic evenly over a larger area, channeling access and distribution through a greater number of intersections. During our committee's work on the Duwamish M and I Center Plan, all of the analysis done by our transportation consultants showed that the full benefits of the SR-519 Project would not be realized until both phases were completed. Phase one alone has a greater negative impact on freight mobility and access to local businesses because it channels significant volumes of commuter traffic further south into the industrial zones, clogging arterials and degrading levels of service at key intersections. The intersection at First and Atlantic has become increasingly congested since the opening of Phase One of the SR-519 Project. The right-of-way on Atlantic Street is considerably narrower than that on Royal Brougham and can not be expected to handle the volumes of traffic that are being projected. Every traffic forecast that we have seen indicates that the service level of this intersection will continue to degrade as the area develops.
- The elimination of proposed improvements in the connections of the Viaduct to Spokane Street create additional impacts for Duwamish businesses, as well as freight mobility. The elimination of adequate Westbound access to the Spokane Street Viaduct will significantly increase congestion North of Spokane Street. The current configuration of the Spokane Street Viaduct project will force truck and delivery vehicles to travel North to Lander Street, West on Lander, and then South on First Avenue to access the Westbound lanes of the Viaduct. This circuitous route will add significantly to the levels of traffic between Spokane and Lander Streets. The current design for the Spokane street Viaduct is nine years old. It was developed before either of the sports stadiums were constructed and well before the SR-519 Project was designed. The design for Spokane Street is obsolete. It does not interface adequately with the SR-519 Project or the Viaduct alternatives as described in the EIS.

C-012-007

- Considering the potential commercial development in South Downtown, the section of the viaduct between Jackson and Holgate streets is critical. Since Safeco Field and the Seahawks Stadium and Exhibition Center opened, traffic congestion in this area has increased significantly. As the economy improves and development increases within the Stadium Transition Zone, these traffic problems will be exacerbated. The new I-C Zone surrounding Safeco Field provides the capacity for 3 million square feet of office and commercial development. To date, the SDOT traffic models have failed to take these land use actions into account. It is imperative that viaduct planners take future development in this area into consideration. This may require modifying the City traffic analysis software to evaluate the impact of significantly increased density on transportation in this area.

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.

C-012-006

Construction for the SR 519 project is complete. With the SR 519 Project, WSDOT improved connections for traffic heading to the Port of Seattle terminals, Colman Dock ferry terminal, central waterfront area, sports stadiums, and destinations in Seattle's SODO neighborhood. SR 519 improvements separate car, freight, pedestrian, and rail traffic to help improve mobility, pedestrian safety and reduce the risk of collisions. All major work was completed before the start of construction to replace the Alaskan Way Viaduct between S. Holgate and S. King streets.

The City of Seattle designed the South Spokane Street Viaduct Widening Project in 1995 and has been implementing it in phases due to funding availability. Major portions of this project are under construction and the project is scheduled to be complete by May 2012. Please see the project's website for more details:

<http://www.cityofseattle.net/transportation/spokanestreet.htm>

C-012-007

Land use assumptions used for the Alaskan Way Viaduct Replacement Project traffic models, including forecasted growth in households and employment, is based on the most current information provided in the Puget Sound Regional Council's Metropolitan Transportation Plan (2030) and the City of Seattle's Comprehensive Plan.

Model assumptions were updated for the Final EIS. Details regarding

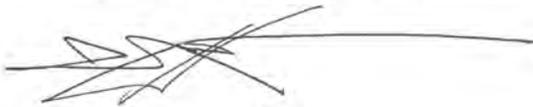
C-012-008

• The design of this project in the vicinity of SAFECO Field and Seahawks Stadium needs to be reexamined. The Port of Seattle is committed to the long term use of Terminal 46 as a container facility for Hanjin. This requires access to the north SIG yard as well as to I-5 and I-90 via SR-519. The design alternatives currently under consideration do not address the long term requirements of the Port, nor do they provide adequate access to businesses and properties in the vicinity of the project. The ideal solution to the complex issues in this area would seem to be an extension of the cut and cover tunnel south to Holgate Street. This option was investigated earlier in the design phase, but was rejected as too costly. We believe that the extension of a tunnel through this area has merit and should be reexamined. It solves the east west access issues and provides a much broader range of options for future development in the area. We need only look to Boston for a catalog of innovative transportation solutions. The Ted Williams Tunnel, the Charles River Bridge, tunnel jacking, advanced soil stabilization techniques and collaboration with Japanese and European engineering firms are setting standards for the next century. While Boston is developing a world-class transportation infrastructure, Seattle is mired in cost conscious political expediency. Effective long term solutions may be more expensive initially, but short-term fixes will cost considerably more over the long term.

C-012-009

• Budgeting for the mitigation of Viaduct construction impacts must adequately account for the length of construction and the severity of these impacts on local businesses. The City must also develop a comprehensive plan to address the alternative routing of freight and oversized vehicles during the construction period.

Any replacement for the viaduct must maintain or expand existing capacity and access, anything less will create additional transportation problems which will have to be faced in the future. It must also address the reconstruction of the crumbling sea wall which supports the viaduct itself. The only current alternative that addresses all of these issues is the cut and cover tunnel. It opens up Seattle's waterfront, simultaneously replaces the seawall and — most importantly — preserves capacity. The City and State have been exploring every option to reduce the costs of this project. We are concerned that these agencies are in such a rush to fund and initiate construction that they are willing to settle for an inadequate alternative which creates more problems than it solves.



David Huchthausen – Chair

Duwamish Planning Committee

these updates can be found in the Transportation Discipline Report (Appendix C) of the Final EIS.

C-012-008

The lead agencies have coordinated continuously with the Port of Seattle with regard to the Port's operations and facilities along the waterfront, particularly the Terminal 46 container terminal facility currently under lease to Hanjin. The design team has also coordinated continuously with the railroads, recognizing the importance of maintaining viable freight access to the SIG railyard, and of keeping the BNSF tail track operational.

A tunnel extending as far south as Holgate Street was examined much earlier in the process, and was ultimately screened out for various reasons, including cost. This cut-and-cover tunnel involved a Utah Avenue S. alignment that was investigated as part of several of these earlier concepts. Several flaws eliminated this possibility:

1. The Utah Avenue alignment was unlikely to be compatible with the existing S. Spokane Street interchange, as well as the existing First Avenue S. ramps to and from S. Spokane Street. This could require a complete reconstruction of these two areas.
2. A Utah Avenue S. alignment would also make a grade separation of S. Atlantic Street and S. Royal Brougham Way infeasible.
3. To allow local access, a Utah Avenue S. alignment would probably be on an aerial structure from S. Spokane Street to the stadium area, adding significant costs to the project.

The design of the south end of the project corridor is a result of attempting to carefully balance the needs of freight mobility both in general and with regard to the Port's container terminal facilities, stadium event traffic, and pedestrian safety and connectivity. Please see the

Final EIS for the current configuration of the south end of the project for each proposed build alternative.

C-012-009

Current cost estimate and future financing include mitigation measures to protect and support local businesses. These measures, and their costs, will be refined as project planning and development continues. Alternative routes for freight and oversized vehicles will be provided during all phases of construction.