December 13, 2010

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

Dear Ms. Freudenstein:

The Manufacturing Industrial Council shares the concerns expressed in the attached letter from the North Seattle Industrial Association and urges WSDOT to respond to these issues in the final EIS.

Sincerely,

Dave Gering, Executive Director
Manufacturing Industrial Council of Seattle

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December 12. 2010

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The North Seattle Industrial Association (NSIA) has reviewed the Alaskan Way Viaduct SDEIS and has found the following deficiencies in the analysis. We request that these deficiencies be address in the FEIS.

C-011-001

1. The SDEIS and the previous EISs do not adequately document the impact of the Deep Bore tunnel on freight movements through this corridor and its impact on the maritime/industrial businesses that use the corridor. The SDEIS is deficient in the following way;

   a. The SDEIS assumes that truck operations are the same as automobile operations. Freight operations are very different. The FEIS needs an analysis of impact of the Deep Bore Tunnel on freight operations.
   b. The SDEIS lacks an analysis of the impact of the grades in the Deep Bore tunnel, Mercer Place and the new Western and Elliott on freight and transit operations.

   c. The EIS does not show how truck routes will change through the entire corridor from Shoreline to Tukwila/SeaTac, I-5 to the Central Waterfront. The EIS cannot identify what is the freight movement impacts discussed above and how they might be mitigated. The FINAL EIS needs to document them these impacts and how they will be mitigated

C-011-002

2. The SDEIS and the previous EISs do not adequately address the movement of hazardous, flammable and combustible material through the Deep Bore corridor. There is no discussion of alternate routes or potential use of the tunnel. Combustibles materials particularly are used to fuel the maritime activity in NSIA area and their movement is very important to the growth of our maritime industries.

C-011-003

3. The SDEIS fails to identify all the traffic impacts from the tolling of the Deep Bore tunnel and fails to discuss any mitigation of these impacts. The SDEIS fails to adequately identify and analyze the impacts of tolling on surface streets. Specifically, WSDOT's preliminary analysis of tolling diversions suggests significant negative impacts on Alaska

C-011-001

The impacts of the Bored Tunnel Alternative on freight traffic and freight operations are discussed in Chapters 5, Permanent Effects, and 6, Construction Effects, of the Final EIS. Chapters 5, 6, and 7 of Appendix C, Transportation Discipline Report contains detailed transportation analysis. The traffic analysis results represent an average of all vehicles including general purpose and freight traffic. A separate traffic analysis for freight was not performed because the effects of the project on freight were captured quantitatively in the overall traffic analysis for the project, as discussed in Appendix C as well as qualitatively in other discipline reports. Grades in the proposed bored tunnel as well as alternative routes such as Mercer Place and Western and Elliott Avenues are included in the transportation analysis.

C-011-002

Chapter 5 of Appendix Q, Hazardous Materials Discipline Report of the Final EIS has been modified to state that: "The bored tunnel will be closed to all placard vehicles transporting potentially dangerous cargo. This includes all vehicles carrying explosives, flammable substances, non-flammable gas, dangerous materials, oxidizer materials, corrosive materials, poison and radioactive materials. These materials are not currently allowed in the Battery Street Tunnel, so all these materials will continue to be transported using the hazardous material detour routes within the City of Seattle."

C-011-003

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-011-003 | Way and other City streets. The scope of the tolling analysis should be expanded to include Nickerson, Mercer and 15th Ave. W. Elliott Avenue West as well as other critical arterials such as Western, First, Second, Third, Fourth and Fifth Avenues. Next, no comprehensive mitigation strategies have been developed or analyzed.

C-011-004 |

C-011-005 | 4. The SDEIS does not have an adequate description of the construction impacts of the Deep Bore tunnel on freight, transit or automobile movements.

C-011-006 | 5. The SDEIS does not have an adequate description of the operation of the Central Waterfront and particularly the operations of Alaskan Way surface for decision makers to make adequate decisions of the impacts of the Deep Bore Tunnel on traffic in this corridor. The Central Waterfront will be subject to a separate design project and a separate environmental process. The North Seattle Industrial Association wonders how the SDEIS can make so many assumptions about the operation and design of the Central Waterfront without a draft design.

C-011-007 | 6. The SDEIS makes many assumptions about transit operations, the Central Waterfront project, the West Mercer project, and tolling. Since these projects have not been designed the Viaduct project needs to have alternatives in place in case these projects are not implemented as planned.

The North Seattle Industrial Association looks forward to the correction of these deficiencies when you publish the Final EIS.

Sincerely,

Eugene Wasserman
President, North Seattle Industrial Association

C-011-004

The analyses regarding how tolls might be implemented as part of the proposed action were preliminary for the 2010 Supplemental Draft EIS but have been updated for the Final EIS. They will be further refined during final design through a joint planning effort (described below) should the state legislature authorize tolls on the SR 99 Bored Tunnel. The analysis in the Final EIS represents a conservative estimate of the impacts of tolling the SR 99 Bored Tunnel. We anticipate that any effects due to applying tolls to the SR 99 Bored Tunnel will be notably less than those described in the Final EIS analysis.

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 establish a Tolling Advisory Committee to provide strategies for minimizing diversion impacts. Chapter 8 of the Final EIS further discusses the role and objectives of the Tolling Advisory Committee.

As part of the Bored Tunnel project and related projects, WSDOT and partner agencies have or will implement several strategies that should reduce the effects of potential diversion. For example, both the south and north portal configurations include bus priority lanes to provide reliable travel times for SR 99 transit service into and out of downtown. The streets that transition between SR 99 and the downtown street grid are designed in a manner that meets the City's Complete Street goals and include treatments for pedestrians, bicycles, freight, and adjacent land uses.

In advance of construction, WSDOT funded Intelligent Transportation

System (ITS) investments that provide improved signal operations and travel time information on SR 99 and city streets such as 15th Avenue NW that were likely to see increased volumes due to SR 99 construction activities. These investments will have lasting value. Supplemental transit services and transportation demand management were also implemented with assistance from the City of Seattle and King County, and these strategies can form the blueprint for future strategies.

C-011-005

In the Final EIS, Chapter 6 describes how construction would affect traffic, freight, and transit for each of the alternatives, and Chapter 8 describes mitigation measures. Appendix C, Transportation Discipline Report, contains additional details about the modeling and analysis of transportation effects during construction.

C-011-006

The Final EIS provides an adequate description of operations on Alaskan Way for decision-makers to make decisions related to traffic impacts associated with the Bored Tunnel Alternative. Extensive traffic analysis has been completed to present decision-makers with information to understand both positive and negative traffic effects related to the Bored Tunnel Alternative. This information is provided in both the 2010 Supplemental Draft EIS (including Appendix C) and the Final EIS.

It's important to know that conditions on Alaskan Way were evaluated assuming that Alaskan Way remain as it is today (that's the analysis contained in Chapters 5 of both the 2010 Supplemental Draft EIS and the Final EIS) as well as, what conditions are expected in 2030 once the central waterfront improvements (including Alaskan Way improvements and the Elliott/Western improvements) are constructed. That analysis is contained in Chapter 7 (cumulative effects) of both the 2010 Supplemental Draft EIS and the Final EIS (see also the cumulative

effects chapter in Appendix C). The baseline assumptions for the Alaskan Way improvements evaluated in the cumulative effects analysis assume the following:

- Alaskan Way would be six lanes wide between S. King and Columbia Streets (not including turn lanes) and four lanes wide between Marion and Pike Streets. The new street is expected to have sidewalks, bicycle facilities, parking/loading zones, and signalized pedestrian crossing at cross-streets.
- Elliott/Western Connector would be four-lanes wide between Pike Street and Lenora Street and would integrate back into the street grid at Bell Street.

C-011-007

The Supplemental Draft EIS and this Final EIS include current information on transit and the other projects listed in this comment. Regarding the Central Waterfront Project, the City of Seattle is leading that effort and is a co-lead agency for the viaduct replacement project. This ensures both project work from common assumptions and will be closely coordinated. Regarding transit, King County is a cooperating agency for the viaduct replacement project and its staff have been and will continue to be closely involved in planning and design.