



August 15, 2011

Angela Angove  
Alaskan Way Viaduct Project Office  
999 Third Avenue, Suite 2424  
Seattle, WA 98104

RE: Comments on Alaskan Way Viaduct Replacement Project Final EIS

Dear Mrs. Angove,

**O-003-001**

In December 2010, the Pike Place Market PDA submitted comments on the Supplement Draft A WVRP EIS. Since then, we have conducted several follow-up meetings with Project staff and directors and WSDOT representatives to address concerns and mitigate impacts to the Market. These meetings have been extremely productive and informative. In addition, we received your detailed response to our initial letter and want to convey our great appreciation for your consideration of the potential impacts that we feel may threaten current Market operations and character of this protected historic resource. Unfortunately, we do not think that the EIS analysis and mitigation is yet adequate to protect this treasured historic resource of Seattle.

After we reviewed and considered the correspondence mentioned above, a pronounced concern still remains for potential impacts on the Market. Given the historic nature and complexities inherent to the Market, we strongly urge that extensive consideration for mitigation should be granted. These complexities, as detailed within our Charter, consist of a large number of sensitive populations that include our Senior Center, Child Care and Preschool, Food Bank and low-income/HUD residential housing. In addition to potential construction impacts on our social services and vulnerable resident populations, the Market also supports a large number of small, marginal businesses that require constant vigilance and even the slightest disruption could potentially wreak havoc on their operations if impacted for even a short amount of time. Moreover, as a treasured National Register Historic District, we are disappointed that the potential impacts to the Market were overlooked in the EIS.

The Pike Place Market PDA respectfully urges the reconsideration of the impacts to the Market and mitigation to the following areas:

### **O-003-001**

Thank you for your acknowledgement of the collaboration and dialogue that we have had with the Pike Place Market PDA. FHWA has considered and documented expected impacts from the proposed action and we believe that the mitigation proposed in the Final EIS and Record of Decision is sufficient. Specific responses to the comments provided by the Pike Place Market PDA's requests are provided in the responses below.

O-003-002

1. **Parking and Traffic:** There will be a permanent loss of parking at two surface lots (Lenora and Blanchard) as well as long-term accessibility impacts to our parking garage from the waterfront. This begins with the demolition of the viaduct through substantial completion of waterfront improvements and planned construction of the Elliot and Western arterial/connector and designated freight corridor immediately adjacent to the western edge of the Market. The high volume of anticipated through traffic could impede pedestrian and vehicle access to the Market from the west, where the lower entrance (essential to ingress and egress) to our parking garage and elevator are located. Parking is critical to the service of guests and support of commercial and non-profit operations in the Market. Annual gross revenue from our surface lot operations alone (PC1N, Blanchard and Lenora) is in excess of \$600,000 without including any potential revenue from our garage.

O-003-003

2. **Cumulative Long-term Construction Impacts to Historic Resources:** The Alaskan Way and Viaduct Replacement Project and associated major construction projects in aggregate present several years of continuous and cumulative significant disruption, as well as economic and environmental impacts to the Market's small businesses and social functions. Though the Historic District was acknowledged in Appendix I, the assessment doesn't go nearly far enough in addressing the potential long-term cumulative impacts to the Market. Beyond the Viaduct demolition, the seawall replacement and other related construction projects constitute a full program of cumulative effects. Thus, the bored tunnel alternative does pose construction impacts contrary to the finding in Exhibit 6-1 of Appendix I which state "no construction effects." The Market should have been, and still should be, a party to any Memorandum of Understanding entered into under Section 4(f) and Section 106.

O-003-004

3. **Resident, Social Service and Business/Economic Impacts:** The functionality of the Market also includes a large number of senior residents, low-income residents, childcare services and multiple social service programs. In particular, the Market is very concerned about the impacts on our Child Care playground, Senior Center, and Food Bank, which are all located in close proximity to the Viaduct would all be adversely affected by the construction and demolition over extended periods.

O-003-005

4. **Proposed location, traffic volumes, freight corridor designation and configuration of the proposed Elliott and Western Connector to Alaskan Way surface arterial:** We concur with the statement made in the July 5, 2011 letter from WSDOT Director of Operations Kimberly Farley that, "...as we discussed, Seattle Department of Transportation (SDOT) will construct arterials that may have some impact. The Central Waterfront Project, which is currently in the planning stages, would repurpose the area after the viaduct is demolished. This work, lead by SDOT, has not undergone environmental review." We also note a potential for increased volumes of diversion traffic from tolling of the tunnel that would seek to use this corridor, yet no alternative transportation plan or mitigation have been proposed. We believe that this EIS should identify these

## O-003-002

The Project would not result in a permanent loss of parking in these surface lots (Blanchard/Lenora). After the viaduct demolition work over these lots is completed, these surface lots could be re-opened. The completion of all demolition activities in the Market area would occur in 2016 within a period of approximately 6 to 8 weeks.

Long-term accessibility impacts to the Pike Place Market parking garage are not expected. Access to this garage will not be affected during construction because of its location away from Bored Tunnel construction activities.

Traffic volumes in the project's built condition are not anticipated to impede pedestrian or vehicular access to the Market from the west; nor would access to the Market's parking garage or elevator be impeded.

## O-003-003

Construction effects are discussed in Chapter 6 and cumulative effects are discussed in Chapter 7 of the Final EIS. Cumulative effects specific to historic resources are discussed in Chapter 7, Question 12 of the Final EIS. Further discussion of cumulative effects specific to historic resources as a result of the Bored Tunnel Alternative can be found in Chapter 7 of Appendix I of the 2010 Supplemental Draft EIS.

WSDOT has met with the Pike Place Market PDA concerning this project on seven occasions. FHWA has received comments from the Pike Place Market PDA concerning the 2010 Supplemental Draft EIS, which described the Bored Tunnel as the preferred alternative. The Pike Place Market PDA never requested to become a Section 106 consulting party. During the Section 106 consultation process, FHWA and WSDOT approved every request received in writing to become a Section 106 consulting party. The City of Seattle, who chartered the Pike Place Market PDA and administers the Pike Place Market Historical

O-003-005

impacts now as part of the cumulative and induced effects required to be studied under NEPA and SEPA. We do not believe these related actions can be properly segmented from this environmental review. We are particularly concerned that no alternatives for the connector street project have been studied in this document. It is difficult to understand how the state and federal decision-makers relying on this EIS can make decisions without completion of the environmental review for the connector streets, as the impacts caused by the diversion of local and freight traffic is admittedly significant. We respectfully ask that supplemental environmental review be conducted now, and that the Market be part of the stakeholder group that is involved in the environmental review process.

O-003-006

The Pike Place Market PDA would like to reaffirm our support for the bored tunnel alternative and we do appreciate your consideration of our concerns. We understand the difficulties in correctly gauging the impacts of this massive project and know how intricate a balance it can be to please all entities involved. It is for this reason that we are making an assertive effort to illustrate our areas of concern that have not been thoroughly addressed to date. The Pike Place Market is one of the most-- if not *the* most--treasured asset of the City of Seattle. Protection of this resource must be of paramount importance during the environmental review and permitting process.

Sincerely,



Ben Franz-Knight  
Executive Director

cc: Pike Place Market PDA Councilmembers  
Market Historical Commission  
Director of SDOT – Peter Hahn  
Director of DPD – Diane Sugimura  
Director of DON – Bernie Matsuno  
T, Ryan Durkan, HCMP

Commission, is a Section 106 consulting party and the City Historic Preservation Officer is a concurring party to the Section 106 Memorandum of Agreement for the project.

**O-003-004**

For the Bored Tunnel Alternative, demolition of the viaduct would take approximately 9 months. The viaduct would be demolished in two-block segments, with each segment taking no more than 4 weeks. Construction of the bored tunnel in the vicinity of Pike Place Market would include tunnel boring, which would include underground activities. Access will be maintained to social resources during viaduct demolition. Please see Chapter 6, Questions 23 and 24 of the Final EIS for a discussion of effects on social resources and low-income and minority populations during project construction.

**O-003-005**

The Elliott/Western Connector is not part of the proposed project evaluated in the Final EIS. The Elliott/Western Connector is a separate, independent project as described in Chapter 2, Question 9 of the Final EIS that will be examined through a separate environmental process. The Final EIS evaluated the cumulative effects of other reasonably foreseeable projects, such as the Elliott/Western Connector in Chapter 7 of the Final EIS. Additionally, Appendix C, Transportation Discipline Report, Chapter 8 evaluates potential cumulative transportation effects of the proposed project in conjunction with other reasonably foreseeable projects, including the Elliott/Western Connector. More specifically, Section 8.2.4 of Appendix C discusses traffic operations at key intersections for the proposed project in conjunction with the Elliott/Western Connector and other reasonably foreseeable projects.

**O-003-006**

Thank you for your continued support and cooperation. We appreciate

your continued efforts and our responses to your concerns have been included in the Record of Decision.