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VIA ELECTRONIC MAIL

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

Re: Comments on Supplemental Draft Environmental Impact Statement
Alaskan Way Viaduct Replacement Project

Dear Ms. Freudenstein:

We are writing on behalf of Martin Smith, Inc., which manages the building located at 505 First Avenue ("505"), to provide the following comments on the Supplemental Draft Environmental Impact Statement (SDEIS) dated October 2010 for the Alaskan Way Viaduct Replacement Project (AVWR). 505 is the owner and developer of the new office building located at 505 First Avenue. 505 First Avenue is the most significant new office development completed in the Pioneer Square area in several decades, and 505 desires to ensure that the construction, design and operation of the AVWR and its components do not detract from this investment or the benefits it brings to the Pioneer Square area.

General Comments

The design, construction and location of the Tunnel Operation Building (TOB) at the South Portal will have a significant impact on 505 First Avenue. In previous communications with WSDOT and the Seattle Design Commission (SDC), we have emphasized that the TOB at this location should respond to the following criteria:

B-003-001

- Vent Stack location and design
  - Align vent stacks on the east/west axis at the south end of the proposed TOB site along the Dearborn Street right-of-way (as extended)
  - Minimize, as much as technically possible, the height of the vent stacks

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B-003-001

The design for the tunnel operations building has been developed to a conceptual level for analysis in this EIS. Part of the building would be constructed underground. The remaining portion of the building is expected to be approximately 60 feet tall, with ventilation stacks extending up to 30 feet above the roof. This means that the stacks would be approximately 90 feet above ground level. The ventilation stacks would be exempt from zoning height restrictions. The tunnel operations building could be designed to meet the requirements of the existing Industrial Commercial zone, Stadium Transition Area Overlay District, and other applicable land use code regulations. The building would be west of the Pioneer Square Historic District. The commenter's more specific design suggestions will be considered during final design of the building.

B-003-001

- TOB design renderings presented by WSDOT to the SDC should be implemented by the selected contractor

- Building location, design, and construction

  - Mass the TOB as far to the south on the proposed site as possible
  - Minimize the height of the north portion of the Vent Building as much as possible
  - Set back Vent Building from Railroad Way to allow view corridors and a wide pedestrian walkway
  - Ensure that access to the existing parking garage and loading bays at 505 First Avenue, and to the west service entrance to the 83 King building, are maintained on Railroad Way, with easy connections to nearby arterials
  - Design-build contractor shall coordinate with neighboring property owners to reduce construction, location, and design impacts
  - The building design should be sympathetic to, and compatible with, the Pioneer Square Historic District Design Guidelines

The SDEIS begins to address some of these design criteria in its visual simulations. The FEIS should complete the process of defining the TOB in a manner that is consistent with these criteria.

Specific Comments

B-003-002

505 also offers the following specific comments on the text of the SDEIS:

Page	*Comment*
94	The depiction of the building footprint of the Tunnel Operating Building is significantly larger than identified in the pre-EIS process or depicted elsewhere in the SDEIS. For example, the TOB footprint depicted in Exhibit A-7 of Appendix E is substantially smaller.
114	The visual simulation showing the Tunnel Operating Building at the South Portal (Exhibit 5-33) depicts five vertical stacks, four of which are aligned on the north/south axis, which is inconsistent with the more specific analysis contained in the SDEIS Appendices. The TOB depicted in Exhibits A-5 and A-7 of Appendix E (Visual Simulations) portrays a substantially smaller building with stacks aligned along the east/west axis, consistent with the narrative discussion in the SDEIS and the presentation of WSDOT to the Seattle Design Commission. Unfortunately, while the description of the TOB in the body of the SDEIS suggests that it will be approximately 65 feet in height, Exhibit 5-33 suggests that the structure (not including stacks) would be closer to 85 feet in height. Exhibit 5-33 should be revised to reflect a structure height that is no greater than 65 feet. It should also be noted that elsewhere in the SDEIS, the TOB is described as not greater than 60 feet in height (Appendix B, page 18; Appendix G page 48).

B-003-002

Please see the Final EIS for updated text and exhibits, which have been revised for consistency.

We appreciate the opportunity to provide these comments on the SDEIS. Please do not hesitate to contact us if you have any questions about these comments.

Sincerely,

John C. McCullough

JCM/ldc

cc: Martin Smith, Inc.