



King County Labor Council, AFL-CIO

2800 First Avenue, Suite 206 • Seattle, Washington 98121 • Phone: (206) 441-8510 • Fax: (206) 441-7103 • E-mail: kdc@kcc.org

June 1, 2004

RECEIVED  
JUN 02 2004  
AWWSP Team Office

Mr. Douglas B. MacDonald, Secretary of Transportation  
c/o Allison Ray  
Alaskan Way Viaduct and Seawall Replacement Project Office  
999 Third Avenue, Suite 2424  
Seattle, WA 98104

Hon. Greg Nickels, Mayor  
City of Seattle  
Seattle City Hall  
600 Fourth Avenue, 7th Floor  
Seattle, WA 98104-1876

**Re: Viaduct/Seawall Replacement DEIS Comments**

Dear Secretary MacDonald and Mayor Nickels:

Thank you for the opportunity to comment on the *Draft Environmental Impact Statement for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project*. You have both demonstrated tremendous leadership in moving the project to this stage.

The Viaduct is vital to the region's future and we are fully supportive of addressing this critical link in our regional transportation system.

Loss of the roadway capacity and local access provided by the Alaskan Way Viaduct and the surface street—and the railroad mainline capacity that is dependent on the protection of the seawall—would be catastrophic. The region's economic life and well-being depends on the service provided by these facilities. A long-term closure of the corridor would harm commerce and workers.

The Viaduct is vital for the efficiency of cargo terminals operations. Container trade through the Port was 1.5 million 20-foot equivalent units (TEUs) last year. The value of two-way waterborne trade is about \$30 billion per year, which arrives at and departs Seattle primarily via rail and truck, using or passing under SR 99. Operations at Port of Seattle marine terminals support more than 18,000 jobs in the region and generate \$895 million annually in wages and salaries and \$107 million in state and local taxes each year (Martin and Associates report, September 2000). The value of international cargo moving among these areas was estimated at nearly \$100 billion in 1997 (BST Associates report, January 1999). Terminal 46 alone supports 1,366 direct jobs and 2,413 induced and indirect jobs, which provide \$187 million in personal income, and generates \$22 million in state and local taxes plus \$47 million in federal taxes.

Nancy Young, President • Sergio Salinas, Vice President • Steve Williamson, Executive Secretary

AFFILIATED WITH THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS



Sec. of Transp. Douglas B. MacDonald and Mayor Greg Nickels  
June 1, 2004  
Page 2

Our success in competing for container trade is dependent on a functioning regional land-based transportation system that can quickly move containers from ships to their inland destinations via rail or truck. Loss of the Viaduct would devastate our ability to compete for container traffic and puts all of the economic activity generated by the Port's maritime operations at risk. This also underscores the importance of choosing design and construction options that do not impede container operations and ultimately enhance our region's ability to move cargo rapidly.

Our comments on the DEIS are focused on the impact of the Viaduct on cargo terminal operations in particular on Terminal 46.

**Access to and use of Terminal 46 must be protected.**

C-016-001

- We are concerned that neither the aerial nor surface design option for the south segment, as described in the DEIS, provide for functional container operations. Both of these options, as shown, would take property that is critical to the functionality of T-46 as a container terminal. We are also concerned that the alignment with SR 99 on the surface does not provide adequate access to the facility.
- We encourage and support efforts to modify Viaduct options in order to accommodate T-46's current and future performance levels including:
  - Providing for container drayage trucking (e. g. curve radii, grades, and signals);
  - Ensuring access to the two rail yard gates to the south;
  - Ensuring access to the east to the North SIG Yard and the regional highway system; and
  - Supporting railroad intermodal activity.
- It is imperative that Hanjin Shipping, which operates Terminal 46, be able to operate as they currently do—both during construction and with a replacement facility. Temporary detour facilities, construction staging, detours, and capacity reductions on surface streets could have a profound impact on T-46. Unimpeded access to Terminal 46 for container terminal operations must be a top priority.
- In addition, we strongly urge you to consider modifications to Viaduct options that can assist in joining container terminal and railroad operations in the North Duwamish by reviewing options for rebuilding SR 99 East of its current alignment in the vicinity of Terminal 30. We need to take advantage of every opportunity to improve efficiencies and to keep our container industry a vital, competitive part of our economy for future generations.

Thank you for your consideration and attention to this matter.

Sincerely,



Steve Williamson  
Executive Secretary

opeiu8/afl-cio

## C-016-001

Viaduct replacement in the area around Terminal 46 has been separated from the Alaskan Way Viaduct Replacement Project through the Moving Forward projects as described in Chapter 2 of the Final EIS. The S. Holgate Street to S. King Street Viaduct Replacement Project provides improved access for freight trucks into and out of the waterfront area, including the area around Terminal 46. Chapter 4, Affected Environment, of the Final EIS Appendix C, Transportation Discipline Report, discusses conditions with the S. Holgate to S. King Street Viaduct Replacement Project in place. For a description of the S. Holgate to S. King Street Viaduct Replacement Project, refer to Final EIS Appendix B, Alternatives Description and Construction Methods Discipline Report.