Port of Seattle

December 13, 2010

Ms. Paula Hammond
Secretary of Transportation
State of Washington
Transportation Building
PO Box 47316
Olympia, WA 98504-7316

The Honorable Richard Conlin
Council President
City of Seattle
Seattle City Hall
600 Fourth Avenue, 2nd Floor
Seattle, WA 98104

Re: Port of Seattle—Alaskan Way Viaduct Replacement Project SDEIS Comments

Dear Secretary Hammond and Councilmember Conlin:

Thank you for the opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Alaskan Way Viaduct Replacement Project. This project is vital to the Port of Seattle's and the region's future. We are pleased to work in partnership with the Washington State, the City of Seattle (City) and King County, to advance that future.

The Port of Seattle (the Port) has actively participated in the public process to evaluate replacement options for the Alaskan Way Viaduct (Viaduct) over the past decade. On April 12, 2010, the President of the Port Commission and the Chief Executive Officer signed a Memorandum of Agreement (MOA) with Washington State (State) signifying the Port's commitment to a replacement alternative which affords essential transportation capacity and significant environmental benefits, and minimizes construction-related disruption on the waterfront. The MOA recognizes the economic importance of an efficient SR99 roadway network with complementary system improvements for the effective movement of freight and goods locally, nationally and internationally.

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I. The Port supports the bored tunnel as the Preferred Alternative.

As described in the SDEIS, we believe that the Bored Tunnel (Tunnel) Alternative, especially combined with the complementary Program elements, represents a significant advantage over the other alternatives. The Tunnel Alternative is most consistent with our goals of:

- providing economic benefits that exceed capital costs over the lifetime of the structure;
- ensuring safe and efficient access to the working waterfront in the final configuration;
- providing an efficient connection for freight between the Duwamish and Ballard/Interbay, Seattle's two Manufacturing Industrial Centers;
- minimizing impacts to working waterfront access during construction;
- enhancing the waterfront environment for people and goods, commercial vitality, and movement of freight and goods; and,
- providing replacement capacity for long-term regional growth.

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FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Bored Tunnel Alternative.

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The Port places a particular premium on the Bored Tunnel solution because it ensures continuous use of the Viaduct while the tunnel is under construction. The continued flow of people and goods during the next five years is an essential aspect of the Governor's Export Initiative, which calls for ports to help companies increase their export volumes by 33 percent over current levels by 2015. As the State's largest port facility for both exports and imports, our companies need to have assurance of access to Port facilities through this period of unprecedented public infrastructure construction.

The Duwamish and Interbay industrial areas in Seattle are served by the SR 99 corridor and constitute a significant portion of Seattle's maritime and industrial sector which accounts for more than 120,000 jobs and an estimated $28.5 billion in annual revenue City-wide.

The Port's international trade, economic development, tourism and passenger terminal activities are vital to the economic growth of the region and the state, supporting nearly 194,000 jobs in the region, and the preferred alternative provides infrastructure improvements necessary to achieve growth in trade and jobs and increase our region's competitiveness around the world. The Port is a key gateway for Washington State producers and manufacturers to reach global markets.

The Alaskan Way Viaduct is crucial to the region's freight mobility because it provides for 1.5 million freight trips annually by grade-separation of through traffic, rail lines and industrial corridors near the Port's marine terminals, which support the movement of $30 billion in international and domestic cargo through the Port each year. The economic vitality of the region depends on a robust and efficient transportation system in the industrial area. Failure to replace the transportation capacity will jeopardize those jobs and economic activity.

The Bored Tunnel Alternative best meets the needs of transportation capacity, causes the least overall harm with environmental mitigation and minimizes construction disruptions. The current design provides a creative approach to replacement of this facility, which in a "No Build Alternative" would face closure at an unknown and uncertain future date due to seismic risk and gradual deterioration due to the structure's service life.

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II. We concur that the revised Purpose and Need statement more appropriately addresses the project purpose and needs.

As the Port commented in 2008, we believe it is imperative that the project provide a replacement facility that meets each of the purposes identified: "reduce seismic vulnerability, improve traffic safety, provide capacity to move people and goods, provide transportation system linkages, avoid major disruption of traffic patterns and protect the integrity and viability of adjacent activities." The Port, the region, and the state, cannot afford the congestion and related economic impact that viaduct failure or closure would cause.

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III. Complementary system upgrades are critical. We will continue working with our partners to advance the remaining Program elements and related projects.

The reader of the SDEIS must review critically to distinguish between transportation analyses which include only the project itself and those including the whole Program and other cumulative impacts. As we noted throughout the process to date, we must consider the function of the Viaduct in the context of the entire system and develop and implement a plan that maximizes that system. The Bored Tunnel, as an independent project, is complemented by several of the projects in the Viaduct Replacement Program, which we believe are needed to maximize the capacity and functionality of the entire system.

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Thank you for your comment.

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We appreciate your detailed comments on these projects. All of these projects (except for S. Holgate Street to S. King Street Viaduct Replacement, which is under construction) are being led by the City of Seattle and are considered as part of the cumulative effects analysis for this project. This analysis is provided in Chapter 7 of this Final EIS.

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They also provide the best mitigation of some impacts of the Bored Tunnel—for example, the loss of the downtown ramps is mitigated by increased transit service, making that mode of transportation a more viable alternative for trips to downtown, where it can be provided cost-effectively.

Alaskan Way Surface Street and the **Elliott/Western Connector:** were conceived to replace an important route for freight between the Ballard-Interbay and the Duwamish Manufacturing-Industrial Centers (MICs), in the absence of the existing SR99 Elliott/Western Avenue ramps. As the City moves into designing that route post Viaduct demolition, this functionality must be provided as it is essential for moving freight between the City's two MICs. There are implications for traffic, noise and potentially air quality at the northern end of Surface Alaskan Way (near Broad, Wall and Bell Streets, and Piers 66 and 69 and the Bell Street Parking Garage) if the Elliott/Western Avenue Connector were not built. Traffic would use this northern end of Alaskan Way which includes several at-grade rail crossings.

Additionally, the design and construction of this connector must facilitate mobility for vehicles, particularly freight trucks. The design should include grades appropriate for loaded trucks and should minimize conflicts with pedestrians at Lenora Street by maintaining the Lenora pedestrian overpass (or grade separation). In addition to providing critical connectivity to replace the Viaduct's downtown-access ramps, these two corridors will become the only legal route for trucks transporting hazardous materials into and out of the City to service all customers in our city and Port, as they will be prohibited from using the tunnel.

Mercer Corridor is proposed to provide two-way access to and from northwest Seattle and SR-99 and Interstate 5, again providing critical access for freight from the two MICs. As the City constructs Mercer East and designs and constructs Mercer West, the functionality must provide sufficient capacity to meet the forecasted volumes along the route, especially when passing under SR99 and up the hill at West Mercer Place. We support a six-lane roadway with turn lanes and improved non-motorized facilities on Mercer Street between Dexter and Fifth Avenues North. The design and construction sequencing of these new components must provide for a viable freight route between Terminal 91 and the regional highway system. This connectivity is also essential for transporting cruise ship passengers between the Smith Cove terminal and Sea-Tac Airport.

Alaskan Way Seawall replacement is no longer an integral part of this project. However, Seawall replacement continues to be vital to the City and to waterfront properties for numerous reasons. Failure of the central or the northern portion of the seawall may contribute to related loss of service on main rail lines and the Alaskan Way transportation corridor and would have severe impacts on the Port and the economy of the region. We cannot lose sight of this critical infrastructure. The City must develop a specific funding and implementation plan for the entire seawall that ensures it will be replaced within a reasonable timeframe. The Port will pursue opportunities for City and Port collaboration to attract additional funding, as demonstrated in the recent King County flood district request. The timing of construction of the Seawall will require close coordination to minimize cumulative disruption of service and potential negative effects with construction of the bored tunnel, removal of the existing Viaduct, and related transportation projects.

South Holgate to King: We appreciate the efforts of staff to develop various components of this important Program element. We look forward to a new grade separation of the tailtrack serving the Seattle International Gateway (SIG) Rail Yard at South Atlantic Street. This early implementation project, and its provisions for the movement of trucks, will enhance the viability of Seattle as a gateway

L-001-003 well into the future. Construction is underway with close coordination among area property owners and users; this excellent communication must continue in order to not disrupt connectivity between the container terminals and the rail yards and regional highway system.

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IV. The Port will continue work with the Project Team to identify, resolve and mitigate construction impacts, especially on Port facilities, as the design and construction progresses.

Port facilities, including Terminal 5, Terminal 18, Terminal 25, Terminal 30, Terminal 46, Pier 66/Bell Street Harbor Complex and parking structure, Pier 69, and Terminal 106 may be directly affected by construction. Access to outlying facilities such as Terminal 91, Fishermen's Terminal and Sea-Tac Airport may be impacted by construction traffic closures or detours. Additionally, we must resolve and mitigate cumulative construction impacts from related projects (see Comment III above). Note our early collaborative successes to mitigation construction impacts: shared funding and construction of SR519, Spokane Street Viaduct widening, East Marginal Way Grade Separation, and Duwamish Intelligent Transportation System installation.

We will continue to work with the project team and the design/build contractor to develop a final design and construction management approach that meets the freight needs for both the region and the Port's cargo and marine facility operational requirements. Final design and implementation/construction plans and specifications must maintain the functionality and capacity of both our container terminals and drayage routes, including critical needs at Pier 66 complex and Pier 69 relating to cruise passengers access, cruise vessel provisioning, maritime passenger vessel provisioning and passenger access, international conference center operations, parking and adjacent administrative/office uses.

Specific recommendations we will pursue include:

- Evaluating construction methods and scheduling to minimize time period when Broad Street is closed and Mercer Street has capacity restrictions.
- Scheduling the SR99 3 week closure outside of high-activity summer months, with a preference for scheduling early in the year, for example February or March timeframe to minimize conflicts with cargo and cruise activities.
- Maintaining a long merge lane from the south-bound Elliott Avenue on-ramp when the Alaskan Way Viaduct is reduced to two lanes further to the South.
- Working to minimize transportation, noise and vibration, and cultural/archeological impacts at Terminal 46, Pier 66 complex and the World Trade Center.
- Minimizing stormwater, earth, or cultural/archeological impacts at Terminal 46 related to tie-backs and soil modification.

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V. Tolling

Tolling can have a major impact on the transportation system as a whole. It will be critical to optimize the toll rates through the tunnel to minimize traffic diversions and related congestion on the remainder of the system. Further, the Port would oppose any tolling of SR 99 south of the tunnel, which could divert substantial traffic to surface streets in South Downtown and the Duwamish MIC.

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VI. Land uses are subject to change but must be compatible.

The SDEIS suggests that there may be land use changes in the area of the South Portal due the increased desirability of the location after completion of the Tunnel. We would emphasize the importance of planning and zoning for those uses to maintain compatibility with existing container terminal operations.

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FHWA, WSDOT, and the City are also committed to continuing to work with the Port of Seattle as the design and construction progresses. The construction activities and schedule have been updated in Chapter 3 of the Final EIS.

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With the potential to adjust toll rates in small increments during multiple time periods and in either direction, it is not possible at the EIS stage to select the final toll rates that would ultimately be implemented for the project. In fact, if tolling is implemented on the project, a series of tolling analyses would be conducted to finalize the rates and specific implementation strategies.

Charging tolls for drivers using segments of SR 99 located south of the bored tunnel is no longer being considered. The possible effects of tolling are further analyzed in this Final EIS. Please see Chapter 5 and Appendix C, Transportation Discipline Report.

Prior to a final decision about how the SR 99 Bored Tunnel would be tolled, the Washington State Department of Transportation will be working with the Seattle Department of Transportation and other agencies to refine and optimize how to toll the SR 99 tunnel while minimizing diversion of traffic to city streets and minimizing potential effects to transit, bicycle, and pedestrian travel. WSDOT, with cooperation from the City of Seattle, the Port of Seattle, and King County, will monitor and provide input to this analytical and decision-making process through a Tolling Advisory Committee. The advisory committee's responsibilities will include identification of strategies for alleviating diversion impacts.

L-001-006

As stated in Appendix G, Land Use Discipline Report, of the Final EIS,

L-001-007 As a separate issue, as described in the SDEIS, we are working with the project team on potential use of Port properties for construction activities and we will continue to find areas to cooperate and to avoid and minimize potential effects on Port operations and other Duwamish MIC uses and activities by making close-in properties available.

Thank you for the opportunity to comment. We are also sending a more detailed, technical set of comments to WSDOT's AWV Environmental Manager, Angela Freudenstein. We look forward to continuing work with your program team to define and fund a project that will replace the SR99 Viaduct.

The construction of the Bored Tunnel is a once-in-a-lifetime undertaking to modernize our public infrastructure for the 21st century. Construction will create hardships, but we anticipate those can be mitigated more easily than other replacement alternatives. We encourage all team members to work closely together to identify and mitigate construction impacts that adversely affect Port properties and tenants, as well as City properties, operations and tenants. We will work with you to make this happen.

In closing, we echo our consistent message throughout the public process, it is time to move the project forward with these issues resolved. The risks of not doing so, both to the safety of our people and to our broader economic recovery, are too great.

Sincerely,

Bill Bryant
Commission President

Tay Yoshitani
Chief Executive Officer

cc: Angela Freudenstein, WSDOT
Port of Seattle Commission

new blocks of property in the south portal area would be available for development under the City's Industrial Commercial land use zone. Any future development of this property will be required to comply with City land use plans and policies, and is not expected to influence development activity or trends in the Pioneer Square or Greater Duwamish MIC neighborhoods.

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Thank you for working with the project team to coordinate use of Port properties and helping to determine ways to avoid and minimize effects during construction.