Seattle Marine Business Coalition

2201 WEST COMMODORE WAY, SEATTLE, WASHINGTON 98199

President
Peter Philips
Philips Publishing Group
peter@PhilipsPublishing.com

Vice President
Brian Thomas
Kvichak Marine Industries
brian@kvichak.com

Secretary/Treaserer
Warren Aakervik
Ballard Oil
warren@ballardoil.com

Board of Governors

Bob Alverson
Fishing Vessel Owners' Association
robertalverson@msn.com

C-007-001

Bill Davis
Wells Fargo Insurance Services
Bill_Davis@wellsfargois.com

Lise Kenworthy
Law Offices
lisekenworthy@comcast.com

RADM John Lockwood, USCG (ret)
Todd Shipyards
John.lockwood@toddpacific.com

Pat McGarry
Manson Construction
pmcgarry@mansonconstruction.com

Kris Mullan
Alaska Frontier Company
Kris@akcosons.com

Vince O'Halloran
Sailors Union of the Pacific
Vince_sup@msn.com

Ric Shrewsbury
C-007-002
Western Towboat
ric@westerntowboat.com

Eric Sundholm
Harris Electric
esundholm@harriselectric.com

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Angela Freudenstein
Alaskan Way Viaduct Replacement Project Office
999 Third Ave., Ste. 2424
Seattle, WA 98104-4019

Comments on the Supplemental Draft EIS for the Bored Tunnel Viaduct Replacement Alternative

Thank you for the opportunity to comment on the 2010 Supplemental Draft EIS.

The Seattle Marine Business Coalition represents roughly 300 marine industrial land users within the city limits. Most of our member companies are clustered at the north and south ends of the viaduct, and rely on the efficiency that structure provides for movement between the two industrially zoned neighborhoods of the BINMIC and the Duwamish.

We are concerned with the effects the bored tunnel alternative proposal will have on traffic movement between those two neighborhoods. We believe there has been inadequate analysis of the cumulative impacts of the project on vehicle mobility on I-5, Alaskan Way and other city truck routes, arterials and residential streets. Without more comprehensive analysis, there is insufficient information in the Draft EIS to provide adequate notice to the potential users of the revised road transportation system, and/or to plan and provide for appropriate mitigation of the impacts of the project.

Specifically, further analysis should answer the following:

1. The state project managers have consistently held that the current tunnel portal configuration and access points mean that virtually all freight movement will be diverted from the existing viaduct to a new at-grade Alaskan Way. What are the expected truck volumes along Alaskan Way?
2. Given that trucks operate differently from single occupancy vehicles, what will be the effect of the additional freight volumes on Alaskan Way to overall travel times between BINMIC and the Duwamish?
3. Tolling seems to be increasingly attractive to the state as a revenue source to help offset construction costs of the bored tunnel, yet the effects of various tolling scenarios are not well defined in the Draft EIS. What will be the diversion patterns for the various tolling scenarios? Which tolling scenario is the preferred scenario? What are projected revenues for that scenario, and what effect will that scenario have on Alaskan Way traffic volumes and travel times?

C-007-001

All freight traffic traveling between Ballard and the Duwamish industrial area, other than over-height loads or hazardous or flammable cargo, could use Mercer Place/Mercer Street to access the bored tunnel via the Republican Street ramps.

Travel times along the freight routes between Ballard and S. Spokane Street can be found in the Truck Traffic and Freight section in Chapter 5 of the Final EIS Appendix C, Transportation Discipline Report. These travel times are for an average of all vehicles including general purpose and freight traffic. The traffic analysis results represent an average of all vehicles including general purpose and freight traffic. A separate detailed traffic analysis for freight was not performed.

Refer to Chapter 8 of the Final EIS Appendix C, Transportation Discipline Report for cumulative effects, including the proposed Elliott/Western Connector and two-way Mercer West Project.

C-007-002

Chapter 9 in the 2010 Supplemental Draft EIS discussed the possibility of tolling and effects if tolls were applied to the Bored Tunnel Alternative. In addition, a detailed tolling analysis has been conducted for all alternatives and is presented in this Final EIS. Please refer to Appendix C, Transportation Discipline Report, for additional detailed analysis of tolling impacts to transportation elements.

C-007-003

4. The bored tunnel alternative will by definition cause a reconfiguration of the street grid. What happens to existing recognized truck routes in the post bored tunnel scenario? It would be helpful to the freight community if WSDOT or SDOT could create a schematic to illustrate truck routes developed to accommodate freight needs under the bored tunnel alternative.

C-007-004

5. Finally, we note that two other alternatives were compared to the bored tunnel in the Draft EIS: the cut and cover tunnel and a new elevated structure. Why was maintenance and seismic upgrade of the existing structure not included in the comparison? Several of our members served on the Viaduct Advisory Committee. From that participation and independent study, we know that such a seismic upgrade would cost roughly ¼ of the cost of the bored tunnel alternative, and would maintain existing capacity and travel times.

Thank you for the effort represented by this Draft EIS, and for the opportunity to provide input regarding our concerns over the proposal.

Your responses to these concerns will help the freight community understand the effects the bored tunnel proposal may have on our businesses, such that we may work collaboratively with the city and the state to develop solutions that will help maintain the economic viability of the maritime industrial communities represented by the Seattle Marine Business Coalition.

We look forward to hearing from you.

Sincerely,

Peter Philips
President
Seattle Marine Business Coalition

C-007-003

The City of Seattle would update the Major Truck Street network to reflect changes in the street network. The City would work with the Freight Mobility Advisory Board and other stakeholders through the designation process.

C-007-004

Chapter 2, Alternatives Development, of the Final EIS describes how alternatives were evaluated in the environmental documentation for this project. The lead agencies recognize that retrofitting highways, roadways, and bridges is often a viable option to counter earthquake threats. However, unlike other bridges and structures in the area, it isn't practical to retrofit the viaduct to meet seismic safety standards by only strengthening one or two structural elements. Fundamentally, such fixes transfer the forces from one weak point in the structure to another, and the viaduct is weak in too many places. The concrete frames, columns, foundations, and even the soil under the structure don't provide enough strength by today's standards. The lead agencies have studied various retrofitting concepts, and all of these concepts fail to provide a cost-effective, long-term solution that adequately addresses the risks to public safety and the weakened state of the viaduct. Therefore it is not considered a reasonable alternative.