Port of Seattle

December 13, 2010

Ms. Angela Freudenstein, AWV Environmental Manager
AWV Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104-4019

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

Dear Ms. Freudenstein:

Thank you for the opportunity to comment on the 2010 Supplemental Draft Environmental Impact Statement (SDEIS) for the Alaskan Way Viaduct Replacement Project. We very much appreciate the team's effort, and our partnership providing the opportunity for the Port to participate in the process. We look forward to continuing work with the project team to address these comments and other, as yet unidentified, issues.

Our policy letter from Commissioner Bryant and CEO Yoshitani outlines the Port's major concerns regarding the SDEIS. For your ease of use, this letter repeats—and expands on—the points made in the policy-level letter.

I. The Port supports the Bored Tunnel as the Preferred Alternative.
II. We concur that the revised Purpose and Need statement more appropriately addresses the project purpose and needs.
III. Complementary system upgrades are critical. We will continue working with our partners to advance the remaining Program elements and related projects.
    - Alaskan Way Surface Street and the Elliott/Western Connector
    - Mercer Corridor
    - Alaskan Way Seawall
    - South Holgate to King
IV. The Port will continue working with the Project Team to identify, resolve & mitigate construction impacts, especially on Port facilities, as design and construction progress.
V. Tolling rates must be set to optimize system efficiencies.
VI. Land uses are subject to change but must be compatible with nearby Port uses.

In addition, the Port has submitted comment letters on the 2004 DEIS and 2006 SDEIS. While much has changed with regard to the project envisioned in those documents, these comments are additive to those comments which are still applicable to the current project. Our additional comments here address (A) the project, (B) its construction impacts, and (C) cumulative impacts. Our comments below focus on the SDEIS document itself. However, some of these issues are a carry-over from one or more Discipline Reports, and should be addressed in multiple locations as appropriate.

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A. Project

L-002-001

The Bored Tunnel alternative, combined with the complementary Program elements, bears a significant advantage over the other alternatives. It will be critical for the project team to communicate with our tenants as final design decisions are made to ensure that the currently expected benefits carry through.

1. South Portal

L-002-002

The close collaboration with the Port demonstrated during design and construction for Holgate to King, must be repeated with the South Portal. Discussion in specific elements of the environment (below) identify the importance of working together to replace the Viaduct and maintain operations at the state's largest port facility for both imports and exports. The South Portal design must minimize impacts to Port facilities such as Terminal 46 and Terminal 25/30, as well as Terminals 5 and 18. We will continue to work with the project team to minimize and/or mitigate impacts.

Please correct the rail yard description on page 76. The tail track links to Main SIG and not the North SIG rail yard.

2. North Portal

L-002-003

We support six lanes on two-way Mercer under SR99 and the curved Sixth Avenue, combined with the concept of reconnecting the street grid at Thomas, John and Harrison. The design and construction sequencing of these new components must provide for a viable truck corridor between Terminal 91 and both Interstate 5 and SR-99. The impacts of not widening Mercer under Aurora have not been addressed in the document, and we expect that this means there will be six lanes.

3. Central Waterfront : Project only traffic analysis

L-002-004

Traffic analysis for the Project Only scenarios shows the unmitigated impacts of this design without the related project, the Elliott/Western Connector, which is a vital component of the overall Program, and part of the Port's Agreement with WSDOT. Without it, vehicles would need to cross the BNSF mainline tracks in the vicinity of Broad Street. Train crossings in that area can substantially increase vehicle travel times in that corridor, cause congestion along the waterfront, and affect the reliability of this important freight route.

Additionally, high traffic volumes along Alaskan Way and at-grade rail crossings along the North Waterfront, would likely impact access to our facilities on the north waterfront, requiring mitigation:

Pier 66 complex: The cruise ships home-porting at P-66 rely on landside access from Alaskan Way. Cruise traffic includes provisioning trucks, charter buses and other commercial vehicles, as well as private vehicles. A street use permit provides for use of some of the four lanes on Alaskan Way on days when cruise ships are in port. Our concern is further congestion affecting provisioning and passenger access in the cruise ship area at P-66 due to additional general purpose traffic. Our cruise terminals operate from May to October. Cruise ship port calls can generate over 1,200 passenger vehicle trips.

L-002-001

We will work closely with Port of Seattle staff to ensure your tenants are involved in design decisions as appropriate.

L-002-002

The project team is also committed to continuing to work closely with the Port of Seattle during the design and construction of the south portal. We have corrected the sentence in the Final EIS.

L-002-003

For the Final EIS, Mercer Street is assumed to be a six-lane cross-section with three lanes in each direction under Aurora Avenue. The preferred Bored Tunnel Alternative includes the curved Sixth Avenue configuration.

Please see the Final EIS Appendix C, Transportation Discipline Report, for discussions regarding freight routes during construction and final design of the build alternatives, including the Bored Tunnel (Preferred Alternative), as well as the Cut-and-Cover Tunnel Alternative and the Elevated Structure Alternative. Appendix C describes transportation condition associated with the SR 99 corridor through downtown Seattle and predicts the transportation performance and effects of the project and larger Program.

L-002-004

Travel times along the routes between Ballard and S. Spokane Street can be found 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,

L-002-004

In addition, Pier 66 is home to the Bell Harbor International Conference Center, a restaurant complex, a maritime museum, market and sandwich shop, and several public access viewpoints. Our World Trade Center (WTC) is located on the east side of Alaskan Way surface, along with the Bell St. Pier parking garage. Most of these businesses rely on access along Alaskan Way surface for both pedestrian and vehicular access.

Pier 69: Serving as the Port's headquarters, it is also home to Clipper Navigation operating a passenger vessel terminal, and Arctic Storm offices. Clipper Navigation operates passenger vessel operations with significant passenger pick-up and drop-off activity as well as fleet provisioning. Arctic Storm requires occasional access to our northern apron by large trucks. Landside access to the P-69 sidewalk is critical for passengers and employees. Access to the north apron of Pier 69 is also critical for Clipper provisioning, taxi queuing, and ADA parking, such that high traffic volumes on Alaskan Way may interfere with the passenger access and northbound left turns accessing the pier.

4. Tolling

L-002-005

WSDOT should optimize the tolls through the tunnel to minimize traffic diversions. The Port would oppose any tolling of SR99 south of the tunnel, which could divert substantial traffic to surface streets in South Downtown, affecting access to our container terminals.

5. Elements of the environment

L-002-006

a. Noise and vibration: No baseline sound/vibration information is presented for Terminal 46 (T-46), Pier 66 (P-66), the WTC and Pier 69 (P-69). SDEIS materials describe more than 5 dBA increase for the P-66/WTC area, and increases of lesser magnitude at T-46 and P-69. Increased noise at these locations should be noted in light of present and future land uses and activities. There are potential business effects from increased noise such that future uses at P-66/WTC and P-69 may be adversely affected. Foreclosed re-development potential due to changes in noise environment at P-66/WTC may result in additional costs for noise mitigation.

It is our understanding that the north end Alaskan Way noise increases are due to assumptions of the Project Only construction, which assumes the Surface Alaskan Way/Elliott Western Connector is not yet constructed. This noise/vibration impact would be eliminated by completing this project, and future noise levels would be below today's levels.

L-002-007

b. Land Use: Please provide further information on: land use changes in the area of the South Portal which may have adverse affects on continuing and future marine cargo uses and activities; and project effects and plans for the Lenora Street pedestrian bridge in light of viaduct demolition. Land use changes in areas adjacent to T-46 may impede long-term use of the facility and lead to higher costs due to traffic and access management.

L-002-008

c. Social: The document describes potential changes in activity in the South Portal area while characterizing the area as light industrial, without acknowledging existing marine industrial uses and activities. Social/economic changes in the areas adjacent

Transportation Discipline Report for cumulative effects, including the proposed Elliott/Western Connector and two-way Mercer West Project.

Under the Bored Tunnel Alternative, trucks could potentially experience longer delays at Broad Street due to increased traffic as well as regular train crossings. However, the project assumes that all the Program elements, including the Elliott/Western Connector and Alaskan Way surface street improvements would be in place by the design year 2030. The Program elements are expected to improve freight mobility and access to Alaskan Way businesses as discussed in Chapter 8 of the Final EIS Appendix C, Transportation Discipline Report.

L-002-005

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. The possible effects of tolling are further analyzed in this Final EIS. Please see Chapter 5 and Appendix C, Transportation Discipline Report. SR 99 south of the tunnel, including access to the interchange in the stadium areas, is not being considered for tolling.

L-002-006

Operational noise and vibration effects are described in Chapter 5 and mitigation measures are described in Chapter 8 of the Final EIS. Effects are evaluated for existing land uses only, future land uses are not evaluated. Chapter 7 of the Final EIS discusses cumulative effects; cumulative noise effects that would result from the completion of this project and other foreseeable, future projects are discussed there.

Noise impacts were not evaluated for industrial zone areas (such as

L-002-008

to T-46 may impede long-term use of the facility, or require increased costs for operation and improvement.

L-002-009

d. Parks and recreation: Please discuss effects of viaduct demolition on the Lenora Street pedestrian bridge and overlook, and responsibilities for replacement. This facility is owned and maintained by the Port. It is subject to a pedestrian easement that was required as part of a street vacation agreement with the City of Seattle. We anticipate replacement will include the public seating and waterfront viewing area at the top of the elevator/stairway tower as designed.

The SDEIS indicates that the Portside Pedestrian/Bike Trail would be maintained through construction, but our analysis indicates that that may not be feasible. Please discuss the potential for closure of the Portside Pedestrian/Bike Trail during tunnel construction, and related mitigation measures. (This is also a concern in various Discipline Reports.)

L-002-010

e. Visual Quality: Please review the accuracy of the description of the width of the planned portside path (p. 4) and delete reference to Terminal 37 (p. 33), which is now included at T-46. (This is also a concern in various Discipline Reports.)

B. Construction Impacts

Construction staging and detours will have a major impact on many of our tenants. We have attempted to address their concerns in our partnership process and will continue to do so throughout the design and construction. Given the limited amount of information available at this point on construction impacts, we have the following comments:

1. South

L-002-011

Staging areas and detours must be designed to maintain both functionality and unimpeded access to all Port container terminals, in particular T-46 and T-25/30. Drayage routes must be maintained, and any constraints on these routes will need to continue to be discussed and mitigated to the extent reasonably possible with our staff and terminal operators. Our staff will continue to work with the project team to ensure that port-related drayage movement can flow between all our terminals, both the north and the main gates of the SIG rail yard and the freeway system as needed.

Please address the project proposal to reconfigure activities at T-46 to enable five acres to be used by the tunnel contractor. The Port is working with the project team to accommodate construction without unmitigated impacts to current Port activities. (Ref. SDEIS, p. 136 and App. B, p. 27).

Please provide information on south portal construction location (App B, p 39, last paragraph). As opposed to WOSCA, it appears that the construction approach that offers the least disruption to the Pioneer Square and stadium area is the Bored Tunnel alignment that allows most of the construction to occur to the west in Alaskan Way.

2. North

L-002-012

The loss of the Western and Elliott Avenue ramps during Viaduct demolition (and continuing in the project only scenario), forces traffic into the Bored Tunnel (and across Mercer) or onto Alaskan Way. This is of particular concern for access to Terminal 91, for the industrial activities, the cruise ship terminal and for access from

Terminal 46). Noise levels were evaluated at Pier 69 and noise levels at Pier 66 would be similar to those modeled at Pier 69. Noise levels at Pier 69 would be similar to existing conditions. Mitigation measures, such as noise walls, were evaluated in the Noise Discipline Report. For all three build alternatives, there are no feasible mitigation measures to reduce further traffic noise levels because the surface streets provide local access to downtown and the waterfront throughout the central waterfront. To be effective, noise barriers would have to block access to the surface streets. Please refer to Appendix F, Noise Discipline Report, of the Final EIS for additional details.

Other Program elements, such as the Surface Alaskan Way/Elliott Western Connector, would go through an enviromental evaluation, and would be evaluated for mitigation measures.

L-002-007

Land use changes in the South portal area would primarily consist of relatively small property acquisitions that would be for transportation use. Proposed land use changes south of Downtown are discussed in section 4.3 of Appendix G, Land Use Discipline Report. Overall, the south portal area would experience substantial improvement that would benefit motorists and pedestrians, as well as providing improved accessibility to land uses.

L-002-008

Appendix G, Land Use Discipline Report, of the Final EIS describes land uses in the south to include retail, office, terminal/warehouse, residential, parking and recreational/entertainment in the Pioneer Square portion; and waterfront terminal/warehouse, and recreational/entertainment uses in the Greater Duwamish MIC portion. The analysis of potential changes in land use considers that that the Port of Seattle's Terminal 46 shipping container terminal would be affected during construction. Operational benefits would include increased east-west connectivity between the

L-002-012

the Duwamish for fuel and provisioning trucks for the fishing fleet at Fishermen's Terminal and Terminal 91.

Please provide evaluation of the need for Mercer West capacity at the West end, where it connects with Elliott Avenue, especially during the period during demolition of the Viaduct and before construction of the related Elliott/Western Connector project (App B, p 10 and p. 21).

3. North Waterfront

Access needs to the Port's north waterfront properties includes Pier 66, the WTC Complex and parking garage, and Pier 69.

L-002-013

Garage access on Elliott and Wall Streets: Parking in the project area will be severely constricted during construction, making it essential to ensure that existing parking facilities can fulfill their function. The Port owns a large parking structure with two entries/exits on Elliott Avenue and one on Wall Street. Construction staging and detour routes should ensure access/egress to/from all three gates throughout all construction stages.

L-002-014

Elliott On-ramp merge: When the Viaduct will be restricted to two lanes in each direction, the team should maintain a long southbound merge lane from the Elliott Avenue on-ramp to avoid excessive backups.

L-002-015

Capacity and functionality of rail operations: Please address whether train traffic along the mainline north of the north tunnel portal could be affected and interrupted by construction activities to demolish the existing Viaduct. The northern mainline is a critical freight and passenger corridor. Please describe the potential impacts to rail operations, and the mitigation to minimize these impacts.

L-002-016

Loss of existing Elliott and Western Viaduct ramps, forcing detour to northern Alaskan Way. The Elliott and Western Avenue ramps will be demolished at the final construction phase of this project. Our concerns are related to facility access for uses described in section A.3 above. How will potential effects on Port facilities along northern Alaskan Way be mitigated during this final phase of construction? What are the options to detour general purpose traffic to other routes that are not impacted by rail crossing blockages?

4. Elements of the Environment

L-002-017

a. **Transportation**: During construction, designation of a truck route through the corridor is imperative. Additionally, will a designated route be maintained throughout construction for over-legal truck movement?

L-002-018

Final tunnel connection will require a three-week closure of SR 99 before the Tunnel is in use. The team should consider scheduling this during February or March when activity along the waterfront is lowest and there would be no conflicts with cruise operations on Alaskan Way.

L-002-019

b. **Air, Noise, vibration and construction dust**: We will work with the project team to mitigate any impacts of construction on air quality and noise levels at Terminal 46, Pier 66 and the WTC, and Pier 69. Should construction activities impact existing uses at these or other facilities owned by Port, the project would need to provide mitigation.

historic Pioneer Square and Greater Duwamish MIC neighborhoods, and enhance the accessibility to existing land uses, such as waterfront businesses.

L-002-009

The Lenora Street pedestrian bridge would not be removed and is expected to remain in operation during most of the viaduct demolition duration. Access to the bridge would be temporarily disrupted during the demolition activities in that area. See Chapter 6 of the Final EIS for more discussion of construction effects on recreational resources.

Final EIS Appendix H, Social Resources, also acknowledges that bicycle and pedestrian facilities in the vicinity of the port may be obstructed during construction.

L-002-010

The description of the Port Side pedestrian/bike trail in Appendix D, Visual Quality has been updated in this Final EIS. References to Terminal 37 have been deleted.

L-002-011

The lead agencies have coordinated continuously over the last several years, and will continue to work with the Port of Seattle as design and construction progresses. Please see the Final EIS Appendix B, Alternatives Description and Construction Methods. Section 3.1.1 of Appendix B details the construction staging sites, and the proposed activities on the construction staging activities on the Port of Seattle's facilities, including Terminals 106, 25, and 46. Chapter 6 of the Final EIS also gives updated information on construction staging sites and construction activities for the south portal of the Bored Tunnel Alternative.

L-002-020

c. **Land Use:** Please provide more detailed, actionable information concerning construction impacts: particularly materials and spoils transshipment at T-46; construction effects on the Lenora Street pedestrian bridge in light of Viaduct demolition (including replacement cost/responsibility); and a description of potential disruption of access to T-46 administration building due to need for tie-back installation.

L-002-021

Under Cumulative Impact Analysis, please provide information regarding effects due to Western and Elliott Connector construction, particularly for WTC and other adjacent Port-owned structures.

L-002-022

d. **Social**: Please provide discussion of the fate of the Lenora Street pedestrian bridge as a community asset due to Viaduct demolition. Replacement responsibility for the bridge is undetermined, but should not fall on the Port.

L-002-023

e. **Historical, Cultural, Archaeological**: Potential tie-back construction at the east margin of T-46 may result in increased costs and limitations, if cultural materials are discovered. Project could impede T-46 uses and activities.

L-002-024

f. **Surface Water**: Please discuss effects of the use of port facilities for transfer of large volumes of construction spoils over extended periods, including de-watering, which may require wastewater discharge permit review. Construction mitigation measures may require review, potentially requiring construction NPDES permits. Monitoring and compliance will be required for transfer actions at Port facilities. Project-related activities will require Port oversight at T-46, T-25, and T-106. Stormwater systems at these sites could require modification. There are potential port costs for modification and oversight.

L-002-025

g. **Fisheries, wildlife, and habitat**: Please discuss effects of the use of Port facilities, in particular T-46, for transfer of construction spoils which may involve the port in aquatic habitat matters, including spills and surface water control of high PH, high turbidity materials. Please discuss the potential need for alteration of existing dock and pier facilities, and associated aquatic habitat considerations for transshipment of project materials. Materials transfer needs due to the project could involve the port in changes to existing facilities. Existing and future T-46 uses and activities may be impeded. What mitigation measures are proposed, and what approach will be taken to hold the Port harmless in case of an incident?

L-002-026

h. **Earth**: Please provide discussion of: (1) bulk construction materials and spoil transfer at Port facilities as it entails dewatering and handling of potentially high pH materials and (2) tie-back or soil modification at the east margin of T-46. What are the plans for mitigation of effects and potential costs due to disruptions of T-46 operations.

The SDEIS Appendix P (p. 65) suggests that manmade fill with debris and potential contaminants cannot be reused as fill. However, please address if some moderately contaminated soils may be allowed to be used as backfill, consistent with regulatory requirements.

L-002-027

i. **Hazardous Materials**: As discussed above, use of Port facilities for handling and shipment of potentially hazardous or controlled construction materials and spoils will require attention to liability and compliance matters. Please address

Construction activities could be managed to avoid and minimize impediments to vehicle access to the marine cargo area of Terminal 46.

Increased truck traffic along the E. Marginal Way S. haul route could result in travel delays for north-south traffic and could result in traffic congestion at the points of vehicle access to the marine cargo area of Terminal 46 and Colman Dock. Use of E. Marginal Way S. as a haul route also could affect other marine, industrial, and water-dependent uses west of E. Marginal Way S., including Terminals 25 and 30. In addition, access to the U.S. Coast Guard facility at Pier 36 and existing business locations between Pier 36 and Terminal 30 could be affected. Please refer to Final EIS Appendix C, Transportation Discipline Report, for additional discussion of detours and potential traffic impacts.

L-002-012

Mitigation measures will be in place to help keep traffic moving during construction as describe in Chapter 8 of the Final EIS and in Appendix C, Transportation Discipline Report. With the preferred Bored Tunnel Alternative, access to and from SR 99 in the north end will be provided near Harrison and Republican Streets. The City of Seattle is leading the Mercer West Project that will provide improvements between Elliott Avenue W. and Fifth Avenue N. The Mercer West Project is expected to be completed before the bored tunnel opens and the Elliott and Western Avenue ramps are demolished.

L-002-013

Access to businesses will be maintained throughout construction. Temporary access limitations and any required changes to access during construction will be mitigated to the extent practicable and in conjunction with the affected businesses and residents. Access during construction for businesses and residences will continue to be addressed through on-going evaluation of effects during construction. The project will continue coordination and mitigation activities with

L-002-027

the approach to holding the Port harmless from impacts due to hazardous construction material or spoils.

C. Cumulative Impacts

L-002-028

Complementary system upgrades are critical. We will continue working with our partners to advance the remaining Program elements and related projects. Our policy letter highlights the need and issues surrounding the four projects below:

1. Alaskan Way Surface Street and the Elliott/Western Connector
2. Mercer Corridor
3. Alaskan Way Seawall
4. South Holgate to King

For some of these projects, construction could overlap with the Bored Tunnel alternative construction/viaduct demolition. We will continue to work with the responsible agencies to identify, avoid and minimize cumulative impacts. Local development projects should be required to address the cumulative impacts of street closures due to construction activities that occur concurrently with AWV replacement.

1. **Alaskan Way Surface and Elliott Western Connector**: is essential for moving freight between the city's two Manufacturing Industrial Centers (MICs). We appreciate how the programmed new connection to these two streets complements the Bored Tunnel alternative. They also provide access from the airport to the Terminal 91 cruise terminal. These roads must be designed to accommodate the trucks and buses that serve these facilities, including over-legal trucks and trucks carrying flammable materials.
2. **Mercer Corridor**: must provide sufficient capacity to meet the volumes anticipated both to the east and west of the SR99 corridor and provide access to Terminal 91 and other portions of the Ballard/Interbay MICs. This includes both the underpass at SR99 and the yet-to-be-determined roadway configuration on West Mercer and West Mercer Place.

   Please evaluate construction methods and scheduling to minimize the time period when Broad Street is closed and Mercer Street has restricted capacity.
3. **Seawall**: is critical infrastructure which is integral to the transportation system. Its potential failure, and related failures of the main rail line and Alaskan Way surface along the Northern portion, would have severe impacts on international trade, and the economy of the region. We will work with the City for a funding and implementation plan that ensures both the south and north portions be replaced within a reasonable timeframe. The cumulative impacts of construction of the replacement seawall interacting with the viaduct replacement should be identified and appropriate mitigation measures presented.
4. **South Holgate to King:** is already in construction, as discussed in the policy letter, with close coordination among area property owners and users. This excellent communication must continue, and be expanded during the Bored Tunnel construction as well.

business and residential stakeholders, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups. Refer to Chapter 8 of the Final EIS for parking mitigation strategies.

L-002-014

With the Bored Tunnel construction staging, the southbound Elliott Avenue on-ramp would be an add lane forming 3 lanes on SR 99. The third lane would be dropped just north of the Columbia Avenue southbound on-ramp. Please see the Final EIS and Appendix C, Transportation Discipline Report.

L-002-015

WSDOT will be preparing a construction traffic management plan for the selected alternative that includes more localized mitigation measures as construction plans are refined. Impacts to train operations will be minimized. Please see the Final EIS, Chapter 8 Mitigation for additional information on mitigation.

L-002-016

Some streets from S. King Street to Battery Street would experience periodic closures to support the viaduct demolition. Localized mitigation measures will be developed as construction details are refined. A construction traffic management plan will be prepared to ensure that construction effects on local streets, property owners, and businesses are minimized. The traffic management plan will include procedures for identifying and incorporating the needs of those affected by the project, specifically, but not limited to, the Port of Seattle. Please see Chapter 6 of the Final EIS, Appendix C, Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

L-002-017

Some streets adjacent to the viaduct from S. King Street to Battery

Thank you again for the opportunity to partner on this project and comment on this Supplemental Draft Environmental Impact Statement. The construction of the Bored Tunnel is a mammoth undertaking, which will create hardship, but we anticipate that can be mitigated more easily than with other replacement alternatives. We look forward to continue working closely with the team in identifying and mitigating construction impacts that adversely affect Port properties and Port tenants. Please do not hesitate to contact me if you have any questions.

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

Sincerely,

Geraldine H. Poor, AICP
Manager, Regional Transportation
Port of Seattle

cc: Akiyama, Blomberg, Graves, Maruska, Merritt, Porter, Wolf, D. Burke, M. Burke, Gellings, Goodwin, Guthrie, Pulsifer, Sloan, Skaggs

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Street would experience periodic closures to support the viaduct demolition. Localized mitigation measures will be developed as construction details are refined. We understand the need to maintain a route for over-legal vehicles and will work with the City of Seattle to ensure one is maintained throughout construction to the extent practicable. A construction traffic management plan will be prepared to ensure that construction effects on local streets, property owners, and businesses are minimized. The traffic management plan will include provisions to provide continuous access to truck routes. Please see Chapter 6 of the Final EIS, Appendix C, Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

L-002-018

Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report summarizes the construction stage that was assumed for the analysis (Traffic Stage 7). Actual staging will be developed further and revised as construction plans are refined. Timing for the closure of SR 99 to switch traffic from the existing route to the bored tunnel would be determined based on a variety of factors. The lead agencies will continue to coordinate with the Port of Seattle and other stakeholders in the freight community as the project progresses.

L-002-019

Mitigation of construction effects is discussed in Chapter 8, Mitigation of the Final EIS. Please refer to the mitigation sections in Appendix F, Noise Discipline Report, and Appendix M, Air Quality Discipline Report, for additional mitigation details.

L-002-020

Construction activities proposed for Terminal 46 would be related to materials and spoils transshipment and would include erecting and operating a conveyance system for transferring material/spoils onto

barges. Spoils would be removed though the south portal area using conveyors or pipes and transported to a staging area for stockpiling before being transported by truck or barge to the disposal site. The design and construction of the conveyance system will be determined by the Design-Builder. Appendix B, Alternatives Description and Construction Methods Discipline Report, provides more detail on the construction process. The Lenora Street pedestrian bridge would not be removed and is expected to remain in operation during most of the viaduct demolition duration. Access to the bridge would be temporarily disrupted during the demolition activities in that area. Access to the T-46 administration building would also be maintained. Please refer to Appendix L, Economics Discipline Report for a discussion of issues related to business impacts.

L-002-021

Chapter 7 of the Final EIS explains cumulative effects of the Bored Tunnel Alternative when combine with the effects of other Program elements. This includes the Elliot/Western Connector - Pike Street to Battery Street. Long-term, this project would have a positive cumulative effect on land use in Seattle. Appendix C, Transportation Discipline Report, presents additional information on expected trip distributions, levels of service, and traffic conditions during construction. Additional information regarding potential effects on businesses is provided in Appendix L, Economics Discipline Report.

L-002-022

The Lenora Street pedestrian bridge would not be removed and is expected to remain in operation during most of the viaduct demolition duration. Access to the bridge would be temporarily disrupted during the demolition activities in that area. Chapter 6 of the Final EIS contains this information.

L-002-023

Any potential discovery of cultural materials at T-46 is addressed in the Section 106 Memorandum of Agreement and in Appendix I, Historic, Cultural and Archaeological Discipline Report, of the Final EIS. Investigation of this area at this time would potentially expedite rather than impede the Port's future activities as the cultural resources would have to be addressed at that time.

L-002-024

The Final EIS and Appendix O, Surface Water Discipline Report, have been updated to discuss the potential use of Port of Seattle facilities during construction and the need to coordinate with the Port regarding existing permit conditions.

The lead agencies are aware that a NPDES construction permit(s) from the Washington State Department of Ecology may be required for this project, as discussed in Chapter 8 of the Final EIS. The need for this permit will be determined during the permitting phase of the project (after the build alternative is selected in the Record of Decision).

L-002-025

The effects of land use changes as a result of using existing waterfront facilities for project activities are addressed in the Land Use Discipline Report (Appendix G). As part of agreement with the Port for use of T-46 WSDOT will mitigate for the use of the space on the north section of T-46. It is likely that there are some activities the contractor will be required to do (such as lay a concrete path for hides storage, construct a crane maintenance building, among others). Additionally, it is likely the contractor would demo the north 50 feet of an existing building on T-46 to allow entrance to the terminal and provide a path for the conveyor. Finally, following construction, the contractor will be required to restoresections of the T-46 to its pre-project condition. No in-water work is proposed as part of the project.

It is expected that any environmental permits needed by the contractor, would require the implementation of BMPs to prevent the spillage of excavation material into the water. It is also expected that the BMPs described in the Surface Water Discipline Report (Appendix O) would also be implemented at these waterfront facilities to prevent effects of surface water runoff from entering Elliott Bay and impacting water quality conditions. These permits would also include appropriate mitigation for the effects of process on aquatic habitat or species.

L-002-026

Effects and mitigation measures related to high pH soils are included in Appendix Q, Hazardous Materials Discipline Report, of the Final EIS. Handling of spoils and related sediment transport are discussed in Appendix Q as well as Appendix O, Surface Water Discipline Report, of the Final EIS. Effects and mitigation measures related to use of tiebacks, ground improvement and other features at the east margin of Terminal 46 are discussed in Appendix P, Earth Discipline Report of the Final EIS. The exact locations of potential tiebacks and ground improvement will be determined during final design of the project and therefore cannot be provided in the Final EIS level studies. WSDOT will continue to coordinate with the Port during final design to address Terminal 46 operations during construction. Specific information cannot be provided in the Final EIS.

Potentially contaminated soils will likely not be re-used as fill on the project. Most of the soils are not suitable for use as fill because they contain too many fine particles, are too wet, or contain other debris. The use of existing soil as fill will be determined during final design and construction. Most of the spoils would likely require off-site disposal.

L-002-027

Agreements with the Port for WSDOT work done on their property would be developed to identify WSDOT's responsibility for identification, management and disposal of hazardous materials encountered during the construction activities.

L-002-028

We appreciate the comments you have provided on these projects here and in your other comment letter. 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 for all of the build alternatives is provided in Chapter 7 of this Final EIS. WSDOT will continue to coordinate with the Port to maintain essential conditions for freight mobility and minimizing construction effects as construction of the S. Holgate to King Street project progresses.