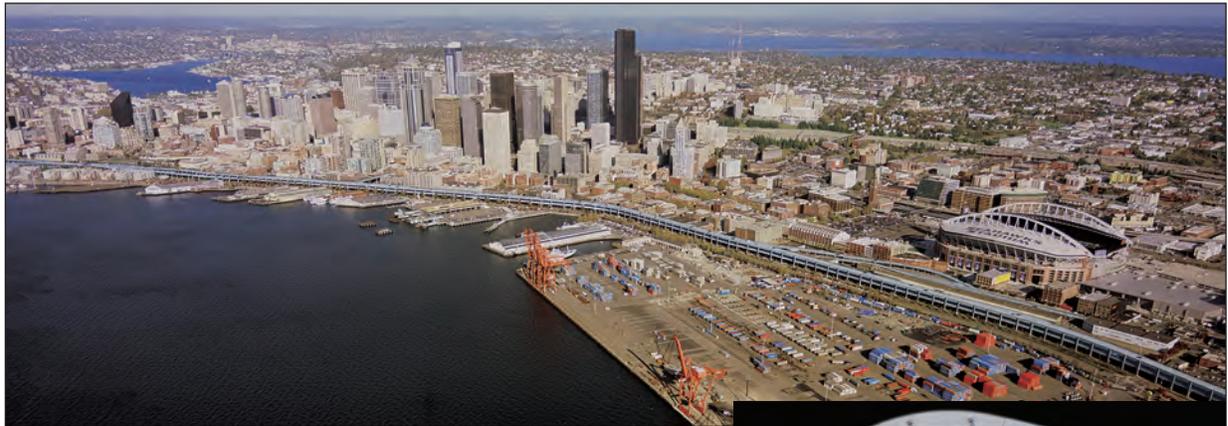
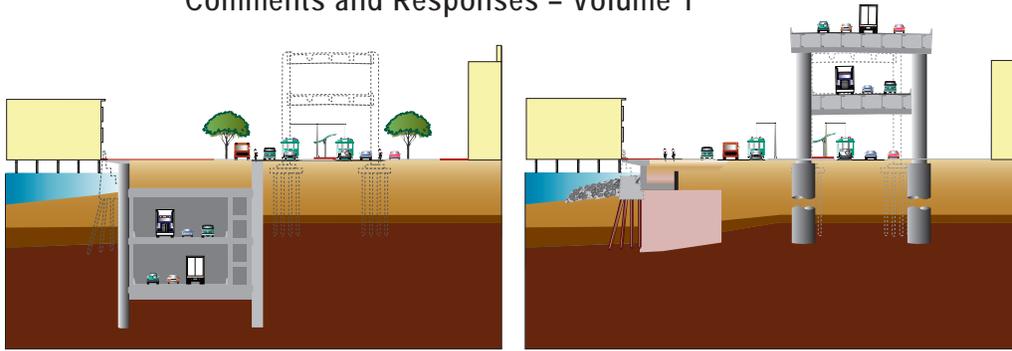


ALASKAN WAY VIADUCT REPLACEMENT PROJECT

Final Environmental Impact Statement

APPENDIX S 2004 Draft EIS and 2006 Supplemental Draft EIS Comments and Responses – Volume 1



Submitted by:
PARSONS BRINCKERHOFF

Prepared by:
PARAMETRIX



JULY 2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

RECEIVED
JUN 07 2004
AWSP Team Office

June 2, 2004

Reply To
Attn Of: ECO-088

Ref: 01-050-FHW

Federal Highway Administration
Attn: Mary Gray
711 South Capitol Way, No. 501
Olympia, WA 98501

Washington Department of Transportation
Attn: Allison Ray, Environmental Coordinator
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Mssrs. Gray and Ray:

The U. S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed **SR 99 Alaskan Way Viaduct & Seawall Replacement Project** (CEQ No. 040159), dated March 2004, in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements

F-001-001

Based on our review and evaluation, we have assigned a rating of LO (Lack of Objections) to the draft EIS. This rating, and a summary of our comments, will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference.

First, we commend you on a very thorough, well-executed search for project alternatives. The work that your project team presented to the Resource Agency Leadership Forum (RALF), the Interagency working group for this project, from initial screening of goals and concepts to the final determinations of alternatives for analysis in the EIS, showed both the creativity and flexibility required for the complex Central Seattle waterfront site, with all of its limitations. In addition, all of your proposed alternatives incorporate multi-modal transportation features such as enhancements to existing facilities for non-motorized transportation, and expanded efforts to improve transit and reduce single-occupancy vehicle trips.

F-001-002

We have learned from information presented by the project team that a large volume of public comments have been received advocating dismantling of the existing Viaduct and no construction of a replacement tunnel, viaduct or surface street. This is distinctly different than

F-001-001

Thank you for sharing your thoughts and comments related to our work to develop and screen a broad range of alternatives. We appreciated EPA's contribution to the Resource Agency Leadership Forum (RALF), and your continued participation as the project has moved forward. We acknowledge EPA's rating of Lack of Objections to the Draft EIS.

F-001-002

Some public comments requested that the lead agencies study the possibility of not replacing the viaduct. The lead agencies responded to this request by initiating a study to determine whether a no replacement viaduct concept was feasible. This study, called the AWW No Replacement Concept, was made available to the public and shared with EPA and other agencies.

The study assumed the viaduct would be replaced with a four-lane surface street on Alaskan Way. It also assumed that transit would be increased, improvements would be made to the downtown street system, transportation demand management strategies would be employed, and some changes would be made to I-5. Even with the most optimistic assumptions, the study found that city streets, I-5, and surface Alaskan Way would be severely congested from early morning until late evening.

- Traffic on surface Alaskan Way would quadruple along the central waterfront; 35,000 to 56,000 vehicles per day would use this section of roadway compared to about 10,000 today. Increased traffic would not create a livable and pedestrian-friendly waterfront for residents and tourists.
- Downtown street traffic would increase by 30 to 50 percent, with the greatest increase in Pioneer Square and on the waterfront. City streets would be congested for much of the day.
- Vehicle demand on I-5 would grow by 24,000 - 33,000 vehicles per

F-001-002

the no-action alternative you have described in the EIS because it proposes dismantling the Viaduct deliberately, and planning for alterations or expansion of other streets in the downtown area to replace traffic capacity from the Viaduct. Since this is a proposal not analyzed in the draft EIS, we recommend that the Final EIS address the effectiveness of this alternative in achieving the project purpose and need so that the public and the decision makers may have a final opportunity to evaluate how it compares to other alternatives prior to selection of the preferred alternative.

Hazardous Waste

F-001-003

In our scoping comments, we discussed our concerns with the handling of hazardous materials as an incidental part of construction of a replacement or rebuilt Viaduct. This could include sediment, groundwater, and construction process water. The project team has since taken major steps toward identifying locations where hazardous material is likely to be located, what contaminants are likely to be present, and how such material might be treated, remediated, or controlled in place, transported and disposed, and which entity(s) would be responsible for these tasks. We appreciate your successful efforts to resolve these questions at the earliest possible time.

Native American Coordination

F-001-004

We advised the lead agencies in our scoping comments to consult early with potentially affected Native American Tribes for their views on the effects of this project on Tribal treaty fishing areas. The EIS does a thorough job of documenting the coordination with potentially affected Tribal groups in regard to archeological sites and important cultural places, but the EIS should also include information on whether treaty fishing areas may be potentially affected and whether Tribes have been consulted. As we noted in our scoping comments, if Tribes report issues such as precluded access to tribal fishing, the Federal government may have to resolve this through government to government consultations, consistent with our trust responsibility to Native Americans, prior to the initiation of construction.

Effects on Aquatic Resources

F-001-005

In our scoping letter of February 2002, we suggested that you "consider including aquatic habitat restoration as an additional part of the purpose and need statement. Habitat restoration ...may become an integral part of the project, requiring considerable effort and planning." The draft EIS states that all alternatives would include restoration of habitat functions along the central Seattle waterfront to mitigate project effects, and that enhancements beyond those required for mitigation might be undertaken to restore habitat functions that no longer exist along the shoreline.

The project team organized a conference during scoping in which experts on marine habitat in central Puget Sound presented a wealth of information on current research and opportunities for habitat enhancement and restoration in the project vicinity. While it is not yet certain if the U.S. Army Corps of Engineers will also be a lead agency for the seawall portion of this project and at least partially responsible for determining aquatic resource mitigation requirements, plans for habitat enhancements, particularly if needed for mitigation, are more

day. This is in addition to the nearly 70,000-vehicle increase predicted due to population and commercial growth in the region by 2030. I-5 does not have room for trips from the viaduct corridor because it is already congested for much of the day and into the evening.

- Access to and from many Seattle neighborhoods would be reduced by degraded traffic conditions downtown. Ballard, Queen Anne, Magnolia, and West Seattle would be greatly affected.

Based on these findings, the lead agencies determined the no replacement concept clearly does not meet the project's purpose and need statement, "that maintains or improves mobility and accessibility for people and goods along the existing Alaskan Way Viaduct Corridor."

F-001-003

The project team has continued to study contamination in the project corridor to determine construction mitigation measures. Please refer to Chapter 8 of the Final EIS for information on construction mitigation measures related to hazardous waste.

F-001-004

The lead agencies have consulted with the Tribes on tribal fishing and other issues as the project has progressed. Information learned from these discussions is contained in the Final EIS. The design team has expended considerable effort to redesign the Cut-and-Cover Tunnel Alternative to minimize the amount of in-water work, thereby minimizing the potential effects of the project on Native American fishing rights. The lead agencies will continue to consult with the federal agencies and the Tribes to ensure coordination throughout the project.

The preferred Bored Tunnel Alternative does not include any in-water work that would necessitate impacts to tribal fishing activities or areas.

F-001-005 likely to be successful if developed and funded early. We encourage you to continue these advance efforts to explore habitat enhancement as your agencies make decisions on what to construct and who will construct it. We suggest that the Final EIS propose a conceptual mitigation plan and funding mechanism that decision makers can commit to pursuing as this project moves toward construction.

EIS Format

F-001-006 Your agencies have made a determined effort to fundamentally revise the traditional format used for EISs, to make this EIS more readable, accessible and understandable to the public. We wish to commend you for the time and resources you devoted to making your vision a reality. In large measure, we think you have succeeded. Our comments on format are meant to be helpful to you in preparing the Final DEIS.

The purpose of NEPA is not to generate excellent paperwork, but to foster excellent action. There is no question that many EISs have become overly long and difficult for readers to understand. In revising the EIS format, there is a balancing act between presenting information in an accessible format to achieve meaningful public participation and including enough detail to provide decision makers with the information they need, as well as having enough depth in topic areas so that agencies with statutory jurisdiction or special expertise can provide accurate comments.

The alternatives Section, as the CEQ regulations conceived them, would be the heart of the EIS, sharply defining the issues and providing a clear basis for choice. Chapter 2 of the EIS presents the alternatives and briefly covers some of the impacts, but there is limited basis for comparison between them. One solution that would maintain brevity is to develop a table that compares and summarizes impacts by alternative to conclude the Chapter.

The impacts to each affected resource from the physical or human environment are now described in five Chapters instead of one, complicating the comparison of alternatives. As an example, if reviewers want to compare the impacts of each alternative on water quality, they must cross-reference five different Sections on water quality, one in each Chapter. We recommend that the environmental impacts to the alternatives be presented in one Chapter, rather than broken into five separate Chapters, by alternative. The present format also separates basic information on the alternatives (Chapter 2) from the description of how each alternative performs after construction (Questions 1 - 8 in Chapters 5 - 9).

Finally, some valuable and important information is only found in the Discipline Reports, (Appendices) and not summarized in the main report. For example, the Hazardous Waste Discipline Report contains an excellent discussion of potential problems that may be encountered in the handling of hazardous materials during construction, existing technologies to remedy these problems, and possible areas for further data collection. The EIS should contain concluding statements that briefly reflect this information and describe, if appropriate, how the environmental impact of the handling of hazardous wastes might therefore differ under the proposed alternatives.

F-001-005

The lead agencies will continue to work closely with resource agencies through the environmental review and permitting process. We appreciate the positive contributions EPA staff have made to the project and hope they will continue to participate. As suggested by the comment, mitigation for habitat impacts is presented in more detail in the Final EIS where appropriate. However, the term conceptual mitigation is not well-defined and is often interpreted differently by various parties. The project's intent is to show project impacts can be mitigated and potential habitat enhancements provided at a level of detail commensurate with the decision at hand.

F-001-006

Thank you for your encouraging comments about the format of the Draft EIS. We appreciate your ideas on how we can improve on the format of the Draft EIS. These ideas will help us to refine the reader-friendly approach for future documents.

We think Chapter 2 of the Draft EIS does a good job comparing the alternatives and highlighting key issues and trade-offs. This chapter contains important information that distinguishes and compares the alternatives. We chose not to develop a table because it would have been unwieldy due to all the information it would need to convey, and it would not have been as effective as the combination of graphics, tables, and text we created to compare the alternatives. We will strive to incorporate tools into the summary chapter that will help make key issues and comparisons clear for all audiences as we continue to refine and further develop more reader-friendly EIS formats.

We appreciate your comment related to document organization and format. Federal and state environmental regulations and guidance give project proponents flexibility in how EIS documents are organized, and we recognize there are many trade-offs associated with how EISs are

Thank you for the opportunity to provide comments on this project. If you would like to discuss this letter, please contact Jonathan Freedman of my staff at (206) 553-0266.

Sincerely,



Judith Leckrone Lee, Manager
Geographic Unit

Enclosure

cc: Tom Eaton, EPA WOO
Army Corps of Engineers, Regulatory Branch
Terry Swanson, WSDOE
Bob Donnelly, NMFS
Jennifer Bowman, DOT

organized. After thinking about the trade-offs, our team decided to "tell the story" of each alternative as a separate chapter. We did this because several alternatives and options were evaluated. By separating the alternatives discussion into five chapters, we were able to give readers a clear picture of how each alternative would affect various aspects of the environment. We developed Chapter 2, the Comparison of Alternatives chapter, to help readers easily compare the alternatives. Information that distinguishes the alternatives and highlights key issues are compared in Chapter 2. Much of the information contained in Questions 1-8 in Chapters 5-9 is summarized in some form in Chapter 2, specifically questions 3-14. We acknowledge that this EIS approach may make review more difficult for some. The index on page 161 outlines a more traditional EIS format and shows readers where they can quickly find the information they are looking for. The lead agencies considered your comments as outlines for future EIS documents were developed.

We acknowledge your comment regarding coordination between the technical reports and the main body of the EIS. We strive to strike a reasonable balance between the extensive technical information in the discipline reports and what is brought forward into the main EIS. The Final EIS refers readers to the technical reports if they are interested in additional information on a particular subject.

U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action*

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.



U.S. Department
of Transportation
Federal Transit
Administration

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RECEIVED
JUN 01 2004
AWWSP Team Office

May 28, 2004

Allison Ray
WSDOT Environmental Coordinator
AWV Project Office
9993rd Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Ray:

The purpose of this letter is to provide you with comments from the Federal Transit Administration (FTA) on the SR 99: Alaskan Way Viaduct & Seawall Replacement Project Draft Environmental Impact Statement (DEIS). As you are aware, FTA is a federal cooperating agency for this National Environmental Policy Act (NEPA) analysis. As such, FTA would typically review the EIS for transit-related impacts. However, given the dramatic style change for this document and understanding that the Washington State Department of Transportation (WSDOT) may wish to use a similar approach for future NEPA documents that may have FTA as a federal lead or co-lead agency, we have reviewed the DEIS in greater detail.

We commend WSDOT and FHWA on the new approach. We appreciate your consideration of the attached comments and look forward to continued collaboration on transportation projects in Washington. Please contact Jennifer Bowman at 206.220.7953 if you have any questions.

Sincerely,

R.F. Krochalis
Regional Administrator

Enclosure

cc: Kim Farley, WSDOT
Carol Lee Rolkvam, WSDOT
Sharon Love, FHWA

Federal Transit Administration Comments
SR 99: Alaskan Way Viaduct & Seawall Replacement Project
Draft Environmental Impact Statement

General

F-002-001 The document makes good use of graphics and has good style and tone. The new format seems to be more readable for the general public. While we are encouraged by the new approach and abbreviated length geared toward the general public audience, we are concerned that the document may not have suitably balanced the information needs of various federal, state and local agencies that use NEPA documents to determine compliance with applicable laws and as supporting material for permitting actions. With this new approach, it becomes necessary to review nearly 3500 pages of appendices to understand what is supporting the generalized statements in the DEIS. Because the document lacks some of the more traditional tables and impact summaries, reviewing this EIS required significantly more time than under the normal approach. We have included below, several ideas for your consideration to continue to improve the quality and format of environmental analyses.

In an introductory section, or perhaps in an executive summary, one suggestion would be to include an explanation of how this EIS differs from previous EIS reports, what things remain the same and how the reader can find information on specific topical interests. Similarly, more detail in the table of contents would help the reader find specific information and make comparisons between alternatives.

Because this new format lacks the standard numbering convention, FTA found it difficult to follow an impact category through each alternative, construction impacts and mitigation. FTA recommends that the questions be grouped into categories and listed in the table of contents for each alternative, construction impacts and mitigation. In addition, a summary of impact areas for all alternatives, presented in a tabular or matrix format, would be helpful.

For main impact categories with associated federal or state laws, it would be helpful to present the reader with a brief description of applicable regulatory standards and thresholds. Enough detail should be given to clearly demonstrate compliance or the methodology to gain compliance.

The DEIS indicates that the FEIS will include detailed mitigation plans for several impact categories for the preferred alternative. Since the FEIS will be the first time that the public and agencies will have an opportunity to review these mitigation plans, FTA recommends that the ROD respond to any comments received on these plans.

F-002-002 The DEIS does not clearly state the process for determining the preferred alternative. The FEIS for this project should describe how the decision was made. Future documents that take this approach should include a description of the decision-making structure and process.

F-002-001

Thank you for providing your agency's ideas and feedback about the format of our 2004 Draft EIS. We appreciate your helpful suggestions and have incorporated many of them into the 2006 and 2010 Supplemental Draft EISs and Final EIS.

As suggested, we added a more detailed Table of Contents to the Supplemental Draft EISs and the Final EIS. In the 2004 Draft EIS, we developed two tools to help guide regulatory reviewers through the document: a technical index (see page 161 of the Draft EIS) and an annotated outline with legal references (see Appendix Y of the Draft EIS). These tools are also contained in the 2006 and 2010 Supplemental Draft EISs. The technical index is organized by NEPA/SEPA required topics (such as logical termini, cumulative effects, and historic resources) and page numbers to help direct reviewers to NEPA/SEPA required information by topic. This index and the detailed Table of Contents are included in the Final EIS.

We considered your comments related to mitigation planning as we developed the Final EIS. The lead agencies have been working closely with the public and regulatory agencies to develop and discuss mitigation plans. This dialogue will continue through the environmental review process and, as needed, throughout construction.

F-002-002

The environmental scoping process, screening process, and overall decision-making structure was discussed in the 2004 Draft EIS in Chapter 4. Additional information on this topic was provided in Chapter 2 of the Supplemental Draft EIS published in 2006. The Summary chapter of the Final EIS contains information describing the decision-making process used to select the preferred alternative.

- F-002-003** **Air Quality--Construction**
FTA understands that the FEIS will present an analysis of construction pollutant emissions in the FEIS. Given that the highest rates of air pollution emissions are generated by diesel powered construction equipment and marine vessels that may be used to support maritime construction operations and the construction period will exceed eight years, we request that the FEIS also describe the emissions reduction strategies to which the project will commit. In addition, since this information was not included in the DEIS, FTA requests that any comments received on air quality impacts during the construction period as presented in the FEIS be addressed in the ROD.
- F-002-004** **Alternatives**
Page 55 states that screening tools were used in evaluating ideas for the alternatives. The FEIS should describe the screening process in greater detail.
- F-002-005** **Bike and Pedestrian Access and Safety**
The FEIS should present a map showing bike and pedestrian routes throughout the project area for the construction period and for the finished project. This should include the SR 519 area, the Waterfront Trail and access to Colman Dock.
- F-002-006** **Businesses**
FTA encourages the project sponsors to present in the FEIS a mitigation plan with detailed strategies for mitigating construction impacts to the local businesses especially with respect to access both from the land and water. FTA also recommends that the ROD respond to any comments received on these plans.
- F-002-007** **Environmental Justice**
Since a detailed EJ analysis will not be available until the preferred alternative is presented in the FEIS, FTA recommends that the ROD respond to any comment received on this topic.
- F-002-008** P. 68, question 13 states that Casa Latina will be relocated. Given the difficulty associated with the original siting of this facility, have any feasible relocation alternative been identified?
- F-002-009** **Ferries**
Since the proposed project will significantly change access to Colman Dock, the FEIS should provide detailed information, including a map that shows ingress and egress for the ferry terminal, including pedestrian access, and the auto holding areas.
- F-002-010** **Financial Analysis**
FTA considers it helpful for agencies and the public to have more information on the financial analysis of the project, including construction, maintenance and financing options for the project. FTA recommends that the FEIS present more financial information on the preferred alternative.
- F-002-011** **Fisheries, Wildlife and Habitat**
Page 49 states that the Department of Ecology has designated Elliott Bay as excellent in terms of goals for quality and aquatic life. Similar information is not presented for the other water bodies in this section. It would help the reader understand the context and significance of this if similar information were presented for all water bodies in the project area and if the significance of these designations were explained. A general overview of applicable standards would be helpful.

F-002-003

A Memorandum of Agreement (MOA) has been developed between WSDOT and the Puget Sound Clean Air Agency (PSCAA). The MOA will help eliminate, confine, or reduce construction-related emissions for WSDOT projects. This MOA will apply to the Alaskan Way Viaduct Replacement Project. Chapter 6, Construction Effects, of the Final EIS for discussion of the effects during construction of the build alternatives and Chapter 8 presents the proposed mitigation measures.

F-002-004

The 2004 Draft EIS incorporated by reference the screening reports that discussed the screening process in detail. Specifically, the sidebar on page 56 in Chapter 4 of the Draft EIS referenced readers to the project screening reports if they are interested in learning more about the screening process. The screening process involved early analysis by the project team and discussions with community groups at more than 140 community meetings and community interviews, including businesses along the corridor. A total of 76 initial viaduct replacement concepts and seven seawall concepts were considered; and concepts that were not feasible, or were outside the purpose of the project were dropped from further consideration. The most workable ideas were shaped into the alternatives analyzed in the Draft EIS. Further screening and analyses were conducted for the 2006 and 2010 Supplemental Draft EISs and Final EIS. The alternatives analyzed include a range of viaduct repair and replacement designs with some elements of earlier concepts combined with other design structures as the engineering team looked at feasibility, cost, and other criteria.

F-002-005

The Transportation Discipline Report, Appendix C of the Final EIS, provides maps showing alternate pedestrian and bicycle facility routing during project construction as well as final configuration of the facility.

- F-002-012** FTA does not understand the basis for the preliminary “not likely to adversely impact” determination for Chinook salmon and bull trout that is presented in Appendix R. As a cooperating agency, please keep us informed as you go through the section 7 consultations.
- F-002-013** **Haul Routes**
Haul routes are unclear. If either of the tunnel alternatives is chosen, haul routes will be very important. FTA recommends that the FEIS present a detailed analysis of the haul routes and impacts thereof if either tunnel option is chosen.
- An analysis of marine construction and supply provisioning options versus land-based techniques should also be presented.
- F-002-014** **Historic Resources**
FTA is required to analyze the impacts of public transportation projects on park resources as required by 49 U.S.C. 303 Section 4 (f) and 23 Code of Federal Regulations 771.135. In the FEIS, FTA would like to see how the new pier between pier 46 and Colman dock would impact the footprint of the Washington Street Boat Launch. The actual footprint of the park in its current location is unclear. Will the in-water portion of this park resource be extended to keep its original size or will the in-water portion simply be covered up? This may have an impact on passenger-only ferry routing and docking. FTA would like to see a delineation of the park resource with the new project in place.
- Maps and Graphics**
The EIS’s use of visual simulations and graphic is very helpful.
- F-002-015** More detailed maps would help the reader understand the project and its impacts better. A compromise between the DEIS general level and the Appendix W would be helpful for the FEIS.
- Travel times are given to and from “downtown” but FTA was unable to determine how this is defined. Please clarify this in the FEIS.
- P. 9 Average Traffic Speeds graphic. We have assumed that the year of analysis is 2030, but it is not clear. This comment applies to similar maps and graphics throughout.
- P. 23 describes the detour options. Please include a detailed map of the planned detour in the FEIS.
- P. 65 (and generally Question 5 for all alternatives) discusses freight access. Please include in the FEIS maps showing interchanges at S. Atlantic Street and S. Royal Brougham Way that are stated to improve access between SR 99 and SR 519.
- P. 88 describes new ramps, railroad access and ferry access. Please include a map that shows these movements in the FEIS.

F-002-006

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. A primary goal of construction planning is to maintain adequate access to all businesses so they can continue to operate. Chapter 8 of the Final EIS discusses the project's proposed mitigation measures during construction.

Economic mitigation strategies for other types of impacts to businesses during construction are presented in the Final EIS. These start at the corridor level with a master list of potential mitigation measures (similar to that contained in the Draft EIS). Those measures will then be matched with specific impacts by business district (Stadium Area Interchange, Pioneer Square, central waterfront, etc.). Finally, as construction nears, the plan would be fine-tuned by phase and specific business/facility impacts and location.

Any substantive comments received on the Final EIS will be addressed in the ROD.

F-002-007

The preferred alternative was disclosed in the 2010 Supplemental Draft EIS, which included an environmental justice analysis and determination. The Record of Decision will report on comments received on the Final EIS, and will respond appropriately.

F-002-008

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

WSDOT will comply with the federal requirements for disadvantaged

F-002-015	P. 92 discusses traffic impacts on other parallel city streets. The last paragraph on this page is confusing. A map would help.
F-002-016	<p>Noise</p> <p>What mitigation is proposed for residential properties during the construction period? What consideration has been given to nighttime construction noise traveling over water? How might residences in West Seattle be impacted? Does the project propose limiting the kind of construction activities that will be allowed through the night?</p>
F-002-017	<p>Parking</p> <p>To better understand the magnitude of parking impacts, it would be helpful to know how many spaces are currently available in each sub area for each kind of parking. The sentence immediately following Question 7 (p 66 and subsequent sections for each alternative) seems inconsistent with the last sentence in the second paragraph of this section (2,038 spaces versus 2,800 spaces).</p> <p>FTA encourages the project sponsors to coordinate with transit providers, vanpools, carpools and the flex car program in developing the parking mitigation plan that is to be presented in the FEIS.</p>
F-002-018	<p>Public Services</p> <p>All build alternatives propose relocating Fire Station #5. Will this station be relocated and operational during the construction period? FEIS should identify the new location or possible locations.</p>
F-002-019	<p>Relocations</p> <p>Question 14 in each alternative deals with property acquisition. The DEIS states that “No residences would be affected.” Certainly residences in the project area will be affected by noise, limited access and constant changes in traffic patterns. Perhaps clearer wording would be “No residences would be acquired.”</p>
F-002-020	<p>Staging Areas</p> <p>The DEIS states that the City-owned property west of the Battery Street Tunnel will be used for construction staging. What are the other staging areas? The FEIS should describe all potential staging areas.</p>
F-002-021	<p>Surface Alternative</p> <p>Surface Alternative is the least costly alternative. It moves the fewest vehicles at the slowest pace and has the potential to create significant congestion impacts in the downtown and on I-5. If this were to be selected as the preferred alternative, the FEIS should describe the transit components that would be necessary to maintain a functioning metropolitan transportation system with an agreed upon level of service needed to support commerce and a high quality of life for the public.</p> <p>If the Surface Alternative is chosen as the preferred alternative, FTA recommends that a quantitative assessment of general traffic, transit and air quality impacts to I-5 and mitigation</p>

business enterprise (DBE) participation. WSDOT cannot require contractors to hire workers from specific organizations. However, WSDOT can and does encourage contractors to work with local organizations and to develop programs that draw on the local labor pool.

F-002-009

The exact changes in access to Colman Dock as a result of this project are not yet determined and, therefore, are not shown in the Final EIS. If the preferred Bored Tunnel Alternative is selected, the final configuration of Alaskan Way will be determined as part of the City of Seattle's Central Waterfront Project. However, the project will continue its coordination work with Washington State Ferries for any developments affecting Colman Dock during the project's construction.

F-002-010

Overall project costs are included with the project description and are used for the analysis of economic impacts. Cost estimates for mitigation are included in the overall project costs. These estimates, along with other cost estimates, are refined as the planning and design process proceeds and details are developed. All cost estimates allow for escalation and inflation and include contingencies for unforeseen events. The project is included in the financially-constrained long range plan adopted by the Puget Sound Regional Council (the area's Metropolitan Planning Organization, or MPO). Cost estimates for the alternatives evaluated in the Final EIS are:

- Bored Tunnel – \$1.96 billion
- Cut-and-Cover Tunnel – \$3.0 to \$3.6 billion
- Elevated Structure – \$1.9 to \$2.4 billion

These cost estimates do include different elements. The Bored Tunnel Alternative cost does not include replacing the seawall, improving the Alaskan Way surface street, or building a streetcar. Costs for the Cut-

F-002-021 | commitments be presented in the FEIS. In addition, since this information was not included in the DEIS, FTA requests that any comments received on this matter be addressed in the ROD.

F-002-022 | **Transit**
FTA is very interested in the Flexible Transportation Package. Since many of its elements may be eligible for FTA funding, we request that the project sponsors and transit providers coordinate with FTA as this is developed.

All alternatives remove the Waterfront Streetcar during the construction period. One possible way to mitigate this loss would be to use a rubber-tired transit vehicle as an alternative for the duration of the construction period. This option would not only provide safe and controlled passage over an ever changing right of way through a construction zone to pedestrians, customers of waterfront businesses and residents, but could provide mobility for project work crews given limited on site parking.

F-002-023 | Appendix J: Environmental Justice
Page 3 states, "the City of Seattle will take measures to ensure that transit service in Downtown Seattle does not degrade." The FEIS should describe these measures and the level of commitment to them. It should also describe the coordination process among the various transit agencies that provide service to the area. In addition, since this information was not included in the DEIS, FTA requests that any comments received on transit service during the construction period as presented in the FEIS be addressed in the ROD.

and Cover Tunnel and Elevated Structure Alternatives do not include replacing the seawall between Union and Broad Streets.

F-002-011

The Final EIS will include the Department of Ecology designation for each applicable water body. A general overview of applicable standards will also be included.

F-002-012

Subsequent to the Draft EIS, a Biological Assessment (BA) was prepared for the preferred Bored Tunnel Alternative. The effect determination for Chinook salmon is "may affect, likely to adversely affect"; the determination for bull trout is "may affect, not likely to adversely affect." The ESA consultation is now complete.

F-002-013

Construction haul routes and any associated impacts are identified in the Final EIS and Appendix C, Transportation Discipline Report.

Potential overwater construction staging areas are discussed in Appendix B, Alternatives Description and Construction Methods Discipline Report. The Final EIS Appendix N, Wildlife, Fish, and Vegetation Discipline Report, discusses the potential for some delivery and removal of construction materials by barge in the construction effects chapter.

F-002-014

The Final EIS and Appendix H, Social Discipline Report, address the temporary displacement of the Washington Street Boat Landing during construction as part of the Cut-and-Cover Tunnel and Elevated Structure Alternatives. The pergola facility would be restored and replaced in nearly the same footprint at the edge of the water after construction as it

is today. This effect is discussed in Chapter 6 in the Final EIS.

Seattle Parks and Recreation, which owns and maintains the in-water portion of the facility, removed the boat landing docks many years ago, and currently has no plans to change its use or function.

F-002-015

Additional maps have been provided in the Final EIS. Specifically, the following elements have been incorporated as suggested:

1. "Downtown" has been clarified as it relates to travel times.
2. We've clarified the year of analysis as 2030.
3. Maps showing planned detours have been provided as suggested.
4. Your comment to add a map showing traffic effects to other parallel streets is acknowledged; instead of adding a map, we revised the text to make it more clear.

Please note that the intersection improvements at S. Atlantic Street and S. Royal Brougham Way meant to improve access between SR 99 and SR 519 and the new ramps, railroad and ferry access mentioned on page 88 of the Draft EIS were covered under the SR 99 - S. Holgate Street to S. King Street Viaduct Replacement Project, which began construction in 2010.

F-002-016

The construction plans evaluated for noise and vibration are described in Appendix B, Alternatives Description and Construction Methods Discipline Report of the Final EIS. While actual construction plans and activity sequencing could differ from this evaluation, the locations and types of activities would be similar under the final sequence. The City of Seattle Department of Planning and Development typically grants temporary noise variances to construction projects with nighttime

work activities if there is no practical means to work within the City noise ordinance. The long duration and unique nature of the Alaskan Way Viaduct Project requires an extended temporary technical variance from the City in order to complete the project on time. Obtaining this type of technical variance involves a public hearing process that influences the final decisions and stipulations made by the City, which sets forth contextually sensitive noise mitigation measures to which the applicant is required to abide.

F-002-017

The Final EIS contains the information requested. The number of existing public parking spaces in the study area is presented in Chapter 4. The number of parking spaces permanently affected by the project is presented in Chapter 5 and the number of parking spaces temporarily affected during construction is presented in Chapter 6.

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking

- Provide short-term parking (off-street), especially serving waterfront piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide frequent parking updates
- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

F-002-018

Based on current project planning, Fire Station #5 would remain in place and would no longer be temporarily relocated during construction, as discussed in the 2004 Draft EIS.

F-002-019

The wording suggestion is appreciated. In the 2006 Supplemental Draft EIS, we used this suggested wording for a similar sentence in Question 10 of Chapter 5, which stated "no residential units would be acquired."

F-002-020

Staging areas have been identified and discussed in the Final EIS in Chapter 6.

F-002-021

The Surface Alternative was eliminated from further study, as described in the 2006 Supplemental Draft EIS.

F-002-022

The Waterfront Streetcar is not currently operating along Alaskan Way S. but could operate again in the future. The lead agencies will continue to coordinate with King County Metro, the operator of the Waterfront Streetcar, regarding future plans for the streetcar. Note that under the Bored Tunnel Alternative, the City of Seattle will lead planning of improvements along the central waterfront, including the Waterfront Streetcar.

The construction plans for the project have evolved since the publication of the 2004 Draft EIS. Please see Chapter 6 in the Final EIS for a summary of the construction plans for each alternative. Appendix B, Alternatives Description and Construction Methods Discipline Report, discusses construction in more detail.

See the Transportation Discipline Report, Appendix C, of the Final EIS for information about transit during construction.

F-002-023

The Final EIS describes transportation mitigation measures, including measures relating to the coordination of planning and implementation efforts by transit operators and other agencies as appropriate. Also refer to the Transportation Discipline Report, Appendix C of the Final EIS for a more detailed discussion of transportation mitigation measures.

The ROD will address any comments received on the Final EIS as appropriate.



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240



ER 04/272

JUL 3 0 2004

Mr. Daniel M. Mathis
Division Administrator
Federal Highway Administration
711 S. Capitol Way, Suite 501
Olympia, Washington 98501-1284

Dear Mr. Mathis:

The Department of the Interior has reviewed the Draft Environmental Impact Statement (DEIS) for **SR-99: Alaskan Way Viaduct and Seawall Replacement Project, Seattle, King County, Washington**, and offer the following comments. These comments have been prepared under the authority of and in accordance with the provisions of the Fish and Wildlife Coordination Act (48 Stat. 401 as amended, 16 U.S.C. *et seq.*), the Endangered Species Act, 1969 (ESA), as amended, and other authorities. They are consistent with the National Environmental Policy Act, 1969.

This review includes a more detailed review of Appendix R, the Fisheries, Wildlife and Habitat Discipline Report and Appendix S, the Water Resources Discipline Report. The proposed project alternatives were evaluated for potential impacts to fish and wildlife resources and their habitat, with specific attention to federally proposed, listed and endangered species under the Fish and Wildlife Service's (FWS) jurisdiction.

The DEIS presents six alternatives (including the No Build alternative), and no preferred alternative was identified. Draft conceptual mitigation options were provided in Attachment D of the Fisheries, Wildlife and Habitat Discipline Report; however, specific areas and amounts of mitigation that would be applied by alternative were not included in each alternative.

GENERAL COMMENTS

F-003-001

We are concerned with the uncertainty of operational impacts and potential mitigation related to this project. Many of the alternatives purport to have minimal to no impact on aquatic habitat. While habitat within the project vicinity has been substantially modified over the last 100 years, and the proposed project will not affect the currently modified conditions, it will maintain the modified conditions, which now only provide low functioning habitat for aquatic life.

F-003-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. After the 2004 Draft EIS was published, your comments along with others led to additional planning, analysis, and the revised alternatives presented in the 2006 Supplemental Draft EIS. Following publication of the 2006 Supplemental Draft EIS, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2004 Draft and 2006 Supplemental Draft EISs, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to identify the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront.

The Bored Tunnel Alternative would not replace the seawall; the replacement of the seawall would be done as part of a separate project lead by the City of Seattle. That project will identify restoration and mitigation options for effects to the shoreline habitat from the replacement of the seawall. The Bored Tunnel Alternative also would not

F-003-001 We generally agree with the conceptual mitigation options proposed in Attachment D (in the Fisheries, Wildlife and Habitat Discipline Report) with the exception of the use of stormwater runoff as a potential source of water for small streams. In addition to the increase in complexity in intertidal elevations, we suggest a vegetation component be incorporated into any mitigation design for Alternative D for the final EIS.

All the alternatives have similar environmental impacts and potential benefits with the exception of the Bypass Tunnel Alternative, which would result in a net loss of surface area and volume of shoreline habitat in Elliott Bay. The Aerial Alternative would result in the greatest gain in nearshore habitat, but according to the Water Resource Discipline Report, the implementation of stormwater best management practices would result in the lowest reduction of stormwater pollutants. The Rebuild Alternative would result in the greatest reduction of stormwater pollutants. Until more is known about the types of mitigation and how much of each type will be incorporated under each alternative, we cannot fully endorse any alternative.

SPECIFIC COMMENTS

F-003-002 Page 8 of the Fisheries, Wildlife and Habitat Discipline Report, Recommended Conservation Measures: please change the wording for "ESA requirements" to "ESA obligations" or "ESA responsibilities."

Page 19 of the Fisheries, Wildlife and Habitat Discipline Report: the use of the project area by the bull trout (*Salvelinus confluentus*) is documented as "rare." We expect that bull trout use of the area to be occasional or even common as opposed to rare. On November 26, 2003, Emily Teachout, a Service Biologist, provided the Washington State Department of Transportation, the FHWA, and the consultant with new information on the potential for bull trout to occur in the project vicinity. Additionally, in April 2004, the FWS released a technical guidance document for Puget Sound bull trout. This document is located at: <http://www.sharedsalmonstrategy.org/resources.htm#documents>) and provides the most up-to-date information on bull trout in the Puget Sound. We suggest the Washington State Department of Transportation and the FHWA review these materials, and update the discipline report and apply that toward the final EIS.

F-003-003 Page 64 of the Fisheries, Wildlife and Habitat Discipline Report: "because the project will meet U.S. Environmental Protection Agency (EPA)/Ecology standards for water quality, the survival of fish should not be reduced." The FWS is in the process of consulting under ESA, on the Ecology standards for water quality with EPA. Consequently, at this time, we cannot confirm whether the standards are protective enough for fish.

require any in-water work. The proposed stormwater treatment and water quality BMPs have been improved for all the build alternatives since the publication of the 2004 Draft EIS. Please see the Final EIS for current project analysis.

F-003-002

This discipline report has been revised significantly since 2004 to support the 2006 and 2010 Supplemental EISs and the Final EIS. The phrase "ESA requirements" is no longer used in the document. Likewise, the table that listed the bull trout use of the project area as "rare" is no longer in the document.

F-003-003

We recognize the concern that USFWS has regarding EPA/Ecology standards for water quality and the effects on fish. However, the proposed project will result in a net improvement in water quality discharged into Elliott Bay and Lake Union compared to existing conditions. Therefore, it is unlikely that fish mortality rates would increase compared to current conditions.

Mr. Daniel M. Mathis

-3-

Thank you for the opportunity to comment on this project at this early stage. If you have any questions or need clarification on fish and wildlife resources, please contact the U.S. Fish and Wildlife Service, Jennifer Quan at (360) 753-6047 or Emily Teachout at (360) 753-9583.

Sincerely,


for Willie R. Taylor
Director, Office of Environmental Policy
and Compliance

cc:

✓ Washington State Department of Transportation
401 Second Avenue South, Suite 560
Seattle, Washington 98104

F-004-001

ALASKAN WAY VIADUCT AND SEAWALL REPLACEMENT PROJECT
COMMENT FORM

PDEIS Chapter No.	PDEIS Page No.	PDEIS Paragraph No.	Comment
The following items are for the "complete PDEIS Text, Review 2, Unformatted."			
1	1	2	Studies, my comment what studies are you referring to?
1	1	5	Shortly after the earthquake . . What earthquake?
2	5	3	The sudden appearance of AWV without any explanation of AWV means
2	22	2	Last sentence, last line, an English error - scratch the word "would"
2	23	1	Last sentence, English error - left out the word "to" between undertaken and restore
2	23	3	Last sentence, last two words, How do you define "overall watershed
2	24	1	Discussion of maintenance activities disrupting traffic, can't this be eliminated via proper design and if not why not
2	24	2	Discussion of a planned new treatment plant - planned by whom
2	26	2	discussion of groundwater flow - what effect will this have on the soils? Possible later environmental effects?
2	27	1	What does "BST" mean??????
2	27	3	"number of trucks traffic" - I think this may be a English error
2	31	2	This paragraph could use more detail - a discussion of possible impacts would be good
2	33	4	scratch the word "near"
2	34	2	"March 15 to July 15" timing windows are likely to be expanded to February to August
3	39	3	From this page for many that follow there are numerous unsupported statements, this need references!
3	43	2	"Over eight decades from the 1870's to the 1930's" 1870 to the 1930s is 7 decades, not 8
3	43	3	Discussion of building before "we" knew much - who is "we"?
3	44	1	Second thru 4th lines - incomplete sentence
3	48	2	Discussion of soil movement under the roadway - which roadway??
3	48	4	Fourth bullet - insert "is" between viaduct and not

F-004-001

FHWA, WSDOT, and the City of Seattle appreciate your comments. Please see the responses to your Supplemental Draft EIS comment letter (F-008) submitted on September 26, 2006, which includes the 2004 Draft EIS comments that were still pertinent at that time. The project has continued to evolve since 2006, as have its environmental documents. Please see the Final EIS for current project information.

**ALASKAN WAY VIADUCT AND SEAWALL REPLACEMENT PROJECT
COMMENT FORM**

PDEIS Chapter No.	PDEIS Page No.	PDEIS Paragraph No.	Comment
3	70	4	Fish occur along the entire waterfront, not just the portion between S. King St. and Myrtle Edwards Park!
3	70	4	Last line the the word "northup" seems to be out of place
3	70	5	Bayis - two words, not one
3	70	5	SASSI lists the Green/Duwamish stock as healthy, but that is based almost entirely on hatchery fish, I doubt that the wild portion of the run could be considered healthy
3	71	2	the seawall and Colman Dock area could have essential fish habitat - NO it DOES have EFH!!!
3	71	2	I suggest you do not minimize the effect of EFH1
3	71	4	How can something be "essentially" covered, this needs explanation
3	71	5	A couple of wordruntogether problems
3	71	6	First three words don't make sense
3	72	1	Two run together sentences - put a period between city and The
3	77	2	"reasonably predictable" - can you be reasonably pregnant? It is or it isn't predictable!!
3	77	3	The use of "reasonably predictable" again
3	78	4	Does the steam plant still operate?
3	78	4	Last sentence - what does "cleaned up considerably" mean?
5	110	3	Third line the word "could" should be replaced with the word "would"
5	111	4	"stormwater water" seem redundant
5	111	4	TP what does this stand for? Toilet Paper?
6	118	5	"not ferry access" the sentence does not make sense
6	118	7	Incomplete sentence
11	276	5	I must have been tired since many pages have gone by since my last comment. Indirect effects can include more urban housing and it is probably that more condos will be built if the tunnel option materializes. Also more use of the waterfront and ???
11	279	2	Fix the first sentence

**ALASKAN WAY VIADUCT AND SEAWALL REPLACEMENT PROJECT
COMMENT FORM**

PDEIS Chapter No.	PDEIS Page No.	PDEIS Paragraph No.	Comment
The following items are for "Appendix R, Fisheries, Wildlife, and Habitat discipline Report."			
1	3	3	There is discussion of the water volume changes, please change this to square foot impact, not cubic foot impact
1	4	2	Why the difference in the amount of fill into Elliott bay between the tunnel and the bypass tunnel
1	4	4	The last sentence of the paragraph mentions additional habitat as a result of the replacement seawall - this is a stretch and I would like to know what habitat will be available and for what species of aquatic organism(s).
1	6	1	Fourth line has "tunnel and tunnel" - what does this mean?
2	8	1	Anadromous Fish Run Data - what are (is) the source(s)?
2	8	5	Commercial managed species - needs a better definition since there may be differences between State and Federally managed species
3	14	4	Second sentence, third line - "Condition" should be plural
4	13	2 - 4	The Project area is defined; however, the action area will need to be defined for the ESA consultation
4	22	2	The later part of the paragraph has many words such as "few, moderate, many" etc - perhaps a small table with actual numbers by date
4	23	4	Second sentence - the M-S Act regulates 3 species of salmon, not all species. Please redo the first and second sentence in this paragraph
4	25	table 4-5	Add yelloweye rockfish (<i>Sebastes ruberrimus</i>) to the list
5	37	Exhibit 5-1	When calculating amount of habitat please, do it in square measure not cubic
5	40	2	How does the WSDOT stormwater manual compare with the latest Ecology stormwater manual for the relevant actions?
5	41	3	What is the foot print, never mind the cubic measure!
5	42	3	How much over water coverage is associated with the sidewalk?
5	42 - 44, 46, 47		Confusing use of cubic yards and square footage - as far as habitat is concerned please use only square footage
5	43, 46	5, 2	Again, how much over water coverage is associated with sidewalks

**ALASKAN WAY VIADUCT AND SEAWALL REPLACEMENT PROJECT
COMMENT FORM**

PDEIS Chapter No.	PDEIS Page No.	PDEIS Paragraph No.	Comment
10	61	3	Section 7 of the Act also requires federal agencies to "utilize their authorities in furtherance of the purposes of this Act by carrying out programs for the conservation of endangered species and threatened species listed pursuant to section 4 of this Act."
10	61	3	Further, conservation is defined as . . . "the use of all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to this Act are no longer necessary."
10	65	4	I am confused - what does spawning have to do with juveniles?
10	66	4	This paragraph is incorrect - EFH does not have the 4 levels of impact that the ESA does. In EFH the impact is yes or no, so is should read "the proposed project will impact identified EFH"
The following items are for "Appendix S, Water Resources Discipline Report."			
1	4	Exhibit 1-2	Cu under Puget Sound - this is confusing, the numbers need a far better explanation!!!!!!
4	37	2	The conclusion about stormwater treatment in this paragraph appears to contradict the numbers in Exhibit 1-2
4	40	3	The second half of this paragraph - is this the reason for the confusion in Exhibit 1-2?
4	62	5	Again - comparison of WSDOT stormwater guidelines with Ecology stormwater manual
5	66	Exhibit 5-1	Zn and Cu under Puget Sound - why are the convey and treat numbers higher than the BMP numbers?

From: Carroll, Peter LCDR
To: AWV SDEIS Comments;
CC:
Subject: Coast Guard Comments - AWV SDEIS Comments
Date: Tuesday, September 26, 2006 10:13:03 AM
Attachments:

Hello, sorry for the late response, hopefully not too late to incorporate?

Attached are a few comments on the DEIS dtd July 2006.

- F-005-001** | 1) It's apparent that access for autos, bikes, and peds will not exist during the 7 - 9.5 year construction period for Alaskan Way. How would commuters (auto & bicycle access our main gate (Mass. Ave) from North and South-bound during construction
- F-005-002** | 2) Under this EIS, Will Coast Guard's Building's 1 and 5 be affected under either proposed alternative? (Buildings on our property that abut Alaskan Way and are on either side of S Atlantic Street). The Plans in the EIS seem to indicate a surface road for the Port cuts directly through Building 5 footprint, and partially through Building 1's footprint. . . and page 64 states the Coast Guard Museum (Building 5) would need to be relocated...however, recent discussions with the Project Engineers seem to indicate neither Building 1 or Building 5 are affected.
- 3) What affect, if any would either proposed alternative have on Building's 1 and 5 DURING construction?
- F-005-003** | 4) If Building 1 and 5 are not demolished, is there any sort of noise mitigation planned for the southbound down-ramp that will be in very close proximity to our building 1 windows?
- F-005-004** | 5) Will our base's main electrical transformer be affected by the new surface street entering the Port's property (T-46)?

Thank you.
Regards,

LCDR Pete Carroll, PE
Facility Engineer Integrated Support Command Seattle
(206) 217-8452
(206) 217-8634 fax
(206) 793-2090 cell

F-005-001

The construction activity on Alaskan Way S. near S. Massachusetts Street is now part of the S. Holgate Street to S. King Street Viaduct Replacement project. Access will be maintained to the Coast Guard main gate during construction. Construction for this project began in 2010 and project details can be found on the Washington State Department of Transportation's website.

F-005-002

The Coast Guard office building and the Coast Guard Museum would not be displaced by the Alaskan Way Viaduct Replacement Project. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative. With this alternative, only a few partial property acquisitions are necessary and none of them involve Coast Guard property. Please see the Final EIS for current project information.

During construction, access to the Coast Guard property will be maintained. Travel on Alaskan Way would, however, be affected by an increase in congestion due to construction traffic and related activities. An increase in noise levels may also be expected at times during construction. Mitigation for congestion and noise is discussed in the Final EIS.

Also, please see the environmental assessment for the SR 99 - S. Holgate Street to S. King Street Viaduct Project, which began construction in summer 2010. That project will replace the southern mile of the viaduct with a new side-by-side roadway, and the Coast Guard buildings referenced in these comments fall within its study area.

F-005-003

Current design plans show that Alaskan Way would be an at-grade roadway directly in front of your buildings. Mitigation for construction noise is proposed for this project. Please see Chapter 8 of the Final EIS.

F-005-004

There are currently no plans that would affect the location of the transformer for US Coast Guard. Current design indicates only the feed to the transformer potentially would be relocated.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

September 22, 2006

Reply to
Attn Of: ETPA-088

Ref: 01-050-FHW

Stephen Boch
Major Project Oversight Manager
Federal Highway Administration
711 South Capitol Way, No 501
Olympia, WA 98501-1284

Kate Stenberg
AWV Environmental Manager
Washington Department of Transportation
999 Third Avenue, Suite 2424
Seattle WA 98104-4019

Grace Crunican
Director of Seattle Dept of Transportation
City of Seattle
P.O. Box 34996
Seattle WA 98124-4996

Dear Mr. Boch, Ms. Stenberg, and Ms. Crunican:

F-006-001

The U.S. Environmental Protection Agency (EPA) has reviewed the Supplemental Draft Environmental Impact Statement (DSEIS) for the proposed **SR 99: Alaskan Way Viaduct & Seawall Replacement Project**, dated July 28, 2006, in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

Based on our review and evaluation, we have assigned a rating of EC-2 (Environmental Concerns, Insufficient Information) to the supplemental DEIS. This rating, and a summary of our comments, will be published in the Federal Register. A copy of the rating system used in conducting our review is enclosed for your reference.

F-006-001

Thank you for reviewing the 2006 Supplemental Draft EIS and for rating it in accordance with your agency's regulatory authority. Thank you for acknowledging our efforts to provide a thorough environmental analysis and extensive public involvement opportunities.

F-006-001

We commend you on your efforts to provide a thorough examination of possible alternatives and environmental analyses, as well as to provide extensive public involvement opportunities. The supplemental DEIS presents revised alternatives and information about construction impacts that is useful and will support informed decision making for the project. We anticipate continued conversation about the decision for the future of the Alaskan Way Viaduct. The DEIS and supplemental DEIS will support that conversation by providing accurate and useful information to the public.

We have provided some brief comments (attached) on the supplemental DEIS. The main focus of our comments is on air quality and human health effects during construction, and the reviewability of the document. Although we believe a very good effort has been made to provide a complete and accurate analysis, there were several aspects of the document that, if altered, would make important information more accessible.

Thank you for the opportunity to provide comments on this project. If you would like to discuss this letter, please contact me at 206-553-1601.

Sincerely,

Christine Reichgott, Manager
NEPA Review Unit

Attachments

cc: Army Corps of Engineers, Regulatory Branch
Terry Swanson, WSDOE
Teresa Eturaspe, WDFW
Emily Teachout, USFWS
Bob Donnelly, NMFS

Attachment
U.S. Environmental Protection Agency
Supplemental DEIS Comments for
SR 99: Alaskan Way Viaduct and Seawall Replacement Project

F-006-002

Purpose and Need, Project Alternatives, and Screening Criteria

EPA has been participating in the project's Resource Agency Leadership Forum (RALF). This group and associated meetings provides EPA with the opportunity to identify and preliminarily resolve issues of concern prior to formal review of the DEIS and supplemental DEIS. For this project, we have discussed and preliminarily agreed with the project's revised purpose and need, range of alternatives, and screening criteria. We do not feel we need to comment on them further.

We did look at the document's ability to communicate these NEPA components for public review and understanding. As part of that review, we examined the document's discussion of alternatives considered but eliminated. We believe the document provides a good, objective discussion about the ongoing public discourse, the alternatives considered and eliminated, and the change from five action alternatives to two recombined action alternatives. As the lead agencies work toward the final EIS and Record of Decision, it will be important for all alternatives to be treated equally, for NEPA purposes, and for the lead agencies to continue to support a robust public discourse on the issues.

Project Effects and Mitigation

F-006-003

Commitment to develop an air quality construction mitigation plan

Science has shown that diesel exhaust contains particulates which pose a significant health risk as a carcinogen, and fine particles that can lodge deeply in the lungs causing lung damage and aggravating conditions such as asthma and bronchitis. Diesel exhaust also contains substantial NOx, VOC, CO2 and sulfate emissions that contribute to ozone formation, acid rain, regional haze, and global climate change. We believe this is an important human health issue, and when combined with a very long construction period, will present the opportunity for chronic exposure to people living, working, and/or moving through the construction project vicinity. Although a commitment to develop several construction mitigation plans are discussed in Chapter 7 Question 23, an air pollutant emission control plan is not one of those. This section and the document overall, appears to minimize the risk to human health and air quality in general from the emissions of construction equipment diesel exhaust, mentioned above, and the value of committing to effectively mitigate these impacts.

We believe air quality mitigation and a construction mitigation plan are issues that warrant more than being reserved as a "possibility" for consideration for the Record of Decision. Ideally, it would have been integrated into the supplemental DEIS. We believe a commitment to develop a plan and performance measures for addressing all these air

F-006-002

Thank you for your comment in support of the discussion of alternatives considered but eliminated in our 2006 Supplemental Draft EIS.

F-006-003

A Memorandum of Agreement (MOA) has been developed between WSDOT and the Puget Sound Clean Air Agency (PSCAA). The MOA will help eliminate, confine, or reduce construction-related emissions for WSDOT projects. This MOA will apply to the Alaskan Way Viaduct Replacement Project. We also plan to develop a fugitive dust plan for construction activities.

F-006-003

quality effects should be identified. Additionally, focused monitoring of particulates and other emissions should be seriously considered.

F-006-004

EIS Format, Document Organization and Ease of Review

There are many good aspects to this document, such as the conversational tone, very readable writing and useful graphics, pictures, and tables. However, there are a few things about the document that have made it very difficult to review. In our previous letter commenting on the DEIS, we expressed concern about aspects of that document that remain relevant for the present supplemental DEIS. These include:

- the EIS format,
- the balancing act between providing accessible information and providing sufficient detail for decision makers,
- the format for presenting and comparing alternatives and impacts, and
- summarization of important discipline report information in the DEIS.

The supplemental DEIS and associated appendices are organized to supplement the information in the DEIS and DEIS appendices. This results in four documents to review or check for information. Additionally, the format is different from that of most other EISs which makes review cumbersome and awkward for many reviewers. For example the chapters are comprised of numerous Q&A sections that are not listed in the Table of Contents. Although the index does help to offset this, it is quite short. It has been very difficult and time consuming to find important information for our review. We don't know if the information is missing or if we just can't find it. For example, we struggled to determine if seismic issues were discussed in the supplemental DEIS. The CDs were helpful but a search for a subject area required looking through two CDs and numerous electronic folders.

Since the intent of an EIS is to help the public, agencies with expertise and regulatory authority, and decision makers understand the tradeoffs among the alternatives, it must provide information for all those purposes. When summarizing the information, it must accurately capture the important points. Some summary statements in the main SDEIS continue to leave out valuable and important information found in the Discipline Reports (Appendices). The supplemental DEIS should contain concluding statements that briefly reflect important discipline report information and describe, if appropriate, how the environmental impact might differ under the proposed alternatives. We are concerned that incomplete summary statements do not convey the important points about an impact and will not provide a sufficient understanding of the tradeoffs for the public and for the decisions that will be made.

The SDEIS did not include a matrix that would provide a comparative overview for the alternatives. We recognize that a summary matrix of differences between alternatives should never be used as the primary source of information about each alternative, but we do feel it helps the reviewer organize and stay clear about each alternative and the tradeoffs associated with it.

F-006-004

We continue to work hard to make this document usable to many different readers, including regulatory reviewers. The Final EIS contains one set of appendices that lists all effects, mitigation, etc. in one place. This approach should help make review easier. We did provide several tools in the Supplemental Draft EISs to help reviews find information. In addition to a technical index and a traditional document index, we added a more detailed technical table of contents in the 2006 Supplemental Draft EIS (see page 132). The technical table of contents includes a listing of the question and answer sections for each chapter. We provided this expanded table of contents in response to your agency's request in your comments on the 2004 Draft EIS.

We have worked hard to ensure that important trade-offs between alternatives and important conclusions from the technical appendices have been adequately documented in the main body of the EIS. We think the information presented in the main body of the EIS does provide sufficient information for readers to develop an understanding of the key issues and trade-offs associated with the alternatives.

We acknowledge your agency's desire for us to add a summary matrix. We think the summary chapter of the Final EIS adequately summarizes key issues and differences between alternatives.

F-006-004

EPA supports the lead agencies' effort to create a format that provides accessible and understandable information about the important issues of the project. We recognize that this new format is a "work in progress" and encourage you to consider approaches such as the ones that we have suggested as you continue to work on improving the format's usefulness and usability. These are important issues for creating a document that is complete, accurate, and usable.

F-006-005

Suggestion for additional analysis

Continuous construction vs. daytime construction schedule.

A section discussing "*Is continuous construction needed?*" is presented on page 39, but no information is provided for readers to: 1) understand the environmental tradeoffs between continuous construction and a less than 24-hours-a-day project schedule, or 2) develop an opinion whether work should occur 24-hours-a-day/7 days a week or 12-hours-a-day/7 days a week, for example. Chapter 7 discusses an intention to develop several construction mitigation plans including a noise plan.

Although additional analysis of impacts would be needed, we believe it would be helpful to describe some alternative schedules and compare any differences in impacts with the continuous schedule that is assumed for all action alternatives. There are some significant impacts associated with the project that might be different in a different project construction schedule. For example, the document describes some of the loudest construction noise as a 110 dBA sound level 50 feet from pile driving and a 90 dBA sound level 50 feet from a jackhammer. A 110 dBA sound level is twice as loud as shouting and a 90 dBA is the level at which hearing loss occurs (a sound level of 55 dBA is typical for light traffic 50 feet away). Projected construction noise is very loud and raises the question how disruptive this might be at night. A noise mitigation plan would be useful but would not provide the same discussion as examining different construction schedule options. We recommend the document provide a short qualitative description about the differences in impacts if the construction were not continuous. We think this will assist the document to be more complete and useful.

F-006-005

It is possible that construction for all activities could occur up to 24 hours per day, 7 days per week, within permitting requirements, if necessary. However, it is likely that the proposed construction activities and shifts will vary depending on the location and type of construction activity. The current construction plans for each build alternative do not assume continuous construction, even though that option is possible to maintain schedule, for instance.

The project's construction plans describing construction activities and durations are summarized in Chapter 3 of the Final EIS and discussed in more detail in Appendix B, Alternatives Description and Construction Methods Discipline Report, of the Final EIS. Appendix F, Noise Discipline Report, presents noise-related construction effects. In addition, the project is coordinating closely with the City of Seattle through its noise variance permitting process to find ways to address the concerns of sensitive populations within and near the project corridor.



U.S. Department
of Transportation
**Federal Transit
Administration**

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Alaska, Idaho, Oregon,
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RECEIVED
SEP 26 2006

September 22, 2006

Kate Stenberg
Alaska Way Viaduct Environmental Manager
Alaska Way Viaduct Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Stenberg:

Enclosed please find comments from the Federal Transit Administration (FTA) on the SR 99: Alaskan Way Viaduct and Seawall Replacement Project Supplemental Draft Environmental Impact Statement (Supplement). As you are aware, FTA is a federal cooperating agency for this National Environmental Policy Act (NEPA) analysis.

As everyone on your team is acutely aware, this project will create enormous challenges for our community, regardless of the alternative selected. We congratulate your team for the tremendous amount of good work done so far on this project.

We appreciate your consideration of the attached comments and look forward to continued collaboration on transportation projects in Washington. Please contact Linda Gehrke at 206.220.4463 if you have any questions.

Sincerely,

for
R.F. Krochalis
Regional Administrator

Enclosure

cc: Steve Boch, FHWA
Angela Freudenstein, WSF
Gary Kreidt, King County
Dorinda Costa, Seattle DOT
Karen Richter, PSRC

FTA COMMENTS
Alaskan Way Viaduct Project
Supplemental Draft Environmental Impact Statement (July 2006)
September 22, 2006

General Comments

F-007-001 | Selection of preferred alternative. The apparent reasons for selecting the Tunnel Alternative as the Preferred Alternative appear only at the very end of the document (p.118) at the end of the answer to a question on another topic. FTA recommends that the proponents' reasons be included in Chapter 2, where the Supplement describes the modified Tunnel Alternative and identifies it as the Preferred Alternative.

F-007-002 | Project costs. FTA found the discussion of project costs (pp. 19-20) too brief. A major topic in the public debate on this project has been the question of value: Is the added cost of a tunnel justified? Yet the crucial question, "How much will the project cost?" (p. 19) receives only a five-paragraph answer. There is no discussion explaining which of the Tunnel Alternative elements make that option 50 percent more expensive than the Elevated Structure, and there is no way to determine even roughly how expensive different "options" are (e.g., Lowered Aurora as opposed to Partially Lowered Aurora, or the Steinbrueck Park Lid). Cost estimates at this stage of project development are necessarily very gross, but that is not a reason to omit them. This shortchanges the members of the public and the decision makers interested in this question. We also did not find any discussion of the ongoing operating and maintenance costs of the alternatives. Even a qualitative comparison would be useful. We do, however, appreciate the updated cost estimates released on September 20.

F-007-003 | Travel demand forecasting. The explanation of the travel demand model used is not clear. This applies to the explanations in both the Supplemental DEIS (p. 39) and the technical appendix (2006 Appendix C, p. 11). FTA interprets the explanations to mean that the model used in the DEIS was revised for use in the Supplement's sections on forecasting construction impacts, but not elsewhere in the Supplement. FTA Region 10 is not aware of another DEIS that employed two different forecasting models to discuss short-term and long-term impacts. FTA recommends that the Final EIS include analyses based on only one model.

* *

Long-term impacts:

F-007-004 | SODO Ramp. The Stadium/SODO ramp area will be the focus of a great deal of traffic under both alternatives. The proposal calls for new ramps at S. Atlantic St. and S. Royal Brougham Way to connect the Duwamish Industrial Area, Harbor Island, SR 519, and I-90, as well as a new "loop ramp" to facilitate connections across SR99 from the Port of Seattle industrial area and the SIG.

F-007-001

The process that led to the identification of the preferred alternative is described in Chapter 2 of the Final EIS.

F-007-002

The discussion of costs in the 2006 Supplemental Draft EIS is consistent with FHWA, WSDOT, and City of Seattle NEPA and SEPA procedures. The discussion has been updated in the Final EIS to reflect the current alternatives. Costs are intentionally not a major part of these environmental documents so that people can focus on environmental impacts and benefits. The lead agencies have provided more detailed cost information to decision-makers and the public through avenues other than the environmental documents.

F-007-003

An updated travel demand model has been used for the traffic analysis in the Final EIS. Data from the updated model was used to analyze both short-term (construction) and long-term (operational) effects of the project.

F-007-004

Since 2006, the plans for this section of the project have evolved. The Bored Tunnel Alternative has been identified as the preferred alternative. With this alternative, full northbound and southbound access to and from SR 99 would be provided in the south portal area between S. Royal Brougham Way and S. King Street. The ferry holding area would not be moved to the location referred to in this comment. Please see the Final EIS for the current alternative configurations and proposed mitigation measures.

F-007-004

As a result, through this very complex set of structures will pass a high percentage of both freight and stadium/exhibition traffic, in addition to considerable vehicular and transit traffic. In addition, both plans propose to locate the ferry holding area in this same area, east of Alaskan Way near Railroad Way S or Royal Brougham Way.

The Tunnel Alternative puts still more vehicles on the streets with its King Street exit just a short distance from the SODO ramps. Under the Tunnel Alternative, all northbound SR 99 traffic that is bound for downtown Seattle, as well as all northbound traffic carrying hazardous or flammable materials, will exit at King Street.

If it is impossible to avoid concentrating so much activity in this area, FTA recommends that the FEIS look carefully at the need for significant mitigation. Under existing conditions, "Freight trips in the North Duwamish area, including port-related trips, must share the street system with other uses, including stadium event and ferry access traffic, both of which can overwhelm the street network at times, preempting other uses. Roads and rail lines intersect at many locations, and rail traffic preempts use of the roadway when train activity is present. Since trains are assembled at rail switching yards in the area, some of the train activity is switching movements that can block intersections for an extended time." 2004 DEIS Appendix C, p. 86.

F-007-005

Impact of SR 519. The SR 519 Project, already underway in the same geographic location, seeks to address some of the same goals as the SODO Ramps. That project's Phase 2 Alternative Feasibility Assessment (April 2006) presents a concept for "a direct east-west grade-separated connection (South Atlantic St. – South Massachusetts St.) from I-90 to Alaskan Way, SR 99, and waterfront (T-46)." How would this affect the SODO Ramp proposal in the Supplement, if at all?

F-007-006

Travel times from King Street ramps. The Supplement notes that under the Tunnel Alternative, transit access to downtown from northbound SR 99 would be via the new ramps to Alaskan Way near S. King Street (p. 53). It then notes that "this would extend transit service coverage to a larger portion of the downtown area – particularly the Pioneer Square area. Bus travel times to most areas would remain similar to existing conditions, depending on the rider's final destination." Are these statements accurate? FTA is not aware of a shortage of transit service in Pioneer Square. Moreover, it seems unlikely that travel times would be unaffected if northbound buses have to use the King Street ramp to Alaskan Way and then proceed via Washington or Main Street to First Avenue. The King Street ramp is also used to approach the stadium/exhibition center vicinity and is especially likely to be congested during events. FTA recommends that the FEIS assess the likely delay to transit making the movements between SR 99 and the downtown street system.

F-007-007

Impact to streetcar network. The Supplement notes that a single-track streetcar on Alaskan Way would not provide the same opportunities to expand the streetcar system as a two-track system (pp. 22, 53). It should mention that the City already has a plan to connect the Waterfront Streetcar to a S. Jackson Extension. (see, e.g., Executive Summary, South Jackson Streetcar Extension, 2005 Seattle Streetcar Network: South Jackson St. Corridor Report, SDOT (2005)). Also, both alternatives will replace King County's Alaskan Way

F-007-005

Coordination with the SR 519 project has been a key component of the Alaskan Way Viaduct Replacement Project, particularly in the context of the overall planning and roadway design process within the stadium area. The SR 519 project is now completed. The project team worked with the SR 519 project to ensure that designs and project development activities were coordinated and consistent. Please note that the SR 99 - S. Holgate Street to S. King Street Viaduct Replacement Project is currently in construction and will include new or rebuilt connections at S. Atlantic Street and S. Royal Brougham Way to improve mobility in the south downtown area.

F-007-006

These statements referenced in your letter are correct. Buses that currently access the Seattle Central Business District via the Seneca/Columbia Street ramps (predominantly originating in West Seattle/Burien) do not serve the southern portion of downtown Seattle, which includes Pioneer Square.

The Bored Tunnel Alternative has been identified as the preferred alternative. Under this alternative, the Columbia/Seneca Street ramps would be removed, and all transit currently operating on SR 99 would need to exit and enter SR 99 in the stadium area. This change in service coverage would increase the number of buses traveling through south downtown Seattle. The change would increase transit travel times to destinations in central downtown. Some of these travel time effects will be mitigated by the provision of the northbound transit-only lane on SR 99 from S. Holgate Street to the off-ramp intersection. Please see the Final EIS and Appendix C, Transportation Discipline Report for current information on effects to transit for each alternative.

F-007-007

Construction of the Olympic Sculpture Park and the resulting

- F-007-007** | Streetcar. The project would need to provide a maintenance facility for the new streetcar (unless King County agrees to provide one).
- F-007-008** | Colman Dock access. Has Washington State Ferries validated the adequacy of the proposed vehicle and pedestrian access to Colman Dock, both during and after construction? Presumably the percentage of walk-on passengers will increase during construction as people avoid unnecessary driving in downtown Seattle. Has that been factored in to the access plans?
- F-007-009** | Colman Dock traffic counts. As the Supplement notes, it used considerably lower traffic estimates for vehicles entering Colman Dock than the DEIS used. The DEIS explained that its use of the higher figures reflected “very busy conditions, to allow identification of traffic operating conditions during peak levels of ferry demand.” 2004 Appendix C, p. 102. Many people familiar with the ferries would argue that those very busy conditions are not uncommon, and the ferry system overall projects an increase of 60 percent by 2020 (WSF, “An Introduction to the Largest Ferry System in the Nation,” May 2003). Please explain the decision to change your modeling baseline from “very busy conditions” (1000 vehicles/hour) to a number almost 50 percent smaller (540 vehicles/hour). FTA recommends that any forecasting rely on numbers that are consistent with (a) WSF’s long-range plan for growth at this facility, and (b) projections made by the Puget Sound Regional Council.
- F-007-010** | Impact of train yard alterations. Does the traffic modeling include the planned relocation of the mainline passenger tracks into King Street Station to accommodate significant projected increases in passenger rail trains? The forecasting should assume the maximum possible number of daily Sound Transit Sounder trips. FTA recommends that the project proponents use Sound Transit’s most recent Sounder forecasts, not Sound Move forecasts (2004 Appendix C, p. 42). And do the traffic models include Amtrak’s planned expansion of its maintenance facilities north and south of South Holgate St., between First and Second Avenues, reducing South Holgate’s ability to accommodate east-west traffic movements? (See SR 519 Phase 2 Alternative Feasibility Assessment (April 2006), p. E-1).
- F-007-011** | Impacts to pedestrians (waterfront area). The discussion of impacts to pedestrians in Chapter 5 is incomplete. The Supplement notes at page 54 that the west-side waterfront sidewalk in the Elevated Structure Alternative would be only 15 feet wide – narrower than described in the DEIS, and narrower than existing conditions. The impact of that is made clear in 2006 Appendix C.:
- In areas of high pedestrian use and activity such as the waterfront, a pedestrian space of 25 to 35 feet would generally be preferred to allow separation between those browsing street side activities and faster- paced walkers. With the narrower walkway proposed as part of the Elevated Structure Alternative, the limited area available would restrict pedestrian speed and freedom to maneuver beyond the existing conditions. A pedestrian’s ability to cross the pedestrian stream would be impaired, as would the ability to pass slower walkers. (Page 87)
- At transit stops, of course, the sidewalk congestion would be greater.

displacement of the vehicle storage and maintenance facility led to the indefinite suspension of the Waterfront Streetcar service in 2008. None of the build alternatives for this project includes a maintenance facility for the streetcar once operations recommence on Alaskan Way. To date, there has been no resolution on location of the maintenance facility, which is required to re-start service. Under the Bored Tunnel Alternative, the City of Seattle will undertake planning for the central waterfront area, including the Waterfront Streetcar. Both the Cut-and-Cover Tunnel and Elevated Structure Alternatives provide for its replacement but would still require a new maintenance facility.

F-007-008

The project team has coordinated with Washington State Ferries throughout the design process for all build alternatives. The Final EIS Appendix C, Transportation Discipline Report, discusses the effects of the preferred alternative, the Bored Tunnel, both during construction and in the built condition. Travel model results and traffic analysis tools were used to determine potential effects of vehicles entering and exiting Colman Dock. A key finding is that “in peak hours, overall LOS (level-of-service) at the Alaskan Way/Marion Street intersection and at the Alaskan Way/Yesler Way intersection is forecasted to perform well (LOS D or better) for the Bored Tunnel Alternative in the built condition.” However, it must be noted that as with existing ferry operations, there would be service disruptions at times, due to issues with vessels (weather or breakdowns), or seasonal demand spikes that would cause variations and disruptions in traffic along Alaskan Way in the vicinity of the Seattle Ferry Terminal.

If the Bored Tunnel Alternative is selected, the final configuration of Alaskan Way would be determined through the City of Seattle's Central Waterfront Project. That project would coordinate with Washington State Ferries regarding access to and from the terminal for pedestrians and vehicles accessing from Alaskan Way.

* *

Construction impacts

- F-007-012** | The project proponents have demonstrated their commitment to developing effective construction mitigation strategies. We look forward to seeing a more comprehensive plan put before the public prior to release of the FEIS. FTA is especially interested in the transit-related construction mitigation measures. We may be a source of funding or expertise for some of them. Please keep us informed as these potential measures are fleshed out.
- F-007-013** | Public review of detailed mitigation plan. Given the length of the construction period and the intensity of construction-related impacts, FTA would have preferred to see a detailed mitigation plan released concurrent with the Supplement. We understand that many mitigation measures are identified in the appendices in addition to those called out in the Supplement itself; that additional strategies are being devised even now; and that detailed plans will be included in the FEIS. FTA recommends that the Record of Decision (ROD) respond to comments on the mitigation measures presented in the FEIS. Please see below for additional comments related to the mitigation plan.
- F-007-014** | Costs of mitigation measures. Will the project proponents will pay for whatever mitigation measures are adopted? Or are the measures in the Supplement and the Appendix available for consideration but contingent upon funding? Similarly, it is not clear whether the cost of mitigation has been included in the project cost ranges found on page 20. If mitigation is included, what was the basis of the cost estimate? In a project with construction impacts of this magnitude, FTA recommends that the project proponents estimate the actual costs of providing enough mitigation to meet the project's goal of "maintaining reliable transit service" (p. 96), rather than applying a formula ("X percent of construction costs for mitigation," for instance).
- F-007-015** | Additional buses as mitigation. FTA recommends that the final Construction Transportation Management Plan include a procurement plan for purchasing buses, identifying the numbers, types, sizes, fuel sources, vendor, and needed-by dates (bearing in mind that multi-year lead times may be required). In addition, FTA notes that local transit agencies presently have a limited amount of extra maintenance capacity. Depending on the number of buses required as mitigation, additional maintenance facilities may be required and should be analyzed in the FEIS.
- F-007-016** | Prioritization of mitigation strategies. FTA recommends that the project proponents prioritize the mitigation measures included in the FEIS, at least those related to transit. The priorities might be different for different areas of the city, and for different phases of construction.
- F-007-017** | Relation of Mitigation Plan to strategies. "While the final Construction Transportation Management Plan will accompany the Final EIS, transportation management strategies will be added to the plan once they are deemed effective at mitigating a construction effect of building the project" (2006 Appendix C, p. 154). Does that mean that the Plan adopted with the EIS will not include any strategies? Or that strategies not adopted with the Plan

F-007-009

The decision to update the ferry modeling baseline and forecast numbers was based on information and comments received from Washington State Ferries (WSF).

Based on updated information, the 2006 Supplemental Draft EIS estimates that 540 vehicles arrive at Colman Dock during the existing PM peak hour under current conditions. This estimate is based on existing PM peak hour demand at Colman Dock for the 30th busiest day of the year, which corresponds to a 92nd percentile weekday and is of a magnitude that is consistent with traffic counts taken in the vicinity of Colman Dock. These factors have been discussed fully with WSF staff.

F-007-010

The location of the passenger tracks into King Street Station does not affect traffic modeling. The Sounder frequency assumptions included in the 2030 Baseline Model include 12 two-way trips between Everett and Tacoma and 8 one-way trips from Tacoma to Everett. The 2030 Baseline Model also includes reduced capacity on S. Holgate Street to reflect increased train activity. The transportation modeling has been updated to provide current information for the Final EIS. Please see the Transportation Discipline Report, Appendix C for the current assumptions used and updated analysis.

F-007-011

In the 2006 Supplemental Draft EIS, the Elevated Structure Alternative proposed improving pedestrian-related amenities on the west side of the corridor. Starting at S. Washington Street, in front of the S. Washington Street Boat Landing, a 25-foot-wide area would be devoted to a sidewalk, a bicycle path, and an unstructured open space. From Yesler Way north, an area comprised of these same uses would be 41 feet wide; between Union and Pine Streets, a public open space would be added to the sidewalk and bicycle path, resulting in a public waterfront

- F-007-017** | will not be formal mitigation measures? Please explain the relationship between the Plan and the strategies.
- F-007-018** | Remote parking for construction workers. We note that the potential mitigation measure of requiring transit and/or remote parking (possibly with shuttle buses) for construction workers (p. 33) would ameliorate adverse impacts to traffic and air quality as well as parking. Given these benefits, FTA strongly urges that any final construction mitigation plan include this measure.
- F-007-019** | Travel times. FTA recommends that the FEIS include some analysis of impacts to transit travel times, rather than only looking at intersection congestion levels.
- F-007-020** | Reduction in traffic through downtown. What is the basis for the conclusion that total traffic for north-south routes through central downtown Seattle are expected to decrease by an estimated 7 percent during viaduct closures and 4 percent during viaduct restrictions (p. 95)? Do the traffic forecasts in the Supplement take these decreases into account? Do they take into account other alternate routes/diversions identified in the Supplement (e.g., the First Avenue South Detour)?
- F-007-021** | Vanpools for ferry riders. Additional ferry-landing-based vanpools and ride-sharing have also been proposed as likely mitigation during construction; do the Colman Dock access plans take those activities into account? Are vanpool vehicles available? Where will the vans be stored?
- F-007-022** | Section 4(f). Several properties potentially subject to Section 4(f) of the Dept. of Transportation Act of 1966 were declared ineligible in language similar to this: **Conclusion regarding Section 4(f) use:** This resource is not protected by the provisions of Section 4(f) *because it is primarily designed for passive viewing* and as such is not considered a park or recreation resource." 2006 Appendix B, p. 37 (emphasis added). What is the basis for the statement that "resources primarily designed for passive viewing" may not be considered a park or recreation resource? FTA does not believe that is a reason to disqualify a resource from 4(f) consideration.
- F-007-023** | Staging areas. FTA recommends an improved description of the potential staging areas. Of special concern is the plan to use local street rights-of-way (2006 Appendix C, p. 47), given the stresses likely to exist on local streets near the project. Even where on-street staging does not affect traffic conditions, it could hinder accessibility to bus stops and thereby impact speed and reliability.
- F-007-024** | Construction haul routes. Construction haul routes need more definition in the FEIS. The removal of 2.6 million cubic yards under the Tunnel Alternative (and perhaps an additional 650,000 cy if the Lowered Aurora option is selected) will itself contribute noticeably to congestion. (See Supplement, p. 103). Disposal sites may become an issue and require the use of different routes if AWV construction overlaps with Sound Transit (University Link), SR 520, I-405 and I-5 work. FTA recommends that the FEIS explain why or why not barge and rail hauling are possible.

space--up to 115 feet wide--in which people could walk or ride bicycles.

However, the project has evolved since 2006, and the exact configuration and types of activities provided on the waterfront under the Bored Tunnel Alternative will be determined by the Central Waterfront Project being led by the City of Seattle, not the Alaskan Way Viaduct Replacement Project. Descriptions of the central waterfront area under the Cut-and-Cover Tunnel or Elevated Structure Alternatives are provided in Chapter 3 of this Final EIS.

F-007-012

The lead agencies are committed to investing in mitigation for transit operations in the areas impacted by construction activities. Many of these strategies can be found in the Transportation Discipline Report, Appendix C of the Final EIS.

The project also acknowledges the offer by the FTA for potential funding assistance for mitigation. Please see Chapter 8 of the Final EIS for proposed mitigation measures.

F-007-013

The various mitigation measures developed for this project have been distributed for public review and comment as planning and design progress. The result is the mitigation measures included with the Final EIS. The nature of these measures is that they will continue to evolve and adapt to changing demands through the construction process. The ROD will include responses to comments received on the Final EIS.

F-007-014

The proposed mitigation for this project includes measures that are under the authority of and funded by the lead agencies. However, there are many independent projects underway that will have the effect of

- F-007-025** | Downtown Seattle Transit Tunnel. Sound Transit Central Link service will gradually reach levels requiring displacement of all Metro bus service from the Downtown Seattle Transit Tunnel. Has that been taken into account when considering the effectiveness of dedicating downtown arterials to bus service (*i.e.*, there may not be as much room for additional buses as anticipated)?
- F-007-026** | I-5 as alternative route. The Supplement states that I-5 currently operates near its maximum capacity (p. 31). However, the Supplement also cites I-5 as an alternate route that drivers could use during construction (p. 28). Is I-5 a realistic alternate route?
- F-007-027** | Cumulative impacts, coordination with I-5 roadwork. The Supplement appropriately notes that WSDOT is developing a plan to improve portions of I-5 from Boeing Access Road north to Northgate (p. 112). Given that I-5 is currently near its capacity and in congested conditions several hours a day, and in light of the potential for devastating slowdowns during this work, FTA believes that the cumulative impacts discussion should be more meaningful than "WSDOT will coordinate construction schedules for the AWV and I-5 projects to avoid and minimize any potential cumulative effects." FTA recommends that the FEIS include a description of how WSDOT will plan, sequence and monitor the cumulative construction impacts of the major upcoming transportation projects (I-5, SR 520, I-405, Colman Dock, Central and North Link), and how it and the City will manage a responsive mitigation program to address them.
- F-007-028** | Impacts of S. Spokane St. project. Does the analysis of transportation and parking impacts, both during construction and after, reflect (even qualitatively) the likely impacts of the South Spokane Street Viaduct Widening Project, which will restrict or eliminate westbound access on S. Spokane St., eliminate the parking below the viaduct for a considerable amount of time, and build new on- and off-ramps at First Ave. South? FTA recognizes that the Spokane Street project is not yet funded, but would its impacts exacerbate those of the AWV project if it were to proceed? Would not its completion before major construction on the viaduct begins provide important mitigation?
- F-007-029** | Bicycle - vehicle conflicts. The Supplement states that bicycles will be routed to other city streets from Alaskan Way during the construction period (p. 30). Do the project proponents have data on how many cyclists use Alaskan Way? How many already use the alternate routes? (On one random morning, 1737 cyclists were biking to or from the Central Business District during the morning commute. *See* <http://seattle.gov/transportation/bikeinfo.htm>). Given the likelihood of increased vehicular traffic and increased transit competing for limited street capacity, will the alternate routes have barriers to prevent conflicts with vehicles? Also, it would be helpful to see graphics showing bike and pedestrian routes throughout the project area for the construction period and for the finished project. This should include the SODO Ramp/SR 519 area, the Waterfront Trail and access to Colman Dock.
- F-007-030** | Impact to transit serving cruise ship passengers. The Port of Seattle will receive some 735,000 cruise ship passengers this year alone through Piers 66 and 30. The number of visitors is likely to increase steadily, especially with the stimulus of the 2010 Olympics in

mitigating potential impacts but are not contingent on or funded by this project. Examples include lane re-striping on I-5 as part of pavement rehabilitation that will improve traffic operations and the bus rapid transit routes included in transit improvements recently approved by county voters. These are clearly separate projects, but they will help relieve congestion by moving more traffic.

Project costs provided to the public have consistently included estimates of mitigation costs. These estimates have been refined as planning progresses. The basis for the estimates varies for each measure depending on the level of development. Percentages of construction costs based on formulas have not been used for these estimates.

F-007-015

FHWA, WSDOT, and the City of Seattle are involved in discussions with the regional transit operators regarding the coordination of transit mitigation efforts for regional "megaprojects" (e.g., SR 520 Bridge Replacement and HOV Program, I-5 Pavement Reconstruction and Bottleneck Improvement Projects). As these discussions progress, a plan for coordinating the various vehicle and maintenance facility needs for the increased intensity of transit service will be developed. While this process is separate from this project, reference is made to it in the Final EIS, Appendix C, Transportation Discipline Report.

F-007-016

Mitigation measures for or involving transit are discussed in Chapter 8 of the Final EIS and in Appendix C, Transportation Discipline Report. These measures are not prioritized as suggested in this comment. The Record of Decision also will contain the mitigation commitments for the project.

- F-007-030** | Vancouver. Will the construction mitigation plan include provisions addressing the transportation needs of these visitors?
- F-007-031** | Independent projects. Identified as one possible construction mitigation strategy is "Improve S. Spokane St. Pavement Surface at Fourth Ave. S." 2006 Appendix C, p. 156. Since this project is independent of the AWV project, it should not be included in a list of mitigation measures, even though it may help soften the impacts of the AWV project. The same is true of the S. Spokane St. Viaduct Ramp to Fourth Ave. S (p. 157) and the Lander St. Overpass Project (p. 158). FTA urges that each of them be completed in advance of major construction on the AWV project, if at all possible, but they should not be considered mitigation unless the project proponents intend to include them as mitigation in the AWV project.
- F-007-032** | Updated list of bus routes. We were unable to locate an updated list of bus routes that use the SR 99 Corridor. This list should include not only buses on SR 99 itself, but the other routes that will be affected by the project (for example, routes that use First Avenue South).
- F-007-033** | Format. Finally, FTA found the format difficult to work with. The Supplemental Draft Environmental Impact Statement (Supplement) frequently refers back to findings or data or conclusions from the DEIS, and both documents frequently present information in a "reader-friendly" but conclusory manner, requiring the reviewer to turn to the technical appendices for understanding. A careful reviewer therefore realistically needs to work with two oversize documents and two computers on which to look up both sets of technical appendices. Moreover, the amount of material to review is simply excessive: The Supplement's Transportation technical appendix by itself constitutes some 190 pages that augment rather than supplant the 322 pages of the DEIS Transportation technical appendix. While the other 24 appendices are shorter, most members of the public will likely find such a vast sea of material more overwhelming than useful. The inclusion of the CD-ROMS with the Supplement was helpful. We understand that agencies, decision makers, and the public clamor simultaneously for more information on specific topics but less information overall, but feel compelled to comment.

F-007-017

The lead agencies commit to mitigation measures within the Final EIS and, later, in Record of Decision. One of the commitments is to prepare a transportation management plan, which is not included with the Final EIS as it will be prepared after the environmental review process is complete. See Chapter 8 of the Final for a list of measures and strategies that would be included in the transportation management plan. In some cases, the lead agencies may have a suite of mitigation measures to choose from. In those cases, the lead agencies will select those mitigation measures that are commensurate with the impacts.

F-007-018

A number of locations for remote construction worker parking have been proposed for consideration, though final locations will be determined by the contractor.

F-007-019

Appendix C, Transportation Discipline Report, of the Final EIS contains the full analysis of impacts to transit speeds and travel times. These are summarized in Chapter 5 of the Final EIS.

F-007-020

Travel behaviors are extremely complex and varied in nature, and predicting how they will change during construction is difficult and involves some degree of uncertainty. A number of factors help to explain how and why traffic volumes would decrease overall when the viaduct is closed for construction. The primary driver of this reduction is that capacity on alternate routes has a finite limit. That is, every vehicle trip cannot be accommodated on an alternate roadway during peak travel periods.

Limited capacity on alternate routes can lead to some significant and

complex changes in travel behavior. This was reflected in the travel demand model as some auto trips changed modes (transit, carpools and vanpools), some people traveled at less congested times of the day, some people chose different destinations (e.g., driving to Southcenter to shop instead of downtown Seattle), and some trips just weren't made.

The travel demand model reflected these changes in travel behavior during construction, and as a result reflected that the increases in traffic on parallel routes will be slightly less than the amount displaced from SR 99. The model did take into account other alternate routes identified in the 2006 Supplemental Draft EIS.

Please note that the traffic information for the project has been updated since 2006. See the Final EIS and Appendix C, Transportation Discipline Report.

F-007-021

WSDOT, King County, and the City of Seattle have developed Transportation Improvements to Minimize Traffic Effects During Construction to keep people and goods moving during construction of the Moving Forward projects. These enhancements and improvements are independent projects that will benefit all pending Program elements. They are designed to increase transit options, shift traffic away from construction areas, and provide drivers with the information they need to choose less congested routes. These plans include information about travel alternatives and incentives to encourage use of transit, carpool, and vanpool programs. In addition to the Transportation Improvements to Minimize Traffic Effects During Construction and the transit-related projects, more localized mitigation measures will be developed as construction details are refined.

F-007-022

The Section 4(f) evaluation has been revised substantially since 2006,

both to follow current regulations and to address the current project. Please refer to the Final EIS Section 4(f) chapter.

F-007-023

An updated description of staging areas is contained in the Final EIS and Appendix B, Alternatives Description and Construction Methods. The lead agencies have coordinated with local and regional transit agencies to ensure that potential effects from using street rights-of-way for construction staging are minimized through construction scheduling, rerouting transit, informing the public of transit disruptions, and providing alternative routes.

F-007-024

Potential construction truck haul routes are presented in Chapter 3 of Appendix B, Alternatives Description and Construction Methods Discipline Report, of the Final EIS. However, rail and barge hauling are mentioned as possible alternatives to trucking.

F-007-025

As part of the traffic modeling effort, transit operations were considered for all transit routes that use the Downtown Seattle Transit Tunnel (DSTT). All routes that used the DSTT prior to the closure in 2005 were assumed to return September 2007 when the tunnel was reopened.

In 2009, when Sound Transit's Link Light Rail began operating between downtown Seattle and Sea-Tac Airport, some bus routes remained in the tunnel while others were rerouted to surface streets (Second Avenue, Third Avenue, Fourth Avenue, and Fifth Avenue). The remaining bus routes using the DSTT will not be rerouted to the surface until Link headways become too short to allow for mixed operations, which will occur over many years--well beyond the construction period of the

Alaskan Way Viaduct Replacement Project. Long-term bus operations on downtown city streets are outside the scope of this project.

F-007-026

Even though I-5 is near capacity, some drivers are expected to shift to use I-5 during construction because the number and capacity of alternative routes is limited in this section of Seattle. More trips will likely use I-5 just before or after the peak period, thereby extending the hours of congestion (per day) on this facility. Due to the current congestion and anticipated growth in demand in the corridor, I-5 is not expected to be able to handle a majority of SR 99 trips during construction, especially during the peak hours. Therefore, other alternate routes, mainly downtown north-south arterials, are expected to be used as alternate routes, though they will not be able to absorb the balance of traffic being diverted off of SR 99 during periods of major construction. Expanded transit service, demand management strategies, and some trip elimination will be needed to mitigate those trips that cannot be accommodated by city streets and I-5.

However, if the Bored Tunnel Alternative is selected, the viaduct would remain open to traffic during its construction period. SR 99 would be closed for only a few weeks to connect the new bored tunnel ramps to the surface SR 99.

F-007-027

WSDOT and the City of Seattle communicate regularly regarding construction staging and coordination for transportation projects occurring in the downtown Seattle area. WSDOT, King County, and the City of Seattle have developed and are implementing transportation improvement projects to minimize traffic effects to keep people and goods moving in and through Seattle. See Chapter 8, Mitigation, of the Final EIS for more information about how concurrent construction effects will be mitigated.

F-007-028

The majority of work for the S. Spokane Street Project, including the Fourth Avenue S. ramp and new eastbound and westbound ramps from the Spokane Street Viaduct, is scheduled to be complete by the Fall of 2011, prior to the start of major Alaskan Way Viaduct Replacement Project construction. The schedule of the S. Spokane Street Viaduct project does overlap with the S. Holgate Street to S. King Street Viaduct Replacement Project, and impacts are discussed in Chapter 7 and the cumulative effects appendix of the Final EIS.

F-007-029

A map showing pedestrian and bicycle facilities is included in the Final EIS. This map includes existing pedestrian and bicycle facilities. Bicycle access will be maintained during construction activities. Strategies to maintain pedestrian/ bicycle access during construction are described in Chapter 8 of the Final EIS. At times, it will be necessary to reroute bicycles using temporary facilities/detours, but these detours will be designed to minimize any inconvenience. Chapter 5 of the Final EIS describes the proposed permanent bicycle facilities for each alternative.

Barriers to prevent conflicts with vehicles are not proposed for temporary bicycle facilities/detours. Typically, bicycles operating on arterial streets in Seattle share the space with other vehicles (i.e., buses, autos) and can operate on sidewalks. Where right-of-way is adequate, bicycle lanes can be provided.

F-007-030

The Port of Seattle moved the T-30 cruise terminal to T-91 in Interbay in 2008, thereby reducing the number of cruise passengers and associated traffic along the waterfront. The project has met with waterfront tenants and owners. The intent is for mitigation strategies to be in effect as soon as access to the waterfront is disrupted by the project. Access to the

cruise terminal at Pier 66 for passengers and deliveries would be maintained during construction.

F-007-031

The City of Seattle's S. Spokane Street Project is under construction, and a new ramp connecting eastbound S. Spokane Street traffic to Fourth Avenue S. opened in August 2010. This will help divert some in-bound traffic off of First Avenue S. New westbound on- and off-ramps from First Avenue S. to S. Spokane Street are expected to open in Fall 2011. Widening of the S. Spokane Street Viaduct from East Marginal Way to Sixth Avenue S. is expected to be completed around May 2012. The Lander Street Overpass project has been placed on hold due to funding limitations. The future schedule of the project is unknown at this time, though the project remains a priority for SDOT. These projects are not considered mitigation for this project in the Final EIS.

Appendix C, Transportation Discipline Report, has been updated for the Final EIS. Please see that document for the current proposed mitigation measures.

F-007-032

An exhibit showing existing transit routes that use SR 99 is included in the Final EIS, Chapter 4. Project construction effects on transit routes is described in Chapter 6 of the Final EIS.

F-007-033

We acknowledge that there is a lot of information provided in the 2004 Draft and 2006 Supplemental Draft EIS documents. The thorough analysis conducted was completed in order to meet federal and state requirements. We are sorry to hear that the format of the document was not helpful to FTA. We continue to work hard to make the project's environmental documents useful to a wide variety of audiences. For the

Final EIS, each supporting appendix contains the current affected environmental, effects, and mitigation information for the proposed alternatives in one document.



UNITED STATES DEPARTMENT OF COMMERCE
 National Oceanic and Atmospheric Administration
 NATIONAL MARINE FISHERIES SERVICE
 Washington State Habitat Office
 510 Desmond Drive SE/Gulte 103
 LACEY, WASHINGTON 98503

September 26, 2006

RECEIVED

SEP 28 2006

Kate Stenberg
 Alaska Way Viaduct Environmental Manager
 Washington State Department of Transportation
 AWV Project Office (Wells Fargo Building)
 999 Third Avenue, Suite 2424
 Seattle, Washington 98104-4019

Dear Ms. Stenberg,

F-008-001

The National Marine Fisheries Service (NMFS) has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the State Route (SR) 99, Alaskan Way Viaduct and Seawall Replacement Project located in the City of Seattle, King County, Washington. NMFS appreciates the opportunity to review and comment on the SDEIS.

The FHWA, WSDOT, and the City propose to replace the existing Alaskan Way Viaduct (SR 99) and Alaskan Way Seawall (Seawall). Three alternatives are evaluated in the SDEIS: Tunnel, Elevated Structure, and the No Build. The Tunnel Alternative is the preferred alternative. In general, the Tunnel Alternative would construct SR 99 in a stacked six lane highway (three lanes in each direction). The Elevated Structure Alternative would rebuild SR 99 with a six lane highway. In both the Tunnel and Elevated Structure Alternatives, the seawall will be replaced. Although the seawall would not be replaced with the No Build Alternative, it would still need to be replaced due to its deteriorating condition.

NMFS commends the FHWA, WSDOT, and the City for a clear and well-written SDEIS. A thorough review of the different alternatives and the benefits, impacts, and effects of these alternatives was provided.

NMFS provided comments to the Federal Highway Administration (FHWA), Washington State Department of Transportation (WSDOT), and the City of Seattle (City) on the Draft Environmental Impact Statement (DEIS) in e-mails from Bob Donnelly to Allison Ray, WSDOT, on February 27, June 7, and August 17, 2004. The following comments from the DEIS are still pertinent to the SDEIS:

F-008-002

1. The DEIS or its appendices do not contain a discussion of the actions that would be taken if some or all of the existing seawall were to collapse during construction of the new seawall (just inland of the existing seawall). NMFS thinks there is a probability of some form of collapse during construction given the vibration associated with construction. Please provide additional information concerning how sediment (or contaminated sediment) will be contained or retrieved and how the piece(s) of the existing seawall will be recovered. In addition, please discuss what Best Management Practices (BMPs) will be implemented in the event that a



F-008-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments and value your participation in the project through the resource agency meetings.

F-008-002

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative for this project. This alternative has been analyzed in the 2010 Supplemental Draft EIS and Final EIS, and would not include the replacement of the seawall. Under this alternative, the replacement of the seawall would be a separate project led by the City of Seattle.

For the Cut-and-Cover Tunnel and the Elevated Structure Alternatives that do include the replacement of the seawall, maintaining the stability of the seawall during construction of the new wall sections is a key design consideration and performance measure. The design team has carefully incorporated the design elements, such as bracing or tiebacks, needed to ensure the stability of the structure during construction. In addition, an extensive settlement and vibration monitoring program would be developed to be conducted both during and after construction to measure indicators of movement and instability.

- F-008-002** | collapse occurred during the time of the year when juvenile Chinook salmon are present.
- F-008-003** | 2. The DEIS describes the use of grouting to stabilize the ground behind the existing seawall. NMFS thinks there is a high probability that some of that grout will find its way into the waters of Elliott Bay adjacent to the existing seawall. This is based on the last time grout was used in the same area to stabilize material behind the existing seawall. Please provide information about the BMPs that will be implemented in the event that grout got into Elliott Bay during the time of the year when juvenile Chinook salmon are present.
- F-008-004** | 3. There is mention of environmental mitigation associated with the project. However, the DEIS does not contain any details on mitigation and mentions this will be discussed at a later date. Please provide more detail on this subject so we may analyze the functions that could be obtained through mitigation actions.
- F-008-005** | 4. The subject of groundwater is given very little attention. Essentially it states that groundwater will find its own way into Elliott Bay. Please provide more detailed information on this subject. For example, where will the groundwater enter Elliott Bay? In addition, there was some discussion of using the groundwater in at least one of the mitigation proposals. How would this impact groundwater management?
- F-008-006** | 5. Page 48, No. 25: The DEIS states that the area adjacent to the seawall and between Pier 48 to Colman Dock could have areas of essential fish habitat (EFH). This area and all of Elliott Bay has been identified as EFH. Please describe all EFH areas and the project effects to EFH.
- F-008-007** | 6. Appendix R: Fisheries, Wildlife, and Habitat Discipline Report: Page 1, Chapter 1: Appendix R states that the Green/Duwamish Chinook salmon stock is currently listed as healthy based on escapement levels. This text was gathered from the 1992 Washington State Salmon and Steelhead Stock Inventory report. The Biological Review Team's Draft Status Review (2003) (available at <http://www.nwfsc.noaa.gov/trt/brt/brtrpt.cfm>) states that the Green/Duwamish Chinook salmon stock escapement levels consist of 70 percent, on average, hatchery strays. This indicates that the wild portion of the stock may not be considered healthy. Please update this information for subsequent documents.
- F-008-008** | 7. Appendix R: Fisheries, Wildlife, and Habitat Discipline Report: Page 8, Chapter 2: Please provide the source(s) for the data identified in the Anadromous Fish Run Data section.
- F-008-009** | 8. Appendix R: Fisheries, Wildlife, and Habitat Discipline Report: Page 23, Chapter 4: Section 4.1.3 states that the Magnuson-Stevens Act regulates salmon, groundfish, and pelagic fish. The Magnuson-Stevens Act regulates salmon, groundfish, and pelagic fish that fall under a Federal fisheries management plan.

F-008-003

Since publication of the 2006 Supplemental Draft EIS, a new containment strategy has been developed to prevent grout and other contaminants from entering the water in Elliott Bay. The containment method was developed in the September 2006 Tunnel Constructability workshop and includes the following procedures and applies to the Cut-and-Cover Tunnel and Elevated Structure Alternatives only:

1. The existing seawall would be surveyed for size and location of cracks and other potential leakage points.
2. Temporary repairs would be made to the existing seawall to retain upland grout when it is placed.
3. A turbidity curtain would be installed to minimize turbidity in the construction area and prevent water quality impacts outside the work area.
4. A movable containment panel would be installed adjacent to the existing seawall, including impervious mat to be placed over the riprap adjacent to the seawall. The size and location of the panel-mat system would be determined by the secant pile installation and grouting operations.

In certain areas, a sheet pile wall may be necessary for containment. A turbidity curtain would be installed prior to installation of the sheet pile wall or removal of riprap for placement of the sheet pile wall. The turbidity curtain will minimize or prevent turbid water from leaving the construction area and impacting water quality.

F-008-004

Information related to mitigation and proposed habitat enhancements was provided in the 2010 Supplemental Draft EIS and can be found in Chapter 8 of the Final EIS.

- F-008-009** | In Washington State, this includes various life-history stages of 46 species of groundfish, four species of coastal pelagics, and three species of Pacific salmon. Please update this section of the document.
- F-008-010** | 9. Appendix R: Fisheries, Wildlife, and Habitat Discipline Report: Page 25-26, Chapter 4: Please include the following groundfish to Exhibit 4-5: California skate (*Raja inornata*), rosethorn rockfish (*Sebastes helvomaculatus*), and sablefish (*Anoplopoma fimbria*). Essential fish habitat is also designated for three species of salmon: Chinook salmon, coho (*Oncorhynchus kisutch*), and Puget Sound pink salmon (*O. gorbuscha*). Please include these fish in the EFH analysis.
- F-008-011** | 10. Appendix R: Fisheries, Wildlife, and Habitat Discipline Report: Page 59, Chapter 9: Appendix R states that in-water construction along the Elliott Bay shoreline is likely to be prohibited from March 15 to July 15. The correct dates that in-water work will be prohibited in Elliott Bay are February 16 to July 15. In Lake Union, work would be prohibited from April 16 to September 30.
- F-008-012** | 11. Appendix R: Fisheries, Wildlife, and Habitat Discipline Report: Page 61, Chapter 10: Please update this section to read as follows: Section 7(a)(2) of the ESA requires Federal agencies to consult with the Services, as appropriate, to ensure that their actions are not likely to jeopardize the continued existence of endangered or threatened species or adversely modify or destroy their critical habitats. Furthermore, the DEIS should state: Section 7(a)(1) of the Act directs Federal agencies to utilize their authorities to further the purposes of the Act by carrying out conservation programs for the benefit of endangered and threatened species. Conservation is defined as the use of all methods and procedures which are necessary to bring any endangered or threatened species to the point at which the measures provided pursuant to the Act are no longer necessary.
- F-008-013** | 12. Appendix S: Water Resources Discipline Report: Page 4, Exhibit 1-2 and Page 39, Section 4.1. These two sections appear to contradict each other. Page 39 states that because the proposed project will treat stormwater the total amount of pollutant loading from the project area will be reduced relative to existing conditions. In Exhibit 1-2 zinc and copper loading stays the same or increases in Puget Sound and Lake Union. Please accurately describe which pollutant loading is being reduced. Please describe why the pollutant loading for zinc and copper actually goes up using the Convey and Treat Approach in Puget Sound.
- F-008-014** | NMFS reviewed the alternatives and sections of the SDEIS, including the appendices, that described effects on threatened and endangered species and their critical habitat. Specific concerns and issues that were reviewed include the replacement of the Seawall and associated habitat improvements, construction of the overwater structure between Pier 48 and Colman Dock, stormwater effects, and re-suspension of contaminants in the sediments. These aspects of the project will have the most significant impacts on listed species.

F-008-005

The existing Alaskan Way Viaduct Replacement Project area is part of a highly developed downtown urban corridor along the Elliott Bay waterfront. The project area has been developed for more than 100 years and is assumed to be 100 percent impervious. The specific location for discharge of groundwater to Elliott Bay is not known. Based on observations of groundwater seepage to Puget Sound in other locations, groundwater discharge likely occurs as diffuse seepage along the contact between the aquifer material (sand and gravel soils) and Elliott Bay.

Groundwater reinjection has been proposed to potentially mitigate the impacts of construction dewatering of excavations. Groundwater pumped from the construction dewatering system would be treated and then reinjected through wells into the soil outside the excavation. From a groundwater management perspective, the result of using groundwater for this purpose is a net reduction in the groundwater being removed from the underlying aquifers.

F-008-006

Descriptions of and potential effects to essential fish habitat are included in the biological assessment developed for the project. Species that have essential fish habitat in Elliott Bay are identified in Final EIS Appendix N, Fisheries, Wildlife, and Habitat Discipline Report and Chapter 4 of the Final EIS.

F-008-007

Thank you for the clarification. Subsequent documents incorporated this information, as appropriate.

F-008-008

Data were obtained from Weitkamp and Ruggerone (2000) and from the

F-008-014 NMFS understands that the SDEIS does not provide an in-depth analysis of potential impacts to threatened and endangered species. The FHWA and WSDOT will be consulting with NMFS under section 7 of the Endangered Species Act. A more thorough review of the impacts to threatened and endangered species will be required at that time.

The following are comments on the SDEIS:

- F-008-015** 1) Throughout the SDEIS (Page 25, No. 8; Page 33, No. 18; Page 104, No. 23; etc.) the SDEIS states that FHWA, WSDOT and the City will work with the regulatory agencies to improve any fish and wildlife habitat affected by the project, to evaluate conservation measures to avoid, minimize, rectify, or compensate for impacts to species and their habitat, and review mitigation plans. NMFS has been coordinating with the FHWA, WSDOT and the City throughout the project design to identify and minimize potential impacts to fish and wildlife. NMFS will continue to be available to provide technical assistance for the identification of any mitigation, restoration and enhancement projects to improve habitat for listed species. We look forward to a list of all project effects to listed fish and their critical habitat and conservation measures to avoid and minimize these effects in the biological assessment required for the Endangered Species Act section 7 consultation on the project.
- F-008-016** 2) Page 68, No. 15: The SDEIS states that a temporary 15,000-square-foot access bridge would be constructed instead of a permanent 33,000-square-foot overwater pier between Pier 48 and Colman Dock. It is unclear from the SDEIS how long the temporary access bridge would be in place (additional information on the access bridge was given on Pages 76 and 101). On Page 101, the SDEIS states that the bridge would be constructed within the first 30 months and would remain until construction is complete. A temporary bridge constructed and used for six to eight years could have significant impacts to the aquatic environment, even with a smaller surface area. Please analyze these effects on listed species and their critical habitat.
- F-008-017** 3) Page 68, yellow box in lower right corner: This box identifies new species and habitat that are evaluated in the SDEIS. Resident killer whales (*Orcinus orca*) are identified, but proposed critical habitat for the killer whales is not. Please analyze the effects of the project on proposed critical habitat for killer whales.
- F-008-018** 4) Page 69, No. 16: The SDEIS states that stormwater from any impervious surfaces that are replaced by the project will be treated before it's discharged. On page 70, the SDEIS states that stormwater runoff generated within the project area will be collected and either directed to the combined sewer system and sent to a treatment plant, or treated using best management practices (BMPs) consistent with applicable stormwater codes. NMFS is not clear on how the stormwater will be treated, what performance standards or specific BMPs will be employed and what are the contaminant removal efficiencies of these BMPs. This information will be needed to determine effects of water quality on listed species and their habitat.

WDFW Salmonid Stock Inventory website:

http://wdfw.wa.gov/webmaps/salmonscape/sasi/full_stock_rpts/1160.pdf.

F-008-009

Comment noted. Subsequent applicable reference to the Magnuson-Stevens Act incorporated this information, as appropriate.

F-008-010

Comment noted. A discussion of the effects of the project on EFH is provided in the biological assessment, as appropriate. The preferred Bored Tunnel Alternative would not replace the seawall or require in-water work that would disturb EFH.

F-008-011

Comment noted. The Elliott Bay work window included in Appendix R was for salmon, and it did not include the work window for bull trout. Work window discussions in the Final EIS include the salmon and bull trout work windows. However, no in-water construction activities are expected to occur in Lake Union as part of the project.

F-008-012

Comment noted. The appropriate text is included in Section 2.2 of Appendix N, Wildlife, Fish and Vegetation Discipline Report, of the Final EIS. Detailed discussion of the project effects on ESA species is provided in the biological assessment for the project.

F-008-013

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This approach is described in the Final EIS Appendix O, Surface Water

- F-008-019** | 5) Page 76, No. 6, Building the Colman Dock Ferry Terminal Access Road: The SDEIS states that the temporary over-water bridge to provide vehicle access to the ferry terminal would be constructed by placing steel or precast concrete piles. NMFS recommends that concrete piles be used over steel piles to minimize pile driving impacts to listed species.
- F-008-020** | 6) Page 77, Step 2 and Page 79, Step 2: The SDEIS states that crews may remove riprap adjacent to the seawall. It further states that once the riprap is removed, a sheet pile wall, silt curtain, or equivalent protective measure would be installed. NMFS recommends that a silt curtain be placed in-water prior to the removal of the riprap. Removal of the riprap can create significant turbidity and result in impacts to aquatic species.
- F-008-021** | 7) Page 101, No.19: The SDEIS states that project partners are considering the feasibility of constructing temporary over-water pedestrian walkways between some piers. No further information or analysis on the effect of these walkways on listed species or the habitat was provided. Additional information on their location, type of construction material used, how long they will be used, etc. is needed to determine effects of the walkways on listed species.
- F-008-022** | 8) Page 102, No. 19: The document states that a temporary sheet pile wall, silt curtain, or equivalent measure would be installed to protect water quality in Elliott Bay. The document further states that in the DEIS the use of a silt curtain was proposed, but a temporary sheet pile wall was not included. It is the understanding of NMFS from meetings held with the action agencies that it may not be possible to install a sheet pile wall because of the existing riprap and other material placed along the Seawall. The SDEIS should accurately describe how water quality in Elliott Bay will be protected because the installation of a sheet pile wall with an impact pile driver, if needed, may have adverse affects to listed fish species.
- F-008-023** | 9) Page 102, No. 20: The second paragraph states that temporary turbidity impacts could result from disturbing the bottom sediments, which could be contaminated, during installation of the sheet pile wall. We could not find a description of these contaminants or their effects on aquatic species. Please provide this information.
- F-008-024** | 10) Page 102, No. 20: This section identifies the need to disturb and rebuild portions of the City's and King County's existing combined sewer and separated storm drainage systems within the project area. No analysis on the effects from combined sewer outfall discharges was provided in the SDEIS based on the project. Please analyze these effects on listed species and their habitat.

Discipline Report, and is most similar to the BMP Approach presented in the 2004 Draft EIS. An updated pollutant load analysis is also included in the Final EIS Appendix O.

Compared to existing conditions, all build alternatives would reduce the overall amount of pollutant-generating impervious surface, which is expected to improve water quality. Some portions of the project area currently discharge to Elliott Bay and Lake Union without treatment. All of the build alternatives would provide water quality treatment for pollutant-generating impervious surfaces in these areas.

F-008-014

The potential effects on federally-listed threatened and endangered species are discussed in the biological assessment for the project, the Final EIS, and Appendix N, Wildlife, Fish, and Vegetation Discipline Report.

F-008-015

The lead agencies appreciate the involvement of NMFS during the course of this project. A biological assessment has been prepared for this project and it discusses the current project effects to endangered species. Your biological opinion was received on January 27, 2010.

F-008-016

The temporary over-water structure that could be in place for up to 8 years with the Cut-and-Cover Tunnel or Elevated Structure Alternatives, could impact the aquatic environment, depending on the water depth and orientation of the structure. Assessment of potential effects associated with a temporary over-water structure is included in the Final EIS Appendix N, Wildlife, Fish, and Vegetation Discipline Report. The preferred Bored Tunnel Alternative does not require the temporary structure referred to in this comment.

- F-008-025** | 11) Page 103, No. 23, Fish, Aquatic Resources, and Water Quality: The SDEIS states that an Aquatic Resource Mitigation Plan will be developed to address construction-related effects to Elliott Bay habitat and water resources. The Aquatic Resource Mitigation Plan should also address construction-related effects to Lake Union.
- F-008-026** | 12) Appendix R; Fisheries, Wildlife, and Habitat Discipline Report: Page 2, 1.2 Proposed Project: The first paragraph states that Appendix R focuses on the Seawall portion of the project along the edge of Elliott Bay because the only fish, wildlife, and vegetation resources that occur within the project area are those associated with Elliott Bay and its shoreline. As stated in Comment 13 below, there are potential effects to listed fish, designated critical habitat, and other aquatic resources in Lake Union during construction and operation and maintenance of SR-99. The SDEIS and Appendix R should identify and describe all impacts to listed species and their critical habitat in both Elliott Bay and Lake Union.
- 13) Appendix R; Fisheries, Wildlife, and Habitat Discipline Report: Page 7, 2.2 Existing Environment: Appendix R states that designated Chinook salmon critical habitat includes the nearshore areas of Elliott Bay. The SDEIS states that treated stormwater or dewatering water could be discharged to Lake Union using a temporary outfall or through existing outfalls. Lake Union and the Lake Washington Ship Canal are designated critical habitat for Chinook salmon. Please analyze the effects of the project on Chinook salmon and designated Chinook salmon critical habitat in both Elliot Bay and Lake Union.
- F-008-027** | 14) Appendix R; Fisheries, Wildlife, and Habitat Discipline Report: Page 23, 5.4 Benefits: Bullet #3 states that numerous creosote-treated piles would be removed along the face of the existing seawall. Further information is needed regarding these piles. The SDEIS discusses the removal of contaminated soil. If the soil has greater than 5 percent woody debris consisting of creosote-treated piles, the soil will be removed and transported to a landfill. Are these old creosote-treated piles that are no longer used and were just left in Elliot Bay, are they supporting piles that will be replaced, or wood used to construct the existing seawall that will be removed? Please describe these creosote-treated piles and evaluate the potential effects of the re-suspension of the creosote on listed fish and the prey species.
- F-008-028** | 15) Appendix R; Fisheries, Wildlife, and Habitat Discipline Report: Page 26, 6.2 Pile Driving: This section describes the potential effects of pile driving and sound pressure levels or sound exposure levels on fish. This section does not describe sound attenuation measures such as bubble curtains or Gunterbooms (fabric and bubble curtain combined) that can be used to reduce pile driving effects to fish. NMFS recommends that sound attenuation devices be used to minimize impacts to fish resulting from impact pile driving of piles.

F-008-017

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative. This alternative would not replace the seawall or require in-water work. For the Cut-and-Cover Tunnel Alternative and Elevated Structure Alternative, which would both include replacement of the seawall, project construction activities will occur in areas shallower than 20 feet, which is outside of the designated critical habitat for killer whales. In addition, killer whales are unlikely to occur in the nearshore areas along the Seattle waterfront, due to the extensive anthropogenic activities and the multiple piers and piles. While the primary mechanism of potential effects of project operations on critical habitat is through stormwater discharge, the project is expected to improve water quality conditions in Elliott Bay or Puget Sound, compared to existing conditions.

F-008-018

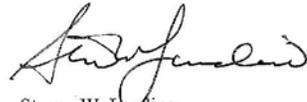
The Convey and Treat Approach and the associated treatment facility have not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS.

Specific BMPs will not be determined until later in the design and permitting process. BMPs will be designed to meet the Basic Treatment Requirements as defined in the WSDOT Highway Runoff Manual, which is equivalent to the Ecology Manual 2005, or the applicable stormwater manual at the time of permitting. Both the WSDOT and Ecology Manuals have several BMPs that meet the requirements of Basic Treatment.

An updated pollutant load analysis that summarizes total annual loading is included in Appendix O of the Final EIS. Potential toxicity of

Thank you again for the opportunity to review the SDEIS. If you have any questions or need clarification on any comment, please contact Jim Muck of NMFS at (206) 526-4740.

Sincerely,



Steven W. Laadino
Washington State Director
for Habitat Conservation

stormwater discharges is discussed in the Biological Assessment prepared for the preferred alternative.

F-008-019

No steel piles will be used for temporary bridge construction. Please note that constructing an access road to Colman Dock is not necessary for the preferred Bored Tunnel Alternative but would be required for the Cut-and-Cover Tunnel or Elevated Structure Alternatives.

F-008-020

In areas where it is necessary to remove riprap for construction, a turbidity curtain or equivalent protection will be installed prior to removing the riprap to minimize turbidity and impacts to aquatic species.

F-008-021

With the Cut-and-Cover Tunnel and Elevated Structure Alternatives, walkways are proposed to facilitate adequate pedestrian access to the waterfront businesses so they can continue to operate. The effects of these temporary overwater pedestrian walkways between the central waterfront piers are discussed in Chapter 6 of the Final EIS and in Appendix N (Wildlife, Fish, and Vegetation Discipline Report). The effects of the project on listed species are discussed in the biological assessment. The preferred Bored Tunnel Alternative does not include these walkways.

F-008-022

Since publication of the 2006 Supplemental Draft EIS, a new containment strategy has been developed to prevent grout and other contaminants from entering the water in Elliott Bay. The containment method was developed in the September 2006 Tunnel Constructibility workshop and includes the following procedures and applies to the Cut-and-Cover Tunnel and Elevated Structure Alternatives only:

1. The existing seawall would be surveyed for size and location of cracks and other potential leakage points.
2. Temporary repairs would be made to the existing seawall to retain upland grout when it is placed.
3. A turbidity curtain would be installed to minimize turbidity in the construction area and prevent water quality impacts outside the work area.
4. A movable containment panel would be installed adjacent to the existing seawall, including impervious mat to be placed over the riprap adjacent to the seawall. The size and location of the panel-mat system would be determined by the secant pile installation and grouting operations.

In certain areas, a sheet pile wall may be necessary for containment. A turbidity curtain would be installed prior to installation of the sheet pile wall or removal of riprap for placement of the sheet pile wall. The turbidity curtain will minimize or prevent turbid water from leaving the construction area and impacting water quality.

F-008-023

Additional sediment sampling was conducted along the Seattle waterfront to enhance the sediment contaminant characterization in the area. Sediment sampling information is provided in Appendix Q, Hazardous Materials Discipline Report, of the Final EIS. The potential effects of these compounds on aquatic biota in the project area are reviewed and discussed in the Final EIS and Appendix N, Wildlife, Fish, and Vegetation Discipline Report.

F-008-024

All project improvements with the build alternatives would be independent of the combined sewer and separated storm drainage

systems. By design this project will not modify current operation of these systems or constrain future improvements undertaken by the City of Seattle. Therefore there is no effect on the combined or separated sewer systems to evaluate. The Biological Assessment prepared for this project evaluated stormwater runoffs related to the project following accepted methodologies.

F-008-025

No Aquatic Resource Mitigation Plan will be prepared for the preferred Bored Tunnel Alternative, as there is no proposed in-water work. The Final EIS addresses potential impacts (temporary and permanent) and proposed avoidance, minimization, and mitigation measures relative to both Elliott Bay and Lake Union habitat. However, direct construction effects on Elliott Bay and Lake Union habitat are not expected, as no in-water or nearshore work would occur as part of the project. The primary potential effects of construction activities on Lake Union habitat would be from stormwater runoff from the construction area. However, it is assumed that construction BMPs will be adequately installed and appropriately monitored to minimize or eliminate any discharge of construction site runoff to Lake Union. Detailed descriptions of runoff BMPs are provided in the Surface Water Discipline Report, Appendix O of the Final EIS.

F-008-026

Since 2006, the project has evolved and the Bored Tunnel Alternative has been identified as the preferred alternative. As a result, the anticipated effects of the project on listed species and their critical habitat as discussed in the 2006 Supplemental Draft EIS have also changed. The project's biological assessment discusses the effects associated with the preferred alternative. Current anticipated project effects are also presented in Appendix N, Wildlife, Fish, and Vegetation Discipline Report, and summarized in Chapters 5 and 6 of the Final EIS.

F-008-027

The Bored Tunnel Alternative does not include the replacement of the existing seawall or any in-water construction activities, so none of the creosote piles and timbers would be removed as part of the preferred alternative.

There are a number of creosote piles and timbers in the project area that could be removed during construction of the Cut-and-Cover Tunnel or Elevated Structure Alternatives. The removal of a portion of the overwater structure at Pier 48, as prior mitigation for constructing the temporary overwater ferry access bridge, would result in the removal of piles from the nearshore habitat. In addition, there are a number of wooden piles that support the overhanging sidewalks along the waterfront. These would be removed and replaced with cantilever sidewalk support structures. With the Cut-and-Cover Tunnel and Elevated Structure Alternatives, the removal of the existing seawall face would also result in the removal of a number of support piles and associated timbers. The removal of such material is part of the mitigation for the project, leading to long-term beneficial effects on aquatic resources in the area. Potential in-water construction activities associated with the Cut-and-Cover Tunnel and Elevated Structure Alternatives are discussed in the Final EIS Appendix N, Wildlife, Fish, and Vegetation Discipline Report.

F-008-028

Sound attenuation measures would be used when driving piles in water with the Cut-and-Cover Tunnel or Elevated Structure Alternatives. However, current project design for the preferred Bored Tunnel Alternative does not call for any in-water pile driving. The description of mitigation measures, including BMPs, for the potential impacts of the project on the aquatic environment are included in the Final EIS Appendix N, Wildlife, Fish, and Vegetation Discipline Report. Mitigation for the project is also discussed in Chapter 8 of the Final EIS.

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Washington, DC 20240



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Ms. Kate Stenberg
Environmental Manager
Alaskan Way Viaduct and Seawall Replacement Project
Washington State Department of Transportation
999 Third Avenue South, Suite 2424
Seattle, Washington 98104-4019

Project No. U09936Z
Contract No. General
File Code PE0701
Log No. CR 00247

Dear Ms. Stenberg:

The U.S. Department of the Interior (Department) has reviewed the Supplemental Draft Environmental Impact Statement and Section 4(f) Evaluation for **SR-99: Alaskan Way Viaduct and Seawall Replacement Project, Seattle, King County, Washington**, and offers the following comments.

The proposed project would repair or replace the existing Alaskan Way Viaduct (AWV) and Alaskan Way Seawall (Seawall). Three alternatives are evaluated in the Supplemental Draft Environmental Impact Statement (SDEIS): Tunnel, Elevated Structure, and No Build. The Tunnel Alternative is the Preferred Alternative and would construct the SR 99 in a stacked six lane highway configuration (three lanes in each direction). The Elevated Structure Alternative would rebuild the SR 99 with a six lane highway. In both the Tunnel and Elevated Structure Alternatives, the Seawall would be replaced. The Seawall would not be replaced with the No Build Alternative.

GENERAL COMMENTS

F-009-001

The Department agrees that there is no prudent and feasible avoidance alternative to the "use" of Section 4(f) resources. For those resources that are also protected by Section 106 of the National Historic Preservation Act, the Department defers to the Washington State Historic Preservation Officer. The Department appreciates the efforts that the AWV Project Office, Washington State Department of Transportation (WSDOT), Federal Highway Administration (FHWA), and City of Seattle have made in talking with the National Park Service, and in addressing waterfront/pier access issues in the publication, "Keeping Downtown Open and Livable During Construction." We encourage the AWV Project Office and coordinating agencies to take all reasonable measures in keeping the downtown waterfront a vibrant hub of activity, even during construction.

F-009-002

The SDEIS is well written and provides a thorough review of the scope, benefits, impacts, and effects of each alternative on fish and wildlife resources. Aspects of the

F-009-001

Thank you for your comment. Please note that the Section 4(f), 6(f), and 106 evaluations have all been updated in the 2010 Supplemental Draft EIS and this Final EIS. FHWA, WSDOT, and the City of Seattle have worked hard to coordinate with the appropriate parties concerning the identification of and potential effects to Section 4(f) and Section 6(f) resources in the project area. The lead agencies have also identified potential measures to mitigate construction effects in an effort to keep the waterfront area vibrant, even during construction. These mitigation measures are described in Chapter 8 of the Final EIS.

F-009-002

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative. This alternative would not replace the seawall or require in-water work. An analysis of the potential effects of the project on listed fish and wildlife species has been conducted and provided in Appendix N, Wildlife, Fish, and Vegetation Discipline Report of the Final EIS. This information is summarized in the Final EIS. In addition, a biological assessment has been prepared for the preferred alternative.

F-009-002 project that would likely have the most significant impact on fish and wildlife and on listed species include the replacement of the Seawall and associated habitat improvements, construction of the overwater structure between Pier 48 and Colman Dock, stormwater effects, and re-suspension of contaminated sediments.

The SDEIS does not provide an in-depth analysis of potential impacts to threatened and endangered species. We note that the FHWA and WSDOT will be consulting with the Fish and Wildlife Service (FWS) under Section 7 of the Endangered Species Act. A more thorough review of the impacts to threatened and endangered species will be required at that time.

SPECIFIC COMMENTS

F-009-003 ***Consultation with Regulatory Agencies: Page 25, No. 8; Page 33, No. 18; Page 104, No. 23; etc.***

It is stated throughout the SDEIS, that the FHWA, the WSDOT and the City of Seattle (City) would work with the regulatory agencies to improve any fish and wildlife habitat affected by the project, to evaluate conservation measures to avoid, minimize, rectify, or compensate for impacts to species and their habitat, and review mitigation plans. The FWS has been coordinating with the FHWA, WSDOT, and the City throughout the project design to identify and minimize potential impacts to fish and wildlife. The FWS will continue to be available to provide technical assistance for any mitigation, restoration, and enhancement projects to improve habitat for fish and wildlife.

F-009-004 ***Temporary Access Bridge: Page 68, No. 15***

The SDEIS states that a temporary, 15,000-square-foot access bridge would be constructed instead of a permanent 33,000-square-foot overwater pier between Pier 48 and Colman Dock. It is unclear from the SDEIS how long the temporary access bridge would be in place (additional information on the access bridge was given on pages 76 and 101). On page 101, the SDEIS states that the bridge would be constructed within the first 30 months and would remain until construction is complete. A temporary bridge constructed and used for six to eight years could have significant impacts to the aquatic environment, even with a smaller surface area. Please analyze these effects on listed species and their critical habitat.

F-009-005 ***Removal of Riprap: Page 77, Step 2 and Page 79, Step 2***

The SDEIS states that crews may remove riprap adjacent to the seawall. It further states that once the riprap is removed, a sheet pile wall, silt curtain, or equivalent protective measure would be installed. The FWS recommends that a silt curtain be placed in water prior to the removal of the riprap. Removal of the riprap can create significant turbidity and result in impacts to aquatic species.

F-009-003

FHWA and WSDOT greatly appreciate the efforts extended by the USFWS staff during the course of the project. A biological assessment has been prepared for this project and the biological opinion from NMFS was received on January 27, 2010.

F-009-004

The temporary over-water structure that could be in place for up to 8 years with the Cut-and-Cover Tunnel or Elevated Structure Alternatives, could impact the aquatic environment, depending on the water depth and orientation of the structure. Assessment of potential effects associated with a temporary over-water structure is included in the Final EIS Appendix N, Wildlife, Fish, and Vegetation Discipline Report. The preferred Bored Tunnel Alternative, does not require the temporary structure referred to in this comment.

F-009-005

In areas where it is necessary to remove riprap for construction associated with the seawall, a turbidity curtain or equivalent protection will be installed prior to riprap removal to minimize turbidity and effects to aquatic species.

- F-009-006** | **Temporary Sheet Pile Wall: Page 102, No. 19**
 The document states that a temporary sheet pile wall, silt curtain, or equivalent measure would be installed to protect water quality in Elliott Bay. The document further states that in the Draft Environmental Impact Statement (DEIS) the use of a silt curtain was proposed, but a temporary sheet pile wall was not included. It is the understanding of the FWS from meetings held with the action agencies that it may not be possible to install a sheet pile wall because of the existing riprap and other material placed along the Seawall. The final SDEIS should accurately describe and evaluate how water quality in Elliott Bay would be protected because the installation of a sheet pile wall with an impact pile driver may have adverse effects to listed fish species.
- F-009-007** | **Turbidity and Sediment: Page 102, No. 20**
 The second paragraph states that temporary turbidity impacts could result from disturbing the bottom sediments, which could be contaminated, during installation of the sheet pile wall. We could not find a description of these contaminants or their effects on aquatic species. Please evaluate these effects to listed fish and other fish and wildlife resources.
- F-009-008** | **Appendix R; Fisheries, Wildlife, and Habitat Discipline Report; Page 2, 1.2 Proposed Project**
 The first paragraph states that Appendix R focuses on the Seawall portion of the project along the edge of Elliott Bay because the only fish, wildlife, and vegetation resources that occur within the project area are associated with Elliott Bay and its shoreline. As noted below, there are potential effects to listed fish, designated critical habitat, and other fish and wildlife resources in Lake Union due to the construction, operation, and maintenance of SR-99. The final SDEIS and Appendix R should identify and describe all impacts to listed fish in both Elliott Bay and Lake Union.
- F-009-009** | **Appendix R; Fisheries, Wildlife, and Habitat Discipline Report: Page 7, 2.2 Existing Environment**
 Appendix R states that designated bull trout critical habitat includes the nearshore areas of Elliott Bay. The SDEIS states that treated stormwater or dewatering water could be discharged to Lake Union using a temporary outfall or through existing outfalls. Lake Union and the Lake Washington Ship Canal are also designated critical habitat for bull trout. Please analyze the effects of the project on bull trout and designated bull trout critical habitat in both Elliott Bay and Lake Union.
- F-009-010** | **Appendix R; Fisheries, Wildlife, and Habitat Discipline Report; Page 23, 5.4 Benefits**
 Bullet #3 states that numerous creosote-treated piles would be removed along the face of the existing seawall. Further information is needed regarding these piles. It is not clear whether the creosote-treated piles to be removed are abandoned piles no longer in use, supporting piles that would be replaced, or are part of the seawall that is to be replaced. Also, the SDEIS discusses the removal of contaminated soil. If the soil has

F-009-006

Since publication of the 2006 Supplemental Draft EIS, a new containment strategy has been developed to prevent grout and other contaminants from entering the water in Elliott Bay. The containment method was developed in the September 2006 Tunnel Constructability workshop and includes the following procedures and applies to the Cut-and-Cover Tunnel and Elevated Structure Alternatives only:

1. The existing seawall would be surveyed for size and location of cracks and other potential leakage points.
2. Temporary repairs would be made to the existing seawall to retain upland grout when it is placed.
3. A turbidity curtain would be installed to minimize turbidity in the construction area and prevent water quality impacts outside the work area.
4. A movable containment panel would be installed adjacent to the existing seawall, including impervious mat to be placed over the riprap adjacent to the seawall. The size and location of the panel-mat system would be determined by the secant pile installation and grouting operations.

In certain areas, a sheet pile wall may be necessary for containment. A turbidity curtain would be installed prior to installation of the sheet pile wall or removal of riprap for placement of the sheet pile wall. The turbidity curtain will minimize or prevent turbid water from leaving the construction area and impacting water quality.

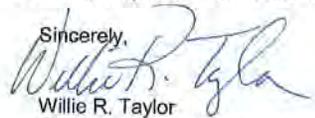
F-009-007

The construction methods were modified to minimize the use of sheet pile barriers in an effort to reduce the amount of in-water work required to replace or repair the seawall. Results of the most recent sediment sampling program are provided in the Final EIS and its Appendix Q, Hazardous Materials Discipline Report. The potential effects of these

F-009-010 greater than 5 percent woody debris consisting of creosote-treated material, then the soil should be removed and transported to a landfill. Please describe more clearly the creosote-treated piles to be removed and evaluate the potential effects of their removal, including the resuspension of contaminated sediments and creosote on listed fish and their prey species.

SUMMARY COMMENTS

F-009-011 We appreciate the opportunity to provide comments on the SDEIS for the SR-99 Alaskan Way Viaduct and Seawall Replacement Project. We recommend that the final SDEIS fully disclose all direct, indirect, and cumulative impacts to fish and wildlife and their habitats, including any listed species and their critical habitat. We encourage FHWA and WDOT to continue consultation and coordination with FWS staff regarding means and measures to ameliorate the project's effects on fish and wildlife and other environmental values. Consultation with the FWS pursuant to section 7 of the Endangered Species Act should begin as soon as possible. Questions or concerns regarding these comments, or requests for additional information regarding potential project effects on fish and wildlife resources should be directed to Mr. Ken Berg, Project Leader, U.S. Fish and Wildlife Service, Western Washington Fish and Wildlife Office, 510 Desmond Dr. SE, Suite 102, Lacey, Washington 98503; telephone: 360-753-9440.

Sincerely,

Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

cc: (see next page)

compounds on aquatic life is also discussed in the Final EIS and in its Appendix N, Wildlife, Fish, and Vegetation Discipline Report.

F-009-008

The potential effects of the project on fish and wildlife in the Lake Union basin, as well as Elliott Bay, are included in the Final EIS Appendix N, Wildlife, Fish, and Vegetation Discipline Report. Specific analyses of potential project effects on ESA-listed species and designated critical habitat are included in the biological assessment for the preferred Bored Tunnel Alternative. The primary factors potentially affecting fish and wildlife in the Lake Union basin are water quality issues related to runoff during construction and operation of the project. These potential effects are also addressed in Appendix O, Surface Water Discipline Report, of the Final EIS.

F-009-009

Effects of the project on bull trout and designated bull trout habitat were analyzed in the project's Biological Assessment. The Final EIS contains a general discussion of project effects on fish during project operation in Chapter 5 and construction in Chapter 6.

F-009-010

There are a number of sources of creosote piles in the project area. For the Cut-and-Cover Tunnel and Elevated Structure Alternatives, the removal of a portion of the overwater structure at Pier 48, as prior mitigation for constructing the temporary overwater ferry access bridge, would result in the removal of at least 300 piles from the nearshore habitat. In addition, there are a number of wooden piles that support the overhanging sidewalks along the waterfront. These would be removed and replaced with cantilever sidewalk support structures. Under the Cut-and-Cover Tunnel and Elevated Structure Alternatives, the removal of the existing seawall face would also result in the removal of a number of

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cc:
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Grace Crunican
Director of Seattle Department of Transportation
700 5th Avenue, Suite 3900
PO Box 34996
Seattle, WA 98124-4996

support piles and associated timbers. The removal of such material is part of the mitigation for the project, leading to long-term beneficial effects on aquatic resources in the area. The Bored Tunnel Alternative does not include the replacement of the existing seawall, or any in-water construction activities, so none of the creosote piles and timbers would be removed as part of the preferred alternative. Discussion of the potential effects of creosote pile removal is discussed in Appendix N, Wildlife, Fish, and Vegetation Discipline Report, of the Final EIS.

Vibratory and direct pull methods of pile extraction are preferable over the use of a clamshell dredge. However, the least environmentally impacting method of pile removal shall be used as appropriate for the site conditions. In area of contaminated sediments, the pile might be cut off near the mudline and capped to minimize disturbance of the substrate. Clean sediments would be placed over areas where piles have been removed.

F-009-011

A biological assessment was submitted to the Services identifying the direct and indirect impacts of the Bored Tunnel Alternative on ESA-listed species and habitat, thereby initiating the ESA Section 7 consultation. The biological assessment also addresses the cumulative effects of other past, present, and future non-federal projects occurring within the project action area. This information is summarized in the Final EIS, along with the direct, indirect, and cumulative impacts of the project on other fish and wildlife species. The project team greatly appreciates the involvement of USFWS, NMFS, and other resource agencies throughout the NEPA process, and will continue to coordinate with these agencies both within and outside of the ESA consultation process.



RECEIVED
JUN 14 2004
AWSP Team Office

June 8, 2004

Ms. Allison Ray
Alaskan Way Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Ray:

Re: "SR 99: Alaskan Way Viaduct & Seawall Replacement Project" Draft Environmental Impact Statement (DEIS).

S-001-001

Attached you will find the Department of Ecology's (Ecology) comments on the "SR 99: Alaskan Way Viaduct & Seawall Replacement Project" Draft Environmental Impact Statement (DEIS). Several of these comments may duplicate those that Ecology submitted on February 27, 2004 following our review of the Preliminary DEIS. For the record, we would like to have any Ecology comments that were made on the preliminary DEIS, but not incorporated into the DEIS, included in the Final EIS comment section.

Ecology's comments cover four key areas: shorelines, water quality, air quality, and hazardous waste. Our comments also include two attachments: "Attachment A" which is a copy of the applicable sections of the Seattle Shoreline Master Program; and "Attachment B" which includes "Clean Construction Zone" mitigation measures. We provide both attachments with the intent that they be included in the record in the Final EIS comment section.

Finally, we have included several comments relating to the formatting, readability, and comprehensiveness of the DEIS. We applaud the Washington State Department of Transportation's (WSDOT) efforts to completely restructure the DEIS document so that the information is more readily accessible to agency reviewers as well as the public. Overall, we found the main document to be user-friendly, with the information presented in an interesting manner. You will see our more specific, varied comments in the enclosure.

Should you have questions about Ecology's comments, please do not hesitate to call me at 360.407.6789. I look forward to continuing my work with the Resource Agency Leadership Team for the Viaduct project.

Sincerely,

Therese M. Swanson
Therese M. Swanson
Ecology-WSDOT Liaison

S-001-001

The project has changed substantially since the Draft EIS was submitted in 2004. Because of this, we have responded to comments submitted in this comment letter but have not included comments made on February 27, 2004.

Thank you for providing specific feedback related to the format of the Draft EIS. We are pleased that Ecology thought the document was more user-friendly and accessible to public and agency reviewers.

DEPARTMENT OF ECOLOGY COMMENTS
ALASKAN WAY VIADUCT DEIS

I. SHORELINE MANAGEMENT

S-001-002 Ecology reviewed the Draft DEIS and associated appendices (Appendix D - *Visual Quality Technical Memorandum* and Appendix G - *Land Use and Shorelines Technical Memorandum*) as they relate to the Shoreline Management Act (SMA) and the Seattle Shoreline Master Program (SMP). The key comments are related to:

- A Lack of Visual Analysis of Each Alternative
- Inconsistency Between the "Goals", "Policies" and "Regulations" Attributed to the Seattle Comprehensive Plan vs. the Seattle Shoreline Master Program
- Need to Increase Emphasis on Need for Consistency between the Shoreline Master Program and the Selected Alternative. Amendments May Be Required.
- Loss of Public Parking and Public Access Mitigation Issues
- Inclusion of Shoreline Map

Specific comments are as follows:

S-001-003 A. A Visual Analysis of Full Build-Out for Each Alternative Should Be Provided (Appendix D).

Additional photographs and view analyses for each alternative should be included in the EIS. For example, there are differing opinions that the Alaskan Way Viaduct is both *blocking* and *providing* views and vistas of Elliott Bay, Puget Sound, and the Olympic Mountains. A view analysis including both perspectives would provide more clarity for this issue. There are too few examples of what one is able to see or is prevented from seeing from the various points discussed. The text-only analysis should be enhanced with a view analysis and additional photographs.

S-001-004 B. A Discussion of Mitigation Should Be Included Due to Possible Loss of Views from the Alaskan Way Viaduct (Appendix D).

Views within shoreline jurisdiction are one of the key elements of the Shoreline Management Act. While there are some photographs of views and view blockages in the general DEIS, there are no photographs of views or vistas as seen *from* the AWV towards Elliott Bay and Puget Sound in either the DEIS or Appendix D. The Alaskan Way/Alaskan Way Viaduct is designated as a State scenic route and corridor from which approximately 110,000 people per day have the vistas of Elliott Bay, Puget Sound, and the Olympic Mountains.

It should be acknowledged that the views from this public shoreline visual access route will be removed under the Surface, Tunnel, and Bypass-Tunnel Alternatives. Mitigation for the proposed loss should be discussed, since there is no requirement or proposal in

S-001-002

Thank you for reviewing the 2004 Draft EIS, Appendix D, and Appendix G. Responses to your key comments are addressed in the specific responses to comments that follow.

S-001-003

Views from the existing Alaskan Way Viaduct, and similar views from the Elevated Structure, Cut-and-Cover Tunnel, and Bored Tunnel Alternatives were assessed in the Final EIS. Appendix D, Visual Quality Discipline Report, and Appendix E, Visual Simulations, were also prepared to support the Final EIS. These documents provide an assessment of the visual character and quality of the views, as well as the likely viewer response of drivers and passengers. Scenic views from the SR 99 roadway are described in the text as an element of enjoyment for drivers and passengers.

For all the alternatives, a variety of scenic views are available to a variety of groups of viewers with a range of sensitivity based on the activities of the viewers. A thorough discussion of both visual resources and viewer response is provided in the Final EIS and its Appendix D, Visual Quality Discipline Report. Decision-makers are provided with an assessment of the range of visual quality impacts for the alternatives as one of a multitude of factors.

S-001-004

Many people have expressed that they enjoy the views when traveling on the viaduct. The visual character and quality of the views, as well as the likely viewer response of drivers and passengers, were discussed for each alternative in the 2004 Draft EIS, 2006 and 2010 Supplemental Draft EISs, and Final EIS.

The Final EIS analysis considers views in the SR 99 corridor, which is designated as a City of Seattle Scenic Route, and identifies and

S-001-004

this DEIS that the land vacated by the removal of the Viaduct will remain as open space. Instead, development might occur on private or public land in the vacated corridor that would block much more shoreline and water views from the uplands than the 50 ft. high Alaskan Way Viaduct.

S-001-005

C. Inconsistently Referenced and Worded Goals, Policies, and Regulations between the Seattle Comprehensive Plan and Shoreline Master Program (Appendix G - Land Use and Shorelines Technical Memorandum)

The "goals" and "policies" are the driver of a Shoreline Master Program and are therefore critical to understand in the course of developing a project in shoreline jurisdiction.

In this case, the goals, policies and regulations in Appendix G that are attributed to both the Seattle Comprehensive Plan and the Seattle Shoreline Master Program do not appear in either planning document as quoted in the AWV documents.

For example, the Goals and Policies for Shoreline Economic Development are listed as on p. 46 of Appendix G as:

LG99 Encourage economic activity and development of water dependent uses by *supporting the retention and expansion of existing water-dependent businesses and planning for the creation of new developments in areas now dedicated to such uses.*

LG100 Allow a multi-use concept of development, provided that the major use is water dependent and development provides public access to the shoreline yet maintains the economic viability of the use.

The italicized phrase above is not in the current, official, Ecology-approved Seattle Shoreline Master Program (July 31, 1997). The Economic Development goals and policies in the formally adopted Seattle SMP are:

S-001-006

Economic Development:

GOALS

G87 Encourage economic activity and development of water dependent uses by planning for the creation of new developments in areas now dedicated to such use.

G88 Allow a multi-use concept of development, provided that the major use is water dependent and that provides public access to the shoreline yet maintains the economic viability of the use.

assesses designated view corridors primarily along east-west streets. Views from the road and of the road are both assessed. Visual quality mitigation measures are presented in Chapter 8.

S-001-005

Your comments about inconsistency in the 2004 Draft EIS are noted. Please note that Appendix G, Land Use Discipline Report, has been revised since the publication of the 2004 Draft EIS. See Appendix G, Land Use Discipline Report, of the Final EIS for the current discussion of the Seattle Comprehensive Plan and Seattle Shoreline Master Program goals and policies.

S-001-006

The project would support Goals G 87 and G 88 identified in this letter in much the same manner as Goals LG 99 and LG 100 in the Comprehensive Plan. The build alternatives would provide access to the downtown and waterfront areas. Improved visual and pedestrian connections may also result from the build alternatives, especially with the tunnel alternatives. These changes may assist in encouraging new development and economic activity downtown and along the waterfront.

Regarding Policies L186 through L189 in this letter, the proposed project would not direct potential land uses to certain areas along the waterfront. It may result in opportunities for new uses in places along the project route; however, the type of uses and where they might be concentrated or otherwise located would be determined by other factors such as zoning and development regulations. These regulations may or may not meet policies calling for incentives for public amenities on private property and objectives for water-dependent businesses or other uses. Additionally, the City has the Central Waterfront Plan and the Central Waterfront Project that will help guide potential development opportunities in this area.

S-001-006

POLICIES

- L186 Concentrate industrial and commercial shoreline uses by planning for the creation of new developments in areas now dedicated to such use.
- L187 Identify and designate appropriate land adjacent to deep water for uses that require such condition, such as industry or commerce.
- L188 Provide incentives for public amenities on private property.
- L189 City-wide objectives for different types of water-dependent businesses and industries (A-G).

Discrepancies should be eliminated and the AWV Alternatives should be reviewed in light of the goals and policies in the official SMP as approved by Ecology. In addition, if the numbering and lettering system in the Comprehensive Plan and Municipal Code differ from those employed in the official Shoreline Master Program, cross references or cross citation should be used.

As there are unexplained discrepancies between the stated goals and policies of the Seattle Comprehensive Plan and Seattle SMP in Appendix G, it is important that the official goals and policies of the Seattle SMP be made clear to the public. The approved SMP Goals and Policies are provided in Attachment A.

S-001-007

D. Selected Alternative Must Be Consistent with the Current or Amended SMP

The choice of the preferred Alternative is likely to drive the development or re-development of the Central and South Harbor front. The current shoreline designations in the SMP, with their preferred and permitted uses, should impact the way the Alternatives are assessed. Discussion of the various Alternative designs should acknowledge and reflect the specific SMP components mentioned in Attachment A. The discussion should reflect how they are consistent with the adopted Seattle SMP Goals and Policies and how they support the preferred uses. Alternatively, the DEIS could explain how the current SMP would need to be amended to allow the various Alternatives. The SMP would have to be amended according to Chapter 173-26 WAC prior to commencement of the shoreline permitting process.

S-001-008

E. Provide A More Complete Description and Focus on the Seattle Shoreline Master Program (Appendix G, Section 4.8.2. - Local Plans and Policies, p.33)

This section of Appendix G lists and describes various plans that apply to the project, including the Seattle Comprehensive Plan and Shoreline Master Program. There is a high degree of focus on the Comprehensive Plan.

The Seattle Shoreline Master Program is discussed in one sentence as being a part of the Seattle Municipal Code. Put simply, this not enough information to adequately convey the importance of the Seattle SMP and its associated goals, policies, shoreline designations, and development regulations on this project corridor.

S-001-007

It is not certain that the "choice of a preferred alternative is likely to drive the development or redevelopment of the Central and South Harbor front." Future development would also be determined by a number of other factors, like local economic conditions. Development and zoning regulations will have a strong influence on future development throughout the project area. Additionally, the City has the Central Waterfront Project which also will help to guide development there.

Shoreline goals and policies, as expressed in Attachment A, would provide additional guidance for future uses along the waterfront. The project will comply with appropriate shoreline regulations in place at the time of construction. Permit conditions likely to be attached to project approvals would help assure this compliance. Regarding goals and policies of the shoreline program, it is expected that the project would be consistent with the intent of many of these objectives, as indicated in the Final EIS Appendix G, Land Use Discipline Report.

S-001-008

The 2004 Draft EIS Land Use Technical Memorandum did address potential impacts related to shoreline goals and policies. Although page 33 did refer to the Shoreline Management Plan in a single sentence as noted, that same report devoted six pages (pages 45 to 50) to analysis of potential impacts related to specific shoreline goals and policies. This information has been updated in the Land Use Discipline Report (Appendix G) included in the Final EIS. It is acknowledged that the shoreline program will provide important direction for future land use in the project area, including construction of the project.

S-001-008

Further explanation of the SMA and SMP as they relate to each of the alternatives, as they are all within shoreline jurisdiction, should be provided. Shoreline jurisdiction under the Shoreline Management Act (RCW 90.58) and Seattle SMP extends from the ordinary high water mark (generally the Seawall) landward 200 feet. In shoreline jurisdiction, the Seattle SMP goals, policies and regulations take precedence over other applicable plans and codes.

As a final suggestion for additional information, include the City's introductory paragraph to its SMP/Comprehensive Plan (Section H. – SHORELINES) as it succinctly identifies for the public the importance of the shoreline regulations:

"In conformance with the goals of the State Shoreline [Management] Act, the Seattle Shoreline Master Program is established to accommodate a variety of functions and activities unique to shoreline areas, especially water dependent businesses and shoreline recreation activities, and to protect and enhance public access, natural areas and views of the water. Management of Seattle's shorelines is guided by the Area Objectives for Seattle's shorelines as established in these policies, and the purpose of the shoreline environments, the shoreline environment designations, and the use regulations and development standards established in the (Land Use Code). All of these elements combined constitute the Seattle Shoreline Master Program."

S-001-009

F. New Over-Water Pier at Colman Dock, SMP, and Permitting

A new over-water pier at Colman Dock and Pier 46 is proposed for all Alternatives as part of this project. If it is to be reviewed as part of this DEIS, more information is needed. The water-dependency aspect of this use is not clear. A pier that is proposed for non-water dependent uses is not consistent with the SMA (RCW 90.58.020) or the Seattle SMP.

S-001-010

G. Parking and Public Access Mitigation Measures

It was noted in the DEIS and Appendix G that over 700 surface parking places will be lost in the Central Harbor front if either the Tunnel and Bypass Tunnel Alternatives are chosen. The loss of that amount of parking in a retail and tourist area is likely to impact uses by causing closures of businesses and reduce public access to the shoreline due to lack of parking. Parking on the Seattle downtown waterfront is currently limited, and this would restrict access further.

The Appendix states that no mitigation for this loss is planned, but it should be considered as there is likely to be a great negative impact on the public and on the project corridor businesses that have no dedicated parking.

S-001-011

H. Shoreline Designation Map (Appendix G – p. 30)

S-001-009

For the preferred Bored Tunnel Alternative, the construction of a temporary ferry access bridge would not be necessary.

However, both the Elevated Structure Alternative and Cut-and-Cover Tunnel Alternative would include construction of a temporary ferry access bridge between Pier 48 and the Colman Dock ferry terminal. This would be necessary to maintain vehicular access to the ferry operations during construction. This temporary structure would be needed to allow cars to travel from remote ferry holding to the ferry loading terminal. As such, this use would be accessory to the Washington State Ferries water-dependent use. The project would obtain permits as necessary for this temporary use.

S-001-010

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront

S-001-011 Ecology recommends including a map of shoreline designations similar to the map that is included for Exhibit 4-7 - Project Area Zoning Map after Page 25.

II. AIR QUALITY

S-001-012 Ecology commends WSDOT on a thorough review of the Alaskan Way Viaduct and Seawall Replacement Project's air quality impacts due to criteria pollutants. We are, however, providing specific comments on the assessment of the air quality impacts due to air toxics from construction related activities and for associated mitigation measures to reduce air toxics generated by the proposed project.

Appendix Q, Air Quality Discipline Report, of the DEIS clearly acknowledges the identification of mobile source related hazardous air pollutants as contributing the greatest risk in the Puget Sound Region. The appendix later acknowledges that an Ecology air toxics study in Georgetown identified that the single greatest air toxics risk is associated with diesel particulate emissions. Appendix 4.10.4 states that as the project develops further, a detailed construction impact analysis will be developed that evaluates short and long duration emissions from construction activities.

The section, "Construction Impacts and Mitigation", acknowledges that roadway capacity in the corridor will be reduced on both SR99 and the Alaskan Way surface streets, neighboring streets will be closed at times, detours will be established, and congestion will increase.

The "Other Things to Consider" section addresses cumulative impacts and acknowledges that additional major transportation projects will be under construction during the same time period as that proposed for the Alaskan Way Viaduct, and that these projects will also significantly impact downtown traffic and transit. Six projects are specifically identified: the Link Light Rail Project, the Monorail, the SR 519 Intermodal Access and Surface Improvements, the Mercer Street Corridor Improvements, the I-5 Improvements, and the Coleman Dock Ferry Terminal Expansion.

Emissions from increased traffic congestion, plus the emissions from the construction of these major transportation projects, will significantly impact air quality in the downtown Seattle area for the next seven to ten years. Additionally, these impacts will offset air quality benefits that have been achieved by the Puget Sound Clean Air Agency's aggressive initiation of "Diesel Solutions", a voluntary program encouraging the use of ultra-low sulfur diesel and the retrofitting of diesel engines with emissions control technology.

While a thorough assessment of the air toxics emissions per appendix 4.10.4 could further characterize the air toxics risk for the downtown Seattle region, the impacts of diesel emissions in the Seattle area are already sufficiently well-established to support the conclusion measures are needed to reduce diesel particulate emissions. For this reason, Ecology recommends that the Department of Transportation adopt a "Clean Construction" zone encompassing all areas impacted by these major projects identified in the Alaskan Way Viaduct DEIS

- piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide frequent parking updates
- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

S-001-011

The Seattle Comprehensive Plan designations appear on updated exhibits and in Appendix G, Land Use Discipline Report, included in the Final EIS.

S-001-012

A Memorandum of Agreement has been developed between WSDOT and the Puget Sound Clean Air Agency to help eliminate, confine, or reduce construction period emissions for many larger and longer term projects in Washington State.

Mitigation measures, including those for air quality, are described in the Final EIS.

S-001-012 An effective "Clean Construction Zone" includes the following:

- All diesel equipment uses ultra-low sulfur diesel.
- All diesel equipment fifty horse-power or greater, that is on the job for greater than thirty days, is equipped with diesel oxidation catalysts, or emission control technology or repowering that achieves similar emissions reductions.
- A staging zone is established for trucks that are waiting to load or unload material in a location where public exposure to diesel emissions is minimized.
- All idling is limited to three minutes or less.

During the past two years, staff from WSDOT, Ecology, the Puget Sound Clean Air Agency, the Puget Sound Regional Council, Region 10 EPA, the Federal Highways Administration, and the Federal Transit Association has participated in a series of air quality "Round Table" discussions associated with proposed transportation projects in the Central Puget Sound Region. During these meetings, Ecology and the Clean Air Agency regularly communicated their concerns to WSDOT regarding potential increases in toxic air emissions from transportation projects that might impact the area's residential and business districts. Ecology specifically identified reconstruction of the Alaska Way Viaduct as the project most likely to impact air quality in the downtown Seattle area.

Ecology fully supports a collaborative approach between air and transportation agencies that best serves the citizens of Washington: one that resolves these air quality concerns, while still addressing the transportation needs for the Puget Sound Region. Ecology invites the Department of Transportation to work with the Air Program to begin implementation of developing a "Clean Construction" zone by participating in a "Clean Construction" workshop hosted by Ecology scheduled for Fall, 2004. Our attachment contains comments that provide greater detail on the need for the mitigation measures described above and how best to achieve them. (See Attachment B).

III. HAZARDOUS WASTE

S-001-013 We are resubmitting the Hazardous Waste comments from Ecology's preliminary DEIS comments:

AWV Hazardous Materials Discipline Report

- A. Mid-to heavy-range petroleum hydrocarbons usually contain several different polyaromatic hydrocarbons (PAHs), some of which are carcinogens. PAHs need to be addressed here. (p.87)
- B. Chlorinated compounds, like TCE and PCE, produce their breakdown products, like dichloroethylene (DCE) and vinyl chloride (VC) in subsurface by anaerobic biodegradation. DCE and VC are very common constituents in contaminated dry cleaning sites. (p.87)

S-001-013

The following text has been inserted into Appendix Q, Hazardous Materials Discipline Report:

Polycyclic aromatic hydrocarbons (PAHs) – some of which are carcinogenic, are present in heavy-range petroleum hydrocarbons and are also created during the burning process as result of incomplete combustion. PAHs are also present in creosote, which is primarily comprised of heavy-range petroleum hydrocarbons. PAHs may be associated with petroleum releases, such as leaking heating oil USTs, lubricating oils from the former railroad use, burned timbers, and creosote treated timbers or pilings that may have been used to support railroad trestles, the former elevated roadway (Alaskan Way), or piers along the waterfront.

The following text was inserted in the discussion of solvents: "These compounds result in breakdown products such as dichloroethylene (DCE) and vinyl chloride that are also associated with dry cleaning operations."

IV. WATER QUALITY

- S-001-014**
1. Need additional discussion about why the introduction of relatively clean stormwater into the sanitary sewer system should be considered an option. For that option, need a discussion about the minimum CSO treatment that would be provided. Where that option isn't used, but stormwater is discharged directly, need a discussion about the appropriate level of stormwater treatment.
 2. Need additional discussion about why the introduction of relatively clean stormwater into the sanitary sewer system should be considered an option. For that option, need a discussion about the minimum CSO treatment that would be provided. Where that option isn't used, but stormwater is discharged directly, need a discussion about the appropriate level of stormwater treatment.
- S-001-015**
3. According to WSDOT's analysis, the preferred alternative (i.e. convey and treat) appeared to have scored second to the BMP alternative. A detailed discussion should be provided that explains why the BMP alternative was not selected. If the discussion is not included in the FEIS, then it should be included when the facility plan is submitted.
- S-001-016**
4. Page 100, #22. It is not appropriate to say *changes in groundwater flows are insignificant because they are less than the natural fluctuations in groundwater that already occur. Any* increase or decrease will move the fluctuation range up or down and can affect the low of the driest years and/or the high of the wettest years. If the system is already stressed at the driest or wettest end, the change will be of concern.

V. FORMATTING COMMENTS

- S-001-017**
- A. From the shoreline reviewer's perspective, the general DEIS, Appendix D, and Appendix G were not formatted in a manner that was easy to utilize. For example, one had to go to from the DEIS to the Technical Memoranda Appendices, and once there, there were elements missing such as photographs or referenced files (Views) or the correct language for the City SMP/Comprehensive Plan.

The lead agencies would have provided a more valuable product if it were presented in a traditional EIS format of several volumes, with both general and specific information together.
 - B. "The Air Quality Program extends our compliments to the Washington State Department of Transportation (WSDOT) for their excellent work in the development of the on-line format for the Environmental Impact Statement (EIS) for the Alaskan Way Viaduct and Seawall Replacement Project. We found the document to be very educational, well organized, and extremely user friendly."

S-001-014

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS.

S-001-015

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS.

S-001-016

Groundwater levels along the alignment were monitored for a year to evaluate potential seasonal variability. Data was collected hourly using pressure transducers and dataloggers. The groundwater data was also compared to Elliott Bay tide levels at Colman Dock. Groundwater fluctuations are primarily in response to tides. The intent of the EIS statement was that the existing subsurface currently experiences a fluctuation due to tides and the proposed structure is not anticipated to cause greater fluctuations than currently experienced. This issue will be further addressed in the final design of the structure. Mitigation measures for groundwater mounding are included in the Final EIS.

S-001-017

Thank you for providing feedback on the Draft EIS. The majority of



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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RECEIVED
SEP 07 2004
AWWSP Team Office

August 27, 2004

Ms. Kimberly Farley
Washington State Department of Transportation
Urban Corridors Office
401 Second Avenue #560
Seattle, WA 98104

Dear Ms. Farley:

During a recent conversation, I explained to you that Ecology's water quality reviewer for the Alaskan Way Viaduct Draft Environmental Impact Statement (DEIS) wanted to clarify Ecology's water quality comments submitted on the DEIS. I recently discovered that our first two comments were identical and that somehow our second comment was lost from our original submittal. I now have those comments clarified as below:

S-001-018

Issue #1: *The discharge of relatively clean stormwater into a sanitary sewer system (WAC-173-226-100), especially from the areas that were once CSO and are already separated, and also, the different minimum treatment standards for the CSO/or the stormwater.*

- Please demonstrate how you intend to address this issue and, should problems be encountered, discuss mitigation efforts.

Issue #2: *Whether introducing the stormwater into a CSO system would increase volume and duration of one untreated CSO overflow per year.*

- The potential exists to increase the untreated CSO overflow unless otherwise proven.
- Secondly, according to WSDOT's analysis, the preferred alternative (i.e., convey and treat) appeared to be the one that scored second to the BMP alternative—the BMP alternative appeared to have scored higher.
- Please provide a discussion regarding why the BMP alternative wasn't selected. If the DEIS is not the appropriate place to deal with stormwater treatment operations and maintenance, please keep in mind that it will need to be discussed more clearly and in more detail when the stormwater facility plan is submitted.

REC'D SEP 02 2004

Ecology reviewers that provided comments liked the format of the document. We acknowledge that this view is not shared by all Ecology reviewers, and we appreciate your comments.

The lead agencies are glad to hear that the Air Quality Program found the format useful, educational, and user-friendly.

S-001-018

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS.

Ms. Kimberly Farley
8/27/2004
Page 2

Please accept these comments as a replacement to the first three comments in the Water Quality section that we originally submitted to your office on June 8th, 2004. Comment #4 in our original submittal remains unchanged.

I hope that this resubmittal of our comments does not pose an inconvenience for you. If you have any questions regarding this letter, please do not hesitate to contact me at (360) 407-6789 or via e-mail at tswa461@ecy.wa.gov.

Sincerely,



Therese M. Swanson
Ecology-WSDOT Liaison

Shorelands and Environmental Assistance Program Comments
on Draft EIS for Proposed Alaskan Way Viaduct
and Seawall Replacement Projects

Attachment A

Attachment A: Current Seattle Shoreline Master Program Goals and Policies

The Seattle Shoreline Master Program consists of the:

Shoreline Master Program Policies (Ecology-approved, July 31, 1997), which is included in the Seattle Comprehensive Plan - Land Use Element as Section H – SHORELINES; and

Shoreline Master Program Regulations (Ecology-approved, January 16, 1998), which is included in the Seattle Municipal Code as Section 23.60 – Shoreline District.

These two components together comprise the current, official Seattle Shoreline Master Program. Copies are located at both Department of Ecology Headquarters in Lacey and at the Northwest Regional Office in Bellevue.

The Shoreline Master Program Policies/Seattle Comprehensive Plan Land Use Element, Section H – SHORELINES addresses numerous aspects of the Seattle shoreline, including Shoreline Use; Access; Transportation; Conservation; Economic Development; Recreation; History, Culture, and Enhancement; Process; Area Objectives for Seattle’s Shorelines; Height in the Shoreline District; and Land Use Figure 9 – Seattle Shorelines, (environment designations map).

The current formally adopted SMP goals and policies pertinent to the Harbor front and the Project Corridor are listed below:

SHORELINE USE

GOALS

- G75 Establish shoreline uses that result in long term over short term benefit.
- G76 Plan for and encourage the integration and location of compatible uses within segments of the shoreline.
- G77 Locate all non-water dependent uses upland to optimize shoreline use and access.
- G78 Provide a management system that will plan for and permit all reasonable and appropriate use through a system of priorities.
- G79 Protect those areas of shoreline that are geologically dangerous or fragile, or biologically fragile.

POLICIES

L163 Permit only those uses or conditions that retain use options for future generations unless identified benefits clearly outweigh the physical, social, and/or economic loss to future generations since competition between uses for shoreline does not generally occur at one moment, but over a period of time. Water dependent uses generally shall have priority. Preference will be given in the following order:

- 1st Protection and enhancement of natural areas or systems; those identified as containing or having unique geological, ecological, or biological significance.
- 2nd Water-dependent uses: all uses that cannot exist in any other location and are dependent on the water by reason of the intrinsic nature of their operations. However, because of their historic role and legal recognition by the City, floating home moorages are designated as a water-dependent use. Such designation does not imply support for increase of floating home moorages. The intent of this policy is to recognize the existing floating home community in Lake Union and Portage bay, while protecting natural areas, reserving public access to the shoreline, and preventing the displacement of water dependent commercial and manufacturing uses by floating homes. Areas with substantial concentrations of existing floating homes shall be given a designation that preserves residential uses.
- 3rd Non-water dependent uses: those uses that do not need a waterfront location to operate.

L164 Define in the Land Use Code all appropriate shoreline uses and provide site development performance standards and other appropriate criteria indicating minimal acceptable standards and other appropriate criteria indicating minimal acceptable standards to be achieved. Uses shall be preferred in the following order: (A-E)

A. On waterfront lots:

1. Protection and Enhancement. Uses that provide for protection and enhancement of natural areas or systems.
2. Water-dependent uses. Uses which are dependent on the water by the intrinsic nature of their operation.
3. Water-related uses. Uses which are not intrinsically dependent on a waterfront location but whose operation cannot occur economically without use of the water adjacent to the site.
4. Non-water-dependent uses with regulated public access. Uses that are neither water-dependent nor water related because they do not use the water, although a waterfront location may increase their profitability. Such uses provide a public benefit because they provide an opportunity for substantial numbers of the people to enjoy the shorelines of the City.
5. Non-water-dependent uses without regulated public access.

- B. On upland lots: Preferred uses are those that complement uses on adjacent waterfront lots.
- C. The preference for natural areas shall be accomplished by prohibiting uses that would disrupt natural areas or by providing enhancement of such areas where necessary.
- D. Preferred uses will vary according to the purpose of the environment:
 1. If the purpose of the environment is to encourage water-dependent and water related uses, these uses shall be preferred by prohibiting and/or restricting non-water-dependent uses on waterfront lots.
 2. If the purpose of the environment is to provide public access, providing public access shall be preferred by permitting non-water-dependent uses and requiring public access.
- E. The determination that a shoreline area is suitable for a particular water-dependent use shall be made by comparing the area's physical characteristics and existing land-use patterns to the locational requirements of water-dependent uses.

- L165 Identify those areas of shorelines that are geologically or biologically dangerous or fragile and regulate development to prevent damage to property or organisms and the general public.
- L166 Encourage the development of support industries and services on upland lots by permitting a wider range of uses and more flexible development standards than waterfront lots, and avoiding potential incompatibility with water dependent uses on waterfront lots.

SHORELINE ACCESS

GOALS

- G80 Provide for the optimum amount of public access – both physical and visual – to the shorelines of Seattle.
- G81 Preserve and enhance views of the shoreline and water from upland areas where appropriate.

POLICIES

- L167 Increase opportunities for substantial numbers of people to enjoy the shorelines, by permitting non-water-dependent uses providing public access to locate in waterfront areas less suited for water dependent uses, and by requiring public access on public property.

- L168 Promote public enjoyment of the shorelines through public access standards by requiring improvements that are safe, well designed, and offer adequate access to the water.
- L169 Except for single family residences, maintain standards and criteria for public access and private use of publicly owned or controlled shorelines to achieve the following:
- A. Provide linkages between shoreline public facilities via trails, paths, etc., to connect with terminal boating and other recreational facilities.
 - B. Indicate by use of signs and graphics all publicly owned or controlled shoreline.
 - C. If appropriate, offer bonuses for the provision of public access in private property.
 - D. Require public agencies such as the City, Port of Seattle, and King County Metro, etc., to provide public access opportunities at new shorelines facilities and encourage these agencies to provide similar opportunities in existing facilities.
 - E. Provide standards and criteria for view and visual access from upland and shoreline areas.
 - F. Give priority to the operating requirements of the water dependent and water related uses over preservation of views in those environments where water dependent uses are encouraged.
 - G. Limit off premise signs and regulate other signs to enhance and protect views.
- L170 Waterways in Lake Union and Portage Bay are for public navigation access and commerce and in general, the City shall not request that the designation be removed from waterways. The City may request that waterways be vacated only when the City reclaims the area as street right of way or for public park purposes. The City may request that the dry land portion of a waterway be re-designated for the additional purpose of providing permanent public access improvements.

TRANSPORTATION

GOALS

- G82 Develop a transportation network that supports and enhances use of and access to the shorelines.
- G83 Relocate transportation facilities which are functionally or aesthetically disruptive to the shoreline.

POLICIES

- L171 Encourage the transport of materials and cargo via modes having the least environmental impact.
- L172 Encourage the maintenance and future development of inter-modal commuter ferry services, complimentary to other public transportation systems, from both intra-city locations and regional activity centers.
- L173 Streets, highways, freeways and railroads should be located away from the shoreline in order to maximize the area of waterfront lots and minimize the area of upland (in shoreline jurisdiction) lots. Streets, highways, freeways and railroads not needed for access to shoreline lots shall be discouraged in the Shoreline District.
- L174 The primary purpose of waterways in Lake Union and Portage Bay is to facilitate navigation and commerce by providing navigational access to adjacent properties, access to the land for loading and unloading of watercraft, and temporary moorage. The importance of waterways in providing public access from dry land to the water is also recognized.
- L175 Public access shall be preferred use for recaptured rights-of-way. Public rights-of-way may be used or developed for uses other than public access, provided that such cases are determined by the City to be in the public interest and that public access of substantial quality and at least comparable to the right-of-way is provided.
- L176 Shoreline street ends are a valuable resource for public use and access. Public or private use or development or street ends shall be designed to enhance rather than reduce public access.
- L177 Provide public transportation convenient to the shoreline.

CONSERVATION

GOALS

- G84 Preserve, protect and restore areas such as those necessary for the support of wild and aquatic life or those identified as having geological or biological significance.
- G85 Insure that all future uses will preserve and protect environmental systems, including wild and aquatic life.
- G86 Insure continuing scientific study of Seattle shoreline ecosystems.

POLICIES

- L178 Protect the natural environment through use and development standards governing shoreline activities including Best Management Practices (for stormwater).
- L179 Areas identified as special wildlife or fisheries habitat should be developed only if no reasonable alternative locations exist and then only if the project is designed to minimize and mitigate habitat damage.

- L180 Require that all commercial, industrial, or other high activity uses provide means for treating natural or artificial urban run-off to acceptable standards. Developments with industrial and commercial uses that use or process substances potentially harmful to public health and/or aquatic life shall provide means to prevent, to the extent possible, point and non-point discharge of the harmful substances.
- L181 Dredging and disposal of dredge materials shall be conducted in a manner that minimizes short and long-term environmental damage.
- L182 Permit landfill on submerged land that does not create dry land where necessary for a water-dependent or water-related use, for the installation of a bridge or utility line or for wildlife or fisheries habitat mitigation or enhancement. Permit landfill that creates dry land only where necessary for the operation of a water-dependent or water-related use, to repair pocket erosion, or for wildlife habitat mitigation or enhancement. Large amounts of dry land may be created in Lake Union only if specifically approved by the Council for a public park purpose.
- L183 Identify those areas that have potential for restoration to natural conditions, develop standards for the conditions in those areas, and provide incentives for achieving such standards.
- L184 Support programs that inform the public about shoreline conservation practices, and identify methods by which public and private shoreline owners or community groups may encourage wild, aquatic, and botanical life, and require such methods when appropriate.
- L185 Support the study of the shoreline systems that will provide a continuously updated baseline against which to judge the impact of any action.

ECONOMIC DEVELOPMENT

GOALS

- G87 Encourage economic activity and development of water dependent uses by planning for the creation of new developments in areas now dedicated to such use.
- G88 Allow a multi-use concept of development, provided that the major use is water dependent and that provides public access to the shoreline yet maintains the economic viability of the use.

POLICIES

- L186 Concentrate industrial and commercial shoreline uses by planning for the creation of new developments in areas now dedicated to such use.
- L187 Identify and designate appropriate land adjacent to deep water for uses that require such condition, such as industry or commerce
- L188 Provide incentives for public amenities on private property.
- L189 City-wide objectives for different types of water-dependent businesses and industries:
 - A. Cargo Handling Facilities.

1. Reserve space in deep water areas with adequate backup space to permit the Port of Seattle and other marine industries to remain competitive with other ports
 2. Work with the Port of Seattle to develop a long-range harbor plan in order to provide predictability for property owners and private industry in the Duwamish and Elliott Bay.
- B. Tug and Barge Facilities. Retain Seattle's role as the Gateway to Alaska and maintain space for Puget Sound and Pacific trade
- C. Shipbuilding, Boatbuilding, and Repairs. Maintain a critical mass of facilities in Seattle in order to meet the needs of the diverse fleets that visit or have a home port in Seattle, including fishing, transport, recreation and military vessels.
- D. Moorage. Meet the long term and transient needs of all of Seattle's ships and boats including fishing transport, recreation and military. Locate long-term moorage in sheltered areas close to services, and short-term moorages in more open areas. Support the efficient use of Fishermen's Terminal, the Shilshole Marina and other public moorage facilities. Reduce the displacement of commercial moorage by recreational moorage by encouraging the full use of submerged lads for recreational moorage in areas less suited for commercial moorage. Require large recreational marinas to provide some commercial transient moorage as part of their facilities.
- E. Recreational Boating. Maintain Seattle's unofficial status as a "boating capital." Allow a variety of boating facilities from launching ramps for small "car top" boats to major marinas. Provide long-term recreational moorage for residents and sufficient short-term moorage close to cultural and recreational centers for visitors.
- F. Passenger terminals. Maintain and expand the opportunity for residents and visitors for convenient travel by ship to local and distant ports. Encourage more passenger only ferries and cruise ships on the Central Waterfront.
- G. Fishing Industry. Maintain a critical mass of support services including boat building and repair, moorages, fish processors, and supply houses to permit Seattle fishermen to continue to service and have a home-port for their vessels in Seattle waters. Recognize the importance of the local fishing industry in supplying local markets and restaurants. Recognize the economic contribution of distant water fisheries to Seattle's maritime and general economy.

RECREATION

GOALS

- G89 Manage publicly owned shorelines that are suitable for public recreation to optimize their potential.
- G90 Increase the amount of shorelines dedicated to public recreation and open space.
- G91 Identify, protect and reserve for public use and/or enjoyment those areas containing special shoreline qualities that cannot be easily duplicated.

POLICIES

- L190 Allow for increased opportunity for the public to enjoy water-dependent recreation including boating, fishing, swimming, diving and enjoyment of views.
- L191 Designate as suited for water dependent recreation areas having natural beaches, large amounts of submerged land for moorage or sheltered waters and the absence of heavy ship traffic and incompatible heavy industry.
- L192 Provide for recreational boating facilities including terminals, moorage and service facilities on publicly owned land and encourage the provision of such facilities on private property, if the environmental impact is acceptable.
- L193 Increase publicly owned shorelines, giving priority to those areas that lack recreational facilities.
- L194 Explore alternative means (other than acquisition) to provide public recreation at the shoreline and on the water.
- L195 Use submerged lands for underwater parks when feasible.

HISTORY, CULTURE, RESTORATION, AND ENHANCEMENT

GOALS

- G92 Appropriately designate sites and areas of shoreline having historical or cultural significance.
- G93 Support and encourage the restoration of those areas or conditions of the shoreline now unsuitable for private or public use, consistent with economic and environmental goals.
- G94 Upgrade and/or beautify the public shoreline.

POLICIES

- L196 Support and encourage the restoration, preservation and maintenances of areas of the shoreline having significant historical or cultural significance, and a program for shoreline restoration and beautification.
- L197 Consider protection of individual sites or aspects of areas identified as being of historical significance through landmark designation.

PROCESS

GOALS

- G95 Continue shoreline planning by periodically updating the inventory, goals and policies and regulations to respond to changing attitudes and conditions in Seattle's shorelines.

POLICIES

- L198 Conduct periodic assessments of the performance of and the need for change in the Shoreline Master Program.

AREA OBJECTIVES FOR SEATTLE'S SHORELINES

GOALS

- G96 Recognize the unique opportunities in different areas of our shorelines to accommodate different types of water-dependent businesses and shoreline recreation, and to protect and enhance natural areas and views of the water.
- G97 Restore Lower Duwamish Watershed habitat while maintaining the urban industrial nature of the area, its neighborhoods, and the importance of sustaining a healthy and diverse working waterfront and marine ecology.
- G98 Strengthen the vitality of a functioning ecosystem within the Lower Duwamish Watershed by integrating projects into their surrounding environments by supporting a diversity of habitats and by strengthening connections between habitats throughout the Watershed.

POLICIES

- L199 The Lower Duwamish Watershed Habitat Restoration Plan (December 1996, as may be amended from time to time) should be considered by agencies when conducting planning or permitting activities within the watershed.
- L200 It is the intent of the Area Objectives to indicate which of the Shoreline Areas Goals and Policies are to be met on each specific section of shoreline. The Management System for Appropriate Uses as required by the Shoreline Management Act shall consist of the Area Objectives for the diverse areas of Seattle's shorelines, the purposes of the shoreline environments, the shoreline environment designations, and the use regulations and development standards of the Land Use Code.
- L201 The Area Objectives for Seattle Shorelines illustrated in Land Use Figure 9 are as follows:

A. Area Objectives for Shorelines of Statewide Significance

- I. Puget Sound (Residential and Recreational Areas)

(The Puget Sound area includes all of the shorelines on Puget Sound within the City limits except the Shilshole area, Elliott Bay, the Harborfront and the Duwamish Waterways).

- Protect the fragile ecology of the natural beaches and fish migration routes.
- Encourage and enhance shoreline recreational activities, particularly in developed parks.
- Provide for quality public access to the shoreline.
- Preserve and enhance views of the water.
- Protect areas developed for residential use in a manner consistent with the Single Family and Multi-family Residential Area Policies.

2. Elliott Bay

(Elliott Bay area is all shoreline area from 24th Avenue West to SW Atlantic Street, except the Harborfront, Harbor Island, and the Duwamish Waterways)

- Reserve waterfront lots for major port terminals, large water dependent and water related manufacturing and industrial facilities and major water dependent recreational developments.
- Choose shoreline environments that are appropriate for recreational and industrial uses based on water depth, amount of dry land, topography and truck and rail access.
- Protect and enhance migratory fish routes and feeding areas.

3. Harborfront (Central Waterfront)

- Encourage economically viable marine uses to meet the needs of waterborne commerce.
- Facilitate the revitalization of downtown's waterfront. Provide opportunities for public access and recreational enjoyment of the shoreline.
- Preserve and enhance elements of historic and cultural significance.
- Preserve views of Elliott Bay and the land forms beyond.

4. The Duwamish

(The Duwamish area includes the Duwamish River from the south city limits north to South Massachusetts on the east side and Southwest Bronson Street on the west side, and including Harbor Island and the East and West Duwamish Waterways.)

- Preserve the statewide interest by encouraging industrial and port uses in this area where such uses are already concentrated while also protecting migratory fish routes.

- Protect Kellogg Island as an important natural resource for fish and wildlife habitat and the opportunity for the public to view those resources.
- Work with appropriate government agencies and shoreline users to reduce the input of pollutants, restore contaminated areas and regulate disposal of dredge spoils.
- Increase public access and recreational opportunities through the Duwamish Public Access Plan.

5. The Shilshole Area

(The Shilshole area is the shoreline area from Northwest 80th Street on the north, to the Chittenden Locks [on the south]). (Three items)

- Retain the strong water-dependent recreational character of the area. Water-dependent recreational uses and their supporting services are the preferred uses for this area.
- Permit non-water-dependent commercial uses when providing access to the water, protecting views and not usurping land usable for future water-dependent recreational uses.
- On waterfront lots new residential uses may be permitted when adjacent to existing residences. Protect the fish migration routes.

6. Lake Washington and Union Bay (6 items)

B. Area Objectives for Other Shoreline Areas

1. The Ship Canal (2 items)
2. Lake Union and Portage Bay (5 items)
3. Green Lake (2 items)

HEIGHT IN THE SHORELINE DISTRICT

POLICY

L202 The 35-foot height limit of the Shoreline Management Act shall be the standard for maximum height in the Seattle Shoreline District. Exceptions in the development standards of a shoreline environment may be made consistent with the Act and with the underlying zoning where:

- A. A greater height will not obstruct views of a substantial number of residences AND the public interest will be served.
- B. Greater height is necessary for bridges or the operational needs of water dependent or water-related uses or manufacturing uses; or

- C. A reduced height is warranted because of the underlying residential zone;
or
- D. A reduced height is warranted because public views or the views of a
substantial number of residences could be blocked.

Air Quality Program Comments
on Draft EIS for Proposed Alaskan Way Viaduct
and Seawall Replacement Projects

Attachment B

A "Clean Construction" zone would require that most construction equipment be equipped with emissions control technology, that diesel vehicles use ultra-low sulfur diesel, that staging zones for truck loading and unloading are established, and that idling time be restricted. The following points provide details on the need for mitigation measures and how best to achieve them.

1. Federal, state, and local air agencies, and the U.S. Federal Highway Administration have identified diesel particulate matter as significantly and adversely impacting human health at the national, regional, and local level.

The U.S. EPA's National Air Toxics Assessment (as reported in the 2002 Seattle Times Headline, "Seattle Air Ranked in Nation's Worst 5%") indicates that air toxics in the Puget Sound Region are in the top five per cent in the nation. Local air monitoring data indicate that the total air toxics risks is approximately 700 in one million, and the risk from diesel particulate is approximately 500 in one million. Ecology's Air Quality Program has determined that statewide, 90% of the associated cancer risk due to hazardous air pollutants is due to diesel particulate matter.

The U.S. EPA has determined that diesel particulate matter is a likely human carcinogen, and the California Air Resources Board has determined that diesel particulate matter is a human carcinogen. The Washington Comprehensive Cancer Control Plan identifies three environmental carcinogens, diesel particulate, arsenic, and radon. Ecology's Air Toxics Plan identifies diesel particulate matter as the number one toxic air emission of concern.

In addition to carcinogenic effects, fine particles from diesel exhaust pose a significant health risk because they can pass through the nose and throat and lodge deeply in the lungs, causing lung damage, premature death, and aggravating conditions such as asthma and bronchitis. Children, the elderly, and people with existing heart or lung disease, asthma, or other respiratory problems are most sensitive to the health effects of fine particles. Diesel exhaust also contains substantial NOx, VOC, CO2 and sulfate emissions that contribute to ozone formation, acid rain, regional haze, and global climate change.

2. Construction equipment is a significant source of diesel particulate matter in Washington.

Statewide in 2003, mobile sources emitted 29 tons of diesel particulate matter into the atmosphere. Diesel emissions from off-highway equipment and vessels exceeded on-highway vehicles, accounting for 75% of the emitted diesel particulate matter. Construction equipment is the largest individual source category of diesel soot, emitting 7.7 tons per year, compared to on-road, heavy-duty trucks, which emit 6.0 tons per year.

3. Toxic emissions from construction projects can significantly impact downwind populations.

A recent study, conducted by the Northeast States Coordinated Air Use Management (NESCAUM) monitored both upwind and downwind diesel particulate at the following urban and rural locations: a New York City building construction site, a Maine lumberyard, a New Hampshire building construction site, a New Hampshire roadway construction project, and a Vermont dairy farm. Samples were collected within the equipment cabs and at the worksite perimeters, which included nearby residences.

- In all locations, diesel equipment activity substantially increased fine particulate matter exposures for workers and nearby residents, in some cases by as much as 16 times.
- Individual workers' estimated 24-hour exposures exceeded current air quality standards by nearly two to 3.5 times – substantially increasing health risks of workers and nearby residents.
- Diesel PM was estimated to exist at levels that pose risk of chronic inflammation and lung damage in exposed individuals.
- Measured ambient concentrations of acetaldehyde, benzene and formaldehyde around the tested non-road equipment operations were as much as 140 times the federally established screening threshold for cancer risk.

4. Diesel emissions from construction equipment can be controlled through mitigation measures. We cite three case studies.

Case Study 1: I-95 New Haven Harbor Crossing Corridor Improvement Program, Connecticut Clean Air Construction Initiative.

The following contractor requirements apply:

- Emission control devices (such as diesel oxidation catalysts) and/or clean fuels (such as PuriNOx) are required for diesel powered construction equipment with engine horsepower ratings of 60 HP and above that are on the project for assigned to the contract in excess of 30 days.
- Truck staging zones will be established for diesel-powered vehicles waiting to load or unload vehicles. The zones will be located where the diesel emissions will have the least impact on abutters and the general public.
- Idling is limited to three minutes for delivery and dump trucks and other diesel-powered equipment (with some exceptions).
- All work will be conducted to ensure that no harmful effects are caused to adjacent sensitive receptors, such as schools, hospitals, and elderly housing by locating diesel-powered engines away from fresh air intakes, air conditioners, and windows.

Case Study 2: Boston "Big Dig" Central Artery Tunnel Project.

Contractors must:

- Keep equipment properly maintained to minimize emissions.

- Turn off diesel combustion engines not in active use and on dump trucks that are idling while waiting to load or unload material for five minutes or more.
- Establish a staging zone for trucks that are waiting to load or unload material at the work zone in a location where diesel emissions from trucks will not be noticeable to the public.
- Locate construction equipment away from sensitive receptors such as fresh air intakes to buildings, air conditioners, and windows.

The Massachusetts Turnpike Authority in collaboration with the Massachusetts Department of Environmental Protection Agency and the Northeast States Coordinated Air Use Management developed a diesel retrofit program requiring large diesel construction equipment be retrofitted with diesel oxidation catalysts.

Case Study 3: New York City legislation (Introductory #191-A), December 22, 2003.

Any engine fifty horsepower or greater, that is owned or leased by the city, or that is used in any city construction project, must be powered by ultra-low sulfur diesel and the best available technology for reducing emissions of pollutants. This bill initially applies to Manhattan, but will be phased in Citywide over the next two years.

5. The benefits of reducing diesel emissions from construction equipment significantly outweigh the costs.

U.S. EPA Administrator Mike Leavitt's comments on EPA's recently signed federal regulations requiring stringent emissions standards for non-road equipment and a national cap of 15 parts per million sulfur content for both on-road and non-road diesel fuel clearly express the White House Administration's belief in the benefits of reducing diesel emissions.

- Equipping off-highway equipment with diesel oxidation catalysts cost between \$1,500 and \$3,000 per unit, and reduces diesel soot by 20%-30%.
- Using ultra-low sulfur diesel increases fuel costs by three to seven cents a gallon, and reduces diesel soot by 13% to 28%.
- The Regulatory Impact Analysis for EPA's proposed "Non-road Rule" determined that the annual health benefits for requiring cleaner engines and cleaner fuels outweigh the annual cost to comply by a factor of 58:1.

6. Washington State government recognizes the need protect public health by reducing diesel emissions.

Since the operational lifetime of a diesel engines is often twenty-five years or greater, we should not expect to significantly benefit from recent federal rules on diesel engine and fuel standards during the life of the Alaskan Way Viaduct project. Consequently, state agencies must act accordingly to protect public health by reducing diesel emissions. For this very reason, the Washington State legislature granted Ecology \$5,000,000 per year for five years to reduce diesel particulate matter generated by school buses. Governor Locke's Executive Order for Sustainability (# 02-03) directs state government to develop model business

practices, based upon a systematic evaluation of the long-term impacts of an activity or product on health and safety, communities, and the environment for both current and future generations. The workgroups assembled to implement this executive order have determined that reducing air toxics from contracted services is a high priority. Ecology encourages WSDOT to follow the lead of both the Governor and the State Legislature by adopting mitigation measures that reduce diesel emissions from transportation projects.



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
 PO Box 1100 -La Conner, Washington 98257

RECEIVED
 JUN 02 2004
 AWWSP Team Office

May 24, 2004

Ms. Megan White – SEPA Responsible Official
 ATTENTION: Ms. Allison Ray
 Alaska Way Viaduct Project Office (Wells Fargo Bldg.)
 999 Third Ave., Suite 2424
 Seattle, WA 98104

Dear Ms. White:

SUBJECT: State Environmental Policy Act Document; City of Seattle – WSDOT – FHWA Project Co-Proponents, Alaska Way Viaduct and Seawall Replacement Project Draft EIS, Elliott Bay, King County, WRIA 09.0001 Marine

S-002-001 The Washington Department of Fish and Wildlife (WDFW) has reviewed the above-referenced State Environmental Policy Act (SEPA) document received on April 1, 2004, and offers the following comments at this time. Other comments may be offered as the project progresses. The DEIS Discipline Reports Appendix R and S are little changed from the versions reviewed in February 2004. Please incorporate by reference the 2/27/04 App. R, and 3/4/04 App. S WDFW comments provided to your office.

S-002-002 We appreciate the early involvement and coordination that the co-proponents have so far done on this project. We would appreciate receiving a copy of the Biological Assessment when it is provided to the Federal services for their review. There will be close coordination between WDFW, and the services concerning impacts to endangered species, aquatic resources, and water quality during construction.

S-002-003 It appears from the general description of the project alternatives, that a Hydraulic Project Approval (HPA; Chapter 77.55 RCW, WAC 220-110) to be issued by WDFW, will be required for the project. There is, however, insufficient project detail to determine specific conditions to be placed on the project at this stage of the project development. We will continue to participate in the RALF/SAC process, the selection of the preferred alternative, and provide further review and formal comment at the Final EIS stage.

S-002-004 Once final design plans are available, please submit a completed Joint Aquatic Resource Permits Application (JARPA) for an HPA, including complete plans and specifications, to WDFW for review. The plans and specifications should be developed relative to Mean Higher High Water (MHHW), (Datum, Mean Lower Low Water [MLLW] = 0.0 feet). The drawings should accurately depict existing conditions including all prominent natural features and manmade improvements on the bank and beach in the immediate vicinity of the project area. They should include plan and cross-sectional views of the proposed project, a vicinity map of the project area, and accurate directions to the project site. You should allow 45 days from the receipt of a complete application and written notice of compliance with the SEPA process for processing of the HPA.

S-002-005 The following are points that need to be more fully developed, for presentation in the Final EIS:

1. **SEPA** – Under all the alternative descriptions, the proposed construction of a new WSDOT Ferries over-water pier (at Colman Dock) is mentioned. Very limited details of this proposed pier are presented. It is not clear whether, or not, this DEIS for the Alaska Way Viaduct and Seawall Replacement Project is expected to also cover this proposed pier. If this project is to be included, far more detail will need to be provided. Mitigation for pier impacts is also likely.

S-002-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on preliminary drafts of several technical reports. We have coordinated with WDFW while preparing the 2006 and 2010 Supplemental Draft EISs, the Final EIS, and their associated appendices. Your comments have been incorporated as appropriate into the final discipline reports.

S-002-002

Per your request, WSDOT provided a copy of the 2010 Biological Assessment to WDFW on 12/21/2010.

S-002-003

The lead agencies appreciate your involvement during the environmental review process. The preferred Bored Tunnel Alternative would not require an HPA. However, if one of the other build alternatives is selected and it requires an HPA, adequate detail will be provided during the permitting process.

S-002-004

Thank you for providing these details related to the JARPA submittal for the project's HPA. If the selected build alternative requires an HPA, the lead agencies will submit the required information after sufficient designs are developed to provide the necessary plans and specifications requested.

S-002-005

The temporary overwater structure would be needed for either the Cut-and-Cover Tunnel or Elevated Structure Alternatives to maintain access to Colman Dock while the seawall and other nearby structures are under construction. As part of the State Highway System and a critical link the regional transportation network, ferry service must be continued

- S-002-006** | 2. **Partial Collapse of Seawall during reconstruction** – From information presented in RALF meetings and documents, and scattered in these DEIS documents, it is certain that the condition of the seawall and the relieving platform is poor. There are an unknown number of voids behind the seawall, and the wooden connections between the relieving platform and the seawall are tenuous at best. It appears likely that during construction of the new seawall, the additional machinery weight, vibration, and power grouting will cause partial collapse of sections of the seawall, and release of polluted sediments, and high pH grout into the marine environment. The FEIS needs to provide a thorough discussion of this worse case partial collapse, impact of high pH cementitious material on marine organisms, and methods to prevent pollution and damage to marine organisms.
- S-002-007** | 3. **Reconstruction of seawall face** – In the FEIS, it is necessary to provide detailed drawings of the proposed finished face of the seawall, including any riprap. It is necessary to discuss the habitat impact of riprap in the nearshore marine environment. The existing vertical seawall face is not preferred nearshore habitat for many marine species, including juvenile salmonids. It is necessary to improve the habitat value of the Elliott Bay shallow nearshore adjacent to the reconstructed seawall.
- S-002-008** | 4. **Hazardous Sediments in Elliott Bay** – A more complete discussion, and mapping of the polluted sediments along the seawall and other areas disturbed by construction will be needed. It may be necessary to do additional project-specific benthic sediment, and organism sampling in the areas likely to be disturbed. Good information exists in the Appendices, but it should be brought together in the body of the FEIS. The mapping to date appears to have avoided the under pier areas, and the areas nearest the seawall. There should be a thorough discussion of the fate of these pollutants in the aquatic environment, their impact to aquatic life likely to be exposed during construction, and proposals to remove the sediments, or cap them, and how to avoid their disturbance during demolition/construction.
- S-002-009** | 5. **CSO Outfalls** – There should be a detail drawing of the CSO outfalls impacted by this project, the bathymetry of the immediate area, aquatic resources which exist there now, and detailed mapping of polluted sediments associated with them. One CSO is proposed for moving further offshore; this may be useful for more of them. As in comment 2 above, a discussion of the impacts of disturbing polluted sediments, and the possible restoration of these sites, should be included.
- S-002-010** | 6. **Staging Areas** – It is necessary in the FEIS to provide detail on staging areas, barge access, falsework, shoring, etc., and how their use may affect the nearshore environment, disturb polluted sediments, and affect marine organisms.
- S-002-011** | 7. **Stormwater** – Various alternatives will use Convey and Treat, or BMP's and direct discharge. Please make clear why one method was chosen for the alternative, and not another.
- S-002-012** | 8. **Treatment of dewatering effluent** – Myriads of pollutants exist in the materials to be excavated, and in the surrounding sediments that will experience de-watering. Detailed mapping of these historically grossly polluted sites has already been presented. Excavation and de-watering will continue for many years, during all seasons. Once the preferred alternative is selected, a thorough discussion of treatment methods, locations of marine discharge, effluent monitoring and action levels of effluent pollutants, and impact to aquatic organisms are necessary. Permitting for the discharge should proceed more easily once this disclosure is made.
- S-002-013** | 9. **Fire Suppression Chemical Discharge** – The manufacturer recommends not releasing these chemicals into the water, yet that appears to be the intent with this project. Bioassay organisms quoted in the discipline report are for the most part freshwater, not marine. The fish species used are not those from nearshore Puget Sound, nor are there local plankton species.
- S-002-014** | 10. **Mitigation/restoration site development** – Once a preferred alternative is selected, further detailed design of mitigation site work can proceed. WDFW requests continued inclusion on the design team for such mitigation site work. Various alternatives have been briefly discussed elsewhere; site work, methods, monitoring, etc. should be presented thoroughly in the FEIS.

throughout construction. The temporary structure between Pier 48 and Colman Dock will be removed before the end of construction, please see the Final EIS for additional information. The temporary overwater structure is not required for the preferred Bored Tunnel Alternative.

S-002-006

First, please note that under the preferred Bored Tunnel Alternative the Elliott Bay Seawall will be replaced by the City of Seattle as an independent project.

Both the Cut-and-Cover Tunnel Alternative and the Elevated Structure Alternative include replacing the seawall as part of the project. For those two alternatives the engineering team is currently evaluating options to reduce the risk of potential collapse of portions of the existing seawall during construction, to limit the effects if such a collapse should occur. Construction techniques will minimize the size of equipment to reduce the pressure on the existing seawall. Soil strengthening options are also being moved away from the existing seawall to avoid additional pressure on the existing seawall. The team is also evaluating options for isolating the work area from the marine environment, to reduce or eliminate the potential for high pH cementitious material from entering Elliott Bay.

S-002-007

If the seawall is replaced as part of this project, which would occur only if either the Cut-and-Cover Tunnel Alternative or Elevated Structure Alternative is selected, detailed drawings of the seawall face will not be available until later in the design process. At this stage, various treatments are being considered, as are specific treatment options for the vertical seawall to enhance the environment in the project area. The lead agencies welcome input from WDFW to aid in the development of the seawall face.

Information provided in the Final EIS includes all current design

Ms. White
May 24, 2004
Page 3

S-002-014

Detail drawings and construction schedule should be included within the FEIS. Will SEPA/NEPA for the proposed Mitigation site work be covered by the FEIS for the Viaduct/Seawall, or will separate review be necessary? Stormwater - intercepted groundwater - It may be that this large volume of water, if clean enough, may be useful as part of mitigation/restoration site development along the seawall. It may be that the coarse sands and gravels now between the street surface and the top of the relieving platform, if clean enough, may be useful to place in the shallow nearshore.

S-002-015

We encourage the further refinement of construction methods and pollution abatement once the preferred alternative is chosen. WDFW requests being an active participant in these design discussions, rather than to just receive the JARPA application at the end of design and immediately prior to the advertised contract date.

Thank you for the opportunity to provide these comments. If you have any questions, please contact me at (360) 466-4345 x 256.

Sincerely,



Kurt D. Buchanan
Transportation Liaison

KDB:kdb

cc: SEPA Coordinator, WDFW
SEPA Coordinator, Ecology
R. Costello - WDFW Region 4
M. Grady - NOAA Fisheries

information for the seawall. See the Final EIS Appendix N, Wildlife, Fish, and Vegetation Discipline Report, for information about potential habitat enhancement measures.

S-002-008

The environmental analysis is obligated to disclose all potential impacts resulting from the project. As project design progresses, the analysis can be more specific as to what areas of contaminated sediments may be disturbed. The project is committed to meeting water quality standards and future sediment testing where appropriate. Operation of the project is not expected to adversely affect future contamination. To aid in the planning process, project-specific sediment sampling was conducted to identify areas of contamination in the project area and the concentrations of these contaminants. The results of this sampling is presented in Appendix Q, Hazardous Materials Discipline Report, of the Final EIS.

Construction of the new seawall, which would be done if either the Cut-and-Cover Tunnel Alternative or Elevated Structure Alternative is selected, would disrupt very limited amounts of existing contaminated sediment due to construction of the new seawall on the landward side of the existing seawall. Removal and replacement of riprap and installation of sheet pile will disturb small amounts of sediment at the face of the existing seawall, although construction methods are being evaluated to eliminate or substantially reduce the need for removing the riprap during the seawall replacement process, and minimize sediment disturbing activities. In any case, the amount of sediment disruption is not anticipated to be of sufficient quantity or duration to have an effect on the aquatic life that currently resides in the area of existing sediment contamination. The small amount of disturbed sediment is expected to settle primarily in the immediate vicinity of the disturbed site where surface sediment is already contaminated.

Best management practices will be employed to minimize disruption and

redistribution of contaminated sediment. Silt curtains, temporary sheet pile, minimal riprap removal and replacement are examples of measures to be considered to minimize disruption and redistribution of contaminated sediment.

S-002-009

This request is outside of the scope of work for the Final EIS and will likely be addressed during the design and permitting phase of the project. The stormwater and CSO outfalls will likely remain configured as they are currently, and will only be replaced where necessary if the selected build alternative includes seawall replacement. As previously mentioned, the preferred Bored Tunnel Alternative would not include replacement of the seawall as part of the project. Construction impacts related to in-water work in areas of potentially contaminated sediment are discussed in Appendix O, Surface Water Discipline Report, of the Final EIS.

S-002-010

The proposed locations and other details regarding the construction staging areas can be found in the Final EIS Appendix B, Alternatives Description and Construction Methods Discipline Report. Although construction barges may be used for staging and equipment handling, disturbance of nearshore habitat is unlikely. See Final EIS Appendix N, Wildlife, Fish, and Vegetation Discipline Report, for discussion of the project's effects during construction.

S-002-011

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final

EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS.

S-002-012

Water quality treatment for shallow dewatering could consist of storing the water to allow particles to settle or adding chemical flocculants (chemicals that promote flocculation by causing colloids and other suspended particles in liquids to clump together into a mass, called a floc) to reduce suspended particles before the water is discharged from the project area. Any water with contaminant concentrations that reach the contaminant thresholds would have to be treated to the acceptable standards of the King County Wastewater Discharge Permit or Authorization before being discharged to the combined sewer system, or it would need to be disposed of at an approved off-site hazardous waste facility.

S-002-013

The fire suppression system will not use aqueous film-forming foam (AFFF), as described in the Draft EIS. Water that will be used in the tunnel fire suppression system, for both emergencies and system testing will be discharged to the combined sewer system as described in Appendix O, Surface Water Discipline Report, of the Final EIS.

S-002-014

The project is no longer considering the development of a mitigation site because, after the refinement of the project alternatives, the project effects are not such to warrant that level of compensatory mitigation. Proposed mitigation measures are discussed in Chapter 8 of the Final EIS and in Appendix N, Wildlife, Fish, and Vegetation Discipline Report.

S-002-015

The lead agencies appreciate WDFW's participation and

coordination over the course of this project, which has evolved since 2004. Construction methods and mitigation measures have been refined, and the Bored Tunnel Alternative has been identified as the preferred alternative. This alternative does not require in-water work or other activities that would require approval from WDFW. Please see the Final EIS for current information.



May 21, 2004

Allison Ray, Environmental Coordinator
WSDOT – Alaskan Way Viaduct
WSDOT mailstop NB82-230
999 Third Avenue, Suite 2424
Seattle, WA 98104

Subject: Alaskan Way Viaduct and Seawall Replacement Project - Comments

Dear Allison,

S-003-001

Thank you for the opportunity to review the Washington State Department of Transportation's SR-99 Alaskan Way Viaduct and Seawall Replacement Project Draft Environmental Impact Statement. Portions of the project appear to be located on state-owned aquatic lands. As the proprietary manager of the submerged lands and biological communities affected by the project alternatives, we reserve the right to comment on any and all future permits.

In making specific comments on the proposal, it is helpful to understand the land management role of the Washington State Department of Natural Resources (DNR):

The DNR's management authority derives from the State's Constitution (Articles XV, XVII, XXVII), Revised Code (RCW 79.01, 79.90 to 79.100) and Administrative Code (WAC 332-30). As proprietary manager of state-owned aquatic lands, the DNR has been directed to manage the lands "...for the benefit of the public." in a manner that provides "...a balance of public benefits¹ for all citizens of the state..." that includes:

- (1) Encouraging direct public use and access;
- (2) Fostering water-dependant uses²;
- (3) Ensuring environmental protection; and
- (4) Utilizing renewable resources." (RCW 79.90.455).

In these ways, the DNR is responsible for making land use decisions on state owned aquatic lands (SOAL).

¹ WAC 332-30-106 defines public benefit as "...that all of the citizens of the state may derive a direct benefit from departmental actions..."

² Water dependent uses are those uses that "...cannot logically exist in any location but on the water." Examples include water-borne commerce; terminals; watercraft construction, repair or maintenance; moorage; aquaculture; and log booming. (RCW 79.90.465)

S-003-001

Thank you for providing specific information regarding the land management role of the Washington State Department of Natural Resources (DNR).

Allison Ray
May 21, 2004
Page 2

In the specific case of the viaduct/seawall proposal:

S-003-002

- The DNR needs to consider the various proposed uses on SOAL and, where appropriate, grant leases, easements or other land use licenses to the proponent(s). Rental values and/or other compensatory values (such as mitigation) would be charged in consideration for the proposed uses.
- Any authorization(s) (including authorization of mitigation occurring on SOAL) and/or values charged for land use would be assessed in a separate, proprietary decision-making process (that is, separate from the environmental impact assessment process). This is an important distinction, in that, easements and leases for the use of SOAL need to be considered in a process very similar to acquiring property/easement rights across any other lands.

As soon as a preferred alternative for the use of SOAL is determined, an application for the use of SOAL can be filed through our South Puget Sound Region office in Enumclaw (950 Farman Ave. N., Enumclaw, WA 98022). Please contact the office at (360) 825-1631 (Aquatics Section) to obtain an application.

This concludes the department's comments at this time. Please include this office for future comment. Again, thank you for the opportunity to comment on this proposal.

Sincerely,



Rex Thompson, District Manager
Shoreline District Aquatics Region

c: Hugo Flores
Sharon Holley
Dave Kiehle
Mark Mauren
Fran McNair
Loren Stern

S-003-002

After the 2004 Draft EIS was published, your comments along with others led to additional planning, analysis, and the revised alternatives presented in the 2006 Supplemental Draft EIS. Following publication of the 2006 Supplemental Draft EIS, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2004 Draft and 2006 Supplemental Draft EISs, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to identify the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront.

After the selection of the preferred alternative, the lead agencies will coordinate with DNR and apply for any necessary authorizations.

S-004-001

Comment – 5/26/04

Hello this is state representative Mary Lou Dickerson and I am making a formal comment on the EIS and it is that I strongly prefer either the aerial version or the rebuild version and here are my reasons. First, because these are less expensive versions. Also, because they allow for the continued views by the people who travel the viaduct of the most spectacular scenery I think in the Northwest and those views would be lost if we went to a tunnel version. The third reason and probably the most important for me is the access. I want to assure that we have portals to the north so that our people in Ballard can easily drive including the people how are part of our marine industry who drive trucks, who as I understand it would not be allowed to drive in the tunnel. This is critical. So those are the reasons and you can call me at 206-782-6129 if you would like to have further conversations. Again, its price, view and accessibility for my constituents in the north end. Thank you.

S-004-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Rebuild and Aerial Alternatives. After studying several retrofitting concepts, the lead agencies found that rebuilding the viaduct would not be a cost-effective, long-term solution that adequately addresses the risks to public safety and the weakened state of the viaduct. Elements of the Rebuild and Aerial Alternatives were incorporated into the Elevated Structure Alternative, which was analyzed in the 2006 Supplemental Draft EIS and the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

The views of Elliott Bay, Puget Sound, and the Olympic Mountains are prized by many. Views are currently enjoyed by motorists and passengers traveling on the upper deck of the existing viaduct. However, the views for motorists and pedestrians using downtown streets in the vicinity of the waterfront are interrupted by the existing viaduct structure. This structure is considered by some to be a substantial visual intrusion as well as a source of noise and shadow for the Pioneer Square Historic District and the Central Waterfront. Impacts to views are discussed in the Final EIS and considered in detail in Appendix D, Visual Quality Discipline Report.

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. The Bored Tunnel Alternative does not include the connection between Alaskan Way and Elliott and Western Avenues. These would be constructed as a separate project.



STATE OF WASHINGTON

Office of Archaeology and Historic Preservation

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
(Mailing Address) PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 Fax Number (360) 586-3067

RECEIVED
AUG 03 2004
AWVSP Team Office

July 30, 2004

Ms. Allison Ray
Urban Corridors
Washington State Department of Transportation
999 Third Avenue, Suite 2424
Seattle, WA 98104

In future correspondence please refer to:
Log: 020303-02-WSDOT
Property: Alaska Way Viaduct
Re: Draft EIS Comments

Dear Ms. Ray:

Thank you for contacting the Washington State Office of Archaeology and Historic Preservation (OAHP). The above referenced project has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication. Review comments from the Washington State Office of Archaeology and Historic Preservation have been requested regarding historic resources. I have received and reviewed the Draft Environmental Impact Statement for the Alaska Way Viaduct. My specific comments are listed below:

Draft EIS

- S-005-001** • The format of the DEIS makes it difficult to find the sections relevant to Section 106 in the text of the DEIS. The table of contents also does not provide much help in finding the discussions on cultural resources.
- S-005-002** • Page 148, Question 12: this section states that before demolition begins, the closest buildings will be evaluated to determine their vulnerability to damage from construction activities. I recommend also performing surveys on known historic structures further away from the work site that are fragile or vulnerable to construction activities and vibration.

Appendix L, Historic Resources Technical Memorandum

- S-005-003** • Exhibits 2-2, 2-3, and 2-4 are confusing with the differentiation between Landmark eligible (blue) and National Register and/or City Landmark (tan). According to Exhibit A-1, all of the buildings colored blue (landmark eligible), are eligible for the National Register. It would be helpful to have Exhibits 2-2, 2-3, and 2-4 use a different scheme for showing the different historic resources. Perhaps a shaded area for the historic districts, a color for the National Register eligible or listed structures, and another color for local historic structures. Make sure that the way buildings are

ADMINISTERED BY DEPARTMENT OF COMMUNITY, TRADE & ECONOMIC DEVELOPMENT

S-005-001

We hope you found the technical index on page 161 of the Draft EIS, page 134 of the 2006 Supplemental Draft EIS, and pages 256-257 of the 2010 Supplemental Draft EIS helpful for referencing the Historic Resources and Archaeological and Cultural Resources sections. The Draft Section 4(f) Evaluation included in the 2006 Supplemental Draft EIS (pages 116-121) and 2010 Supplemental Draft EIS (pages 224-244) also provide a discussion of Section 106. Please see the Final EIS for current project information, including a technical index and the Final Section 4(f) Evaluation.

S-005-002

Comment noted. Surveys were performed on historic buildings within the project's APE. Any damage to historic buildings or areaways that occurs during construction would be repaired.

See Final EIS Appendix I, Historic, Cultural, and Archaeological Resources Discipline Report, for more information about potential construction effects on historic resources and the proposed mitigation measures.

S-005-003

The exhibits have been reformatted for increased clarity.

- S-005-003** | labeled in Exhibits 2-2, 2-3, and 2-4 are consistent with the eligibility determinations in Exhibit A-1.
- S-005-004** | • More information is needed than is provided in Appendix L for the buildings and structures that will be demolished, moved, or altered to help with the effect determination and MOA processes. Inventories for all resources studied as part of the DEIS need to be provided to OAHP in an electronic format.
- S-005-005** | • In Chapter 8 of Appendix L, Operational Mitigation, the surface alternative has a mitigation measure to monitor buildings and areaways for vibrations impacts. However, none of the other alternatives proposes this mitigation. Vibration monitoring should be included as a mitigation measure in all alternatives, particularly since several of the other alternatives will require pile driving, which will create vibration impacts. Or it may be more appropriate to put this discussion in Chapter 9, Construction Mitigation.
- S-005-006** | • Appendix L references other appendices for more detailed information on project impacts. These other appendices do not analyze the project impacts from a perspective of quantifying the level of effects on historic resources. Either Appendix L needs to take the information in the other appendices and use it fully quantify project impacts, or the other Appendices need to have a section dedicated to how those topic can cause impacts to historic resources.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,



Russell Holter
Project Compliance Reviewer
(360) 586-3533
russellh@cted.wa.gov

S-005-004

Inventory forms have been provided electronically, along with the additional information needed.

S-005-005

Vibration monitoring is included as part of construction mitigation for all the build alternatives.

S-005-006

The various relevant appendices have been coordinated to indicate more clearly the impacts on historic resources.

Alaskan Way Viaduct and Seawall Replacement Project

Department of Ecology, September 22, 2006

Comments on the Supplemental Draft Environmental Impact Statement (July, 2006)

Stormwater and Water Quality Impacts

The following comments were developed by Eric Luengo, Ecology's Transportation Stormwater Engineer for the Liaison Team:

- S-006-001** | 1) *Page 70 of the SDEIS second paragraph:* Indicates that impervious surface would not increase but existing impervious surface would be replaced. Does the project team expect that, based on the amount of replaced impervious surface, the threshold would be met or exceeded causing the minimum requirements to be applied to both new and replaced impervious surfaces?
- S-006-002** | 2) The continuous runoff models when used to design detention facilities to meet the flow duration standard are designed to prevent stream degradation such as channel scour, stream bank instability, and high sediment transport rates. How are the detention systems (specifically the controlling outflow rate component of the system) going to be designed or feasible outflow rates going to be determined to ensure that peak flows or high flow events do not lead to more frequent or higher volume combined sewer overflows? What kind of variances from the Seattle Ordinance Detention Requirements will be used?
- S-006-003** | 3) What type of BMPs are being implemented in the basins that drain to impaired water bodies, more specifically to address fecal coliform, which is a pollutant of concern in the listed water body Lake Union?
- S-006-004** | 4) What measures will be put in place during construction to ensure that sediment that is accumulated or created from the tunneling process (if this alternative is selected) will not end up in stormwater runoff?
- S-006-005** | 5) Does the project team anticipate any problems with relocating the Whatcom Rail yard (located in the southern portion of the project area)? Can there be assurance that the 14 acres of impervious area will be replaced as a result of this relocation (if the corresponding alternative is selected)?
- S-006-006** | 6) If the treatment efficiency decreases with increased flow to the West Point Sewer Treatment Plant (WPSTP), what kind of improvements might be proposed

S-006-001

As described in Appendix O, Surface Water Discipline Report, of the Final EIS, stormwater will be managed in accordance with the applicable stormwater management regulations. The overall land-disturbing activity is expected to exceed the threshold of 7,000 square feet; therefore, Minimum Requirements #1 through #4 of the WSDOT Highway Runoff Manual would likely apply to both the new and replaced impervious surfaces. The remaining Minimum Requirements depend on the amount of new impervious surface that would be created. Calculations regarding the amount of new impervious surface will be made later in the project during the permitting phase, when more design information is available. At that time, the project team will identify additional Minimum Requirements that would apply.

S-006-002

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS. The proposed stormwater management approach is based on a presumptive approach to compliance using the WSDOT and City of Seattle Stormwater Manuals. To the extent possible this approach does not change sub-basin areas or the volume of water discharged to the combined sewer system.

S-006-003

Stormwater will be managed in accordance with the applicable stormwater management regulations as described in the Final EIS. Specific BMPs will be identified during the design phase of the project. Mitigation measures are described in Chapter 8 of the Final EIS.

S-006-006

at the treatment plant to mitigate for the increased flows that will be generated as a result of the construction of this project?

7) If the pollutant removal efficiency is the greatest when implementing BMPs rather than conveying additional flows to the WPSTP, where the pollutant removal efficiency can decrease as a result of increased flows, has the project team considered using only BMPs in the north end of the project area to avoid possible higher pollutant loading into the receiving water bodies in the project area?

8) The Water Resources Discipline report indicates that there will be more areas draining into the combined sewer system in the tunnel alternative in comparison to the rebuild alternative. Does that mean that areas that were once on separate, or converted to separate, sewer systems are being converted to combined? If this is the case, why is the project team choosing to add additional flow to the combined sewer system if the capacity of the Elliot Bay Interceptor has already reached its capacity? This could open the door for more possible combined sewer overflow events and reduce the overall pollutant removal efficiency of the WPSTP.

Ed Abbasi, the lead stormwater engineer at the Ecology Northwest Regional Office, also expressed his concerns that stormwater generated within the project area that was previously separated from the combined sewer system should not be reintroduced back into the combined sewer system. The following are his comments in regards to this issue:

According to the supplemental DEIS, apparently the revised project is increasing the drainage area that would result in an increase of CSO discharges into Elliot Bay, and it seems the City of Seattle has plans to provide a treatment system for the expected CSO generated as a result of increased impervious areas. This is from the report:

In August 2005, SPU produced a technical planning study, "Drainage and Wastewater Feasibility Study for the Alaskan Way Viaduct/Seawall Final Report" (Seattle 2005b). The study considered permanent replacements of the combined sewer and stormwater utilities along the Seattle waterfront, between S. Royal Brougham Way and Bay Street. The feasibility study included a planning level hydraulic analysis of the combined sewer system that tied the project area (approximately 90 acres) to the upstream area tributary to the major sewer interceptor (approximately 2,000 acres). The study identified that additional untreated combined sewer outfall (CSO) discharges were potentially occurring along the waterfront. The study recommended a combined sewer system treatment facility and associated conveyance and detention as the best apparent alternative.

What if the City decides not to proceed with the recommendation? Is it not the project's responsibility to treat the generated runoff rather than depend on the

S-006-004

Handling of tunnel spoils will be addressed through the development and implementation of management plans and the selection and implementation of appropriate construction BMPs. Details of mitigation for potential construction-related effects, including those from surface water exposure to tunnel spoils, are discussed in the Final EIS Appendix O, Surface Water Discipline Report, Chapter 6.

S-006-005

The Whatcom Railyard will not be relocated by the Alaskan Way Viaduct Replacement Project. Please see the Final EIS for a description of the current alternatives.

S-006-006

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS. To the extent possible, this stormwater management approach does not change sub-basin boundaries or receiving waters or cause increase in the volume of stormwater discharged to the combined sewer system.

S-006-006

City? Where is the project commitment and discussion of this issue? Additionally how about the question Ecology raised earlier during 2004 DEIS. The federal law prohibits discharge of stormwater to a separate sanitary system. It is technically against the federal law and it is Ecology's strong recommendation that any stormwater previously separated from the system should not be reintroduced into it. Ecology made this comment last time and is making it again this time. WSDOT must address this issue and provide a full discussion. The SDEIS has not done an adequate job in this regard.



Peter Steinbrueck
Seattle City Councilmember

RECEIVED
JUN 07 2004
AWWSP Team Office

May 31, 2004

Ms. Allison Ray
Alaskan Way Viaduct and
Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

RE: Alaskan Way Viaduct and Seawall Replacement Project
Draft Environmental Impact Statement Response

Dear Viaduct and Seawall Replacement Project Team,

Thank you for the opportunity to respond to the Alaskan Way Viaduct and Seawall Replacement Project Draft Environmental Impact Statement. As a member of the project's Leadership Group, I am excited to see this project moving forward.

L-001-001

As such, I urge you to include a "Sixth Alternative" in your EIS process. This sixth alternative would study whether a "no highway/improved transportation grid" option would be viable for our region in terms of this project. Below are some reasons as to why studying this option is important:

The Viaduct and Seawall Draft EIS is insufficient.

While there are currently five options included in the Draft EIS, the scope of the transportation project is remains narrowly defined. The Draft EIS only analyzes solutions that replace current capacity with a new highway in the same corridor. This limited scope precludes study of an alternative that may be considerably less expensive, simpler, and less disruptive, and that offers Seattle the opportunity to reconnect to the waterfront. An alternative that makes improvements to the larger transportation system -- arterial connections, transit, the express lanes and entrances and exits on I-5, freight corridors, and the downtown grid -- while keeping Alaskan Way as a typical 4 lane surface street should be analyzed concurrently in a supplemental EIS.

This alternative would define the optimal set of improvements to existing resources so they can accommodate Viaduct freight and vehicle traffic, away from the waterfront. It would also include fixes to the street grid north of the Battery Street tunnel to redistribute traffic, both north/south and east/west. The Seattle Department of Transportation's Central City Access Strategy and the People's Waterfront Coalition

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L-001-001

The alternatives evaluated in the Draft EIS represented a reasonable range of approaches that met the basic purpose of the project: "to provide a transportation facility and seawall with improved earthquake resistance that maintains or improves mobility and accessibility for people and goods along the existing Alaskan Way Viaduct Corridor." Subsequently, considerable effort has gone into further planning and development of other alternatives, leading to the current purpose and need statement and alternatives considered in the Final EIS.

The Final EIS Chapter 1, Introduction, describes the history of the project, including development of the Purpose and Need and alternatives. This chapter also addresses development of the I-5, Surface, and Transit Hybrid, and subsequent 2009 recommendation by Governor Gregoire, former King County Executive Sims, and former Mayor Nickels to replace the central waterfront portion of the Alaskan Way Viaduct and Seawall with a single, large-diameter bored tunnel. Please refer to the Final EIS for current information.

L-001-001 | Proposal (www.peopleswaterfront.org) offer a beginning framework that should then be developed into a comparable alternative.

L-001-002 | **The Draft EIS is premature because Seattle has not yet decided to replace the Viaduct.**

A waterfront planning process is currently underway, guiding the citizens and the City of Seattle in defining the long-term future for Seattle's newly freed waterfront. Citizens have begun to recognize the scale of this opportunity for Seattle to reconnect to the water, and are envisioning parks, beaches, water-based recreation, and pedestrian primacy. The citizens of Seattle have not yet concluded that a new highway is the most appropriate use of precious waterfront lands.

For these reasons, I urge you to study this alternative, otherwise we will not know the pros and cons of such an alternative that could very well have positive impacts on our city.

Thank you for your consideration of including a "no highway/improved transportation grid" option to be studied in the EIS. Feel free to contact me with any questions or comments at peter.steinbrueck@seattle.gov or via phone at (206) 684-8572.

Sincerely,



Peter Steinbrueck AIA
Seattle City Council

L-001-002

The Final EIS Chapter 1, Introduction, describes the history of the project, including development of the Purpose and Need and alternatives. This chapter also discusses the 2009 recommendation by Governor Gregoire, former King County Executive Sims, and former Mayor Nickels to replace the central waterfront portion of the Alaskan Way Viaduct and Seawall with a single, large-diameter bored tunnel. Please refer to the Final EIS for current information.

The City of Seattle is leading redevelopment efforts and associated environmental reviews processes for the central waterfront, which would take place under NEPA and/or SEPA as appropriate. In addition, the project compliments a number of other projects with independent utility that would provide other improvements such as transit enhancements and a new Alaskan Way Promenade and public space. These individual projects include the Moving Forward projects identified in 2007, as well as improvements recommended as part of the Partnership Process. Please refer to Chapter 2, Alternatives Development, of the Final EIS for a description of these projects.



Richard Conlin
Seattle City Councilmember

WSDOT
Attn: Allison Ray
999 Third Ave S., Suite 2424
Seattle WA 98104

June 1, 2004

Dear Ms. Ray,

I am writing to comment on the Alaskan Way Viaduct Draft Environmental Impact Statement (DEIS) from my perspective as chair of the Seattle City Council's Transportation Committee. My comments will cover the DEIS in general, address certain specific issues in regard to specific alternatives, and highlight areas where further analysis should be included for the final EIS.

RECEIVED
JUN 01 2004
AW/SP Team Office

L-002-001

DEIS In General

A central issue of concern is the failure of the DEIS to cover a broad enough area of the City. The Alaskan Way Viaduct project is required not because of traffic congestion or transportation bottlenecks on the current facility, but because it is not safe. For this reason, the goal of the project should be to provide safe transportation alternatives, in an economical and environmentally sound manner.

The current corridor is located on fill and is inherently unstable. Changing traffic patterns to direct a greater share of traffic into areas of the city that are more seismically stable can be less costly, minimize risk, and offer alternatives in the event of roadway failure in the near future.

All of these considerations suggest that a broad corridor should be investigated, including not merely the existing facility but the entire downtown area as far east as I-5, to allow consideration of options that can divert traffic from the current facility. Such options will be necessary in any event to mitigate impacts during the exceptionally long and intense construction periods that any of the alternatives require.

L-002-002

Seattle's Center City Access Strategy, investment in transit, movement of traffic to other routes, and upgrading of other downtown Seattle road corridors must be considered as part of this DEIS.

L-002-003

It is to be noted that the Purpose and Need Statement explicitly does not reference capacity requirements for the current facility corridor, but rather states that the purpose of this proposed action is:

"...to provide a transportation facility and seawall with improved earthquake resistance that maintains or improves mobility and accessibility for people and goods along the existing Alaskan Way Viaduct Corridor." (emphasis added)

This statement should be interpreted broadly as a mandate for creative thinking about transportation alternatives, including transit options and expanding the corridor to examine other alternatives that might involve I-5 or downtown arterials.

L-002-001

The project's purpose, as agreed jointly by the three lead agencies, includes maintaining or improving mobility, accessibility, and traffic safety for people and goods along the existing Alaskan Way Viaduct corridor. To the extent improvements east of SR 99 can help meet this goal, they are relevant and have been included in project planning and analysis.

L-002-002

This study has been incorporated into project planning, especially for means to alleviate construction impacts.

L-002-003

The purpose and need statement has been updated since the publication in 2004. Please refer to the Chapter 1 of the Final EIS for the updated version.

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L-002-004

The DEIS only covers impacts up to Second Avenue, and fails to consider the real corridor moving traffic to and through downtown. The DEIS assumes choices on the north and south end, without analyzing a full range of alternatives or their impacts. If the DEIS is to cover this elongated stretch of corridor from Lake Union to Spokane Street, and is to address traffic that flows from multiple sources approaching the existing facility (i.e., westbound Mercer traffic, eastbound West Seattle traffic, southbound Interbay traffic), it should not be confined to the narrow pinch point defined by the current structure. Rather, it should include all of downtown and other options such as modifying I-5. If the intent is to narrowly address current facility replacement, it should be broken into at least 3 EIS's for the three segments.

L-002-005

Further, the final EIS needs to fully evaluate the options to the north and south, and include analysis of each option compared to other similar options (for example, the widened Mercer versus the lowered Aurora versus the no action alternative). For instance, while it is mentioned briefly in the aerial alternative, there is no analysis of the covered Aurora plan. Also, the DEIS does not spell out which options to the north and south will work with the five different central corridor alternatives. Whether each option can be used with each alternative is unclear, and needs to be specified for decision makers and the public.

Alternatives

L-002-006

Surface Alternative: The surface alternative appears designed for failure. The poor design and engineering approach to this alternative is wholly inadequate, and other and more promising designs must be explored to provide an objective and appropriate analysis of a surface option. This alternative should be refined further to consider how to make the option viable. Examples could include making it a limited access roadway, with minimal intersections through downtown; or developing serious alternatives for deploying passengers and freight to other modes and facilities, and retaining a 4-lane configuration on the surface. The analysis projects a major problem with the S. Spokane to downtown segment, but provides no options that might address this problem. Please indicate options that might be employed to change this outcome.

The analysis projects an increase from 8 to 14 congested intersections in the surface alternative on Western, First, and Second. Please provide an analysis that includes the impacts on Third, Fourth, and Fifth avenues including assumptions for transit priority for all alternatives.

There is an overpass at Seneca Street included in the surface option, but no reason is given, and no impacts are assessed. This needs to be addressed in the final EIS.

L-002-007

Tunnel Bypass: The DEIS must present data on the capacity assumed for a lane of traffic for limited access and surface arterial. If traffic flows as well as projected in the bypass tunnel option, the DEIS must explain adequately why 6 lanes are required on the surface in this alternative. The DEIS should present other access options for the tunnel that could prevent the necessity to have 6 surface lanes. Please analyze the bypass tunnel option in conjunction with a four lane surface alternative.

Tunnel/Tunnel Bypass: Since access to downtown is not provided in the tunnel options, the DEIS should present more clearly the impacts on surface streets north and south of downtown. The DEIS should clearly explain that the tunnel alternative includes an aerial structure in front of the Pike Place Market, descending from the Bell Street tunnel until it dives into a tunnel in the middle of the waterfront. A true tunnel alternative should also be developed that either fully lids or creates a complete tunnel system. If a truly complete tunnel alternative requires the reconstruction of the Bell Street tunnel, thereby triggering much greater costs than the semi-tunnel proposed in this DEIS, that should be clearly explained.

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L-002-004

The purpose and need of the project specifically addresses the transportation functions of the Alaskan Way corridor, which includes SR 99 and the Alaskan Way surface street. Modifying I-5 or downtown Seattle is not within the defined scope of the project. The Partnership Process, in which Seattle had a lead role, considered potential improvements to I-5.

L-002-005

The Final EIS Chapter 1, Introduction, describes the history of the project, including development of the Purpose and Need and alternatives. This chapter also discusses the 2009 recommendation by Governor Gregoire, former King County Executive Sims, and former Mayor Nickels to replace the central waterfront portion of the Alaskan Way Viaduct and Seawall with a single, large-diameter bored tunnel. Please refer to the Final EIS for current information. Several alternatives and options mentioned in this comment are no longer under consideration.

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the other two alternatives. Extended closure of SR 99 would have severe adverse effects on Seattle. Chapters 5, Permanent Effects, and 6, Construction Effects in the Final EIS provides a more in-depth comparison of tradeoffs for the three alternatives.

L-002-006

The Final EIS Chapter 2, Alternatives Development, describes the environmental documentation and alternatives analysis that occurred

L-002-008 Further Analysis for Final EIS

There are crucial omissions of analysis from the DEIS that need to be included in the final EIS. These include further analysis of construction impacts; the time value of congestion and other economic impacts during the construction period; modeling of what happens if the viaduct is torn down and not replaced; further information on traffic speed improvements; providing specific ranges for outcomes from the data models used to make choices; an assessment of the uncertainties that might influence the cost of the project; and the use of tolls to finance the project.

- L-002-009**
- The construction options all assume doing the work while the viaduct is operating. For the final EIS, you should consider an option where the viaduct is shut down for the length of construction, and assess the impacts for traffic in and around downtown. These should then be evaluated in the context of reduced construction time and resultant impacts.

- L-002-010**
- A crucial omission from the DEIS is the time value of congestion and other economic impacts during the 7.5 to 11 years of 24 hour construction. By choosing 2030, well after the completion date, as the criteria for evaluating the project, the years of costs and impacts are ignored. This is like ignoring the time value of money, for which a discount rate is always assigned in valid economic studies. Please provide a dynamic model of the congestion and economic impacts of the construction period, and assign an appropriate discount rate to measure the no action alternative against.

- L-002-011**
- The modeling included in the Final EIS should include data on what happens under scenario 2 of the no action alternative including analysis of arterials and I-5 if the Viaduct is torn down and not replaced. It is essential to model this alternative for two reasons: 1) it is possible that resources may not be found for any of the alternatives modeled, and we should know the impacts of this situation; and 2) there are some constituencies who have considerable skepticism regarding the need for the viaduct, some who believe it does not require replacing because it can work adequately, and others who believe that it is a transportation function that can be substituted for.

- L-002-012**
- An analysis of economic impacts of the alternatives and options should be included in the final EIS. This would also include an analysis of the construction impacts to businesses along the waterfront and in the north and south segments for the different construction options. The impact of construction is potentially catastrophic from an economic standpoint, and must be fully understood. The difference in construction time among the alternatives does not appear to be credible, and must be elucidated more clearly.

- L-002-013**
- In the DEIS, traffic speed improvements in several options are attributed to "closing difficult ramp connections and improving interchanges." Please indicate the impact of these actions on traffic in and out of downtown. Provide data on what proportion of traffic is assumed to be going in and out of downtown as opposed to through downtown.

- L-002-014**
- The data used to evaluate options is based on modeling for 2030 outcomes. Data regarding real impacts and choices that were made during the temporary closures of the Viaduct for repairs are not referenced, yet this data would have provided an excellent context within which to evaluate traffic impacts of various alternatives. Relying on a 2030 model to determine impacts requires that the model be validated. Please indicate how this model was validated.

Also displaying point outcomes rather than ranges gives an illusion of precision, when in fact there are ranges of possible outcomes. Please articulate the ranges that were generated as the actual outcomes from the model. If there were not ranges, the model has little or no

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prior to the 2010 Supplemental Draft EIS. The 2004 Draft EIS included evaluation of the Surface Alternative. However, this alternative was eliminated because it reduced roadway capacity and didn't meet the project's purpose as identified in the 2004 Draft EIS.

L-002-007

The Bored Tunnel Alternative, Cut-and-Cover Tunnel Alternative, and Elevated Structure Alternative have been analyzed for the Final EIS. The Bypass Tunnel Alternative is no longer under consideration and was not evaluated in the Final EIS. The Final EIS describes the travel demand and traffic patterns for the build alternatives. The Cut-and-Cover Tunnel Alternative presented in the Final EIS includes a proposed lid covering SR 99 between the waterfront tunnel and the Battery Street Tunnel.

L-002-008

The Supplemental Draft EISs and Final EIS address all of these issues.

L-002-009

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and

L-002-014

validity. Please provide outcomes based on a range of inputs. In addition, such a model must have a series of variables, which have sensitivities and uncertainties associated with them. Please review these sensitivities and key uncertainties that might influence the outcomes of the modeling.

L-002-015

- The analysis does not consider the price elasticity of demand if tolls were used to finance the project. Please provide this.

L-002-016

- The analysis assumption about a mode split for transit needs further study. It does not analyze how that transit operates or is prioritized in the Alaskan Way viaduct corridor and on downtown streets. As a result there is not a basis of information to compare alternatives in addressing the multi-modal aspects of the project.

L-002-017

Finally, the alternatives assume replacing a current facility that is used below its capacity with a level of efficiency and capacity that greatly exceeds current or future use projections. Given the very high demand for transportation funding for a myriad of other projects in the Seattle area, investing this level of resources in this corridor must be assessed against other priorities. Ensuring the current free flow of traffic on State Route 99 in 2030 may preclude easing congestion on Interstate 5, State Route 520, other key corridors, or investing in transit that can mitigate traffic on several corridors. This may be a luxury that the region cannot afford. Therefore, this DEIS must explore alternatives that are clearly affordable and can be combined with other system improvements to have the most positive impacts on the overall transportation system.

Thank you for your consideration of these comments. I look forward to working with the Viaduct Team as this project moves forward.

Sincerely,

Councilmember Richard Conlin
Chair, Transportation Committee

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Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

L-002-010

Economic impacts associated with increases in congestion, and the associated costs of congestion during construction, are discussed qualitatively in the Final EIS and in Appendix L, Economics Discipline Report. The ability to calculate an appropriate discount rate is limited by the available data generated by the transportation models. In general, the delay due to construction is on the order of minutes.

L-002-011

The Final EIS Chapter 1, Introduction, describes the history of the project, including development of the Purpose and Need and alternatives. This chapter also addresses development of the I-5, Surface, and Transit Hybrid, and subsequent 2009 recommendation by Governor Gregoire, former King County Executive Sims, and former Mayor Nickels to replace the central waterfront portion of the Alaskan Way Viaduct and Seawall with a single, large-diameter bored tunnel. The Surface Alternative was seriously considered during the Partnership Process, but was rejected because the lead agencies determined it lacked the capacity to serve the long-term needs of the region and does not meet the project's purpose and need to provide capacity to and through downtown Seattle. Please refer to the Final EIS for current information.

L-002-012

The in-depth discussion of economic effects is provided in Appendix L, Economics Discipline Report of the Final EIS. Construction would inconvenience or disturb businesses and customers adjacent to the project area, including the central waterfront. Construction related effects

would vary considerably over time and area. Mitigation measures would be in place to minimize or avoid economic impacts to businesses, as describe in Chapter 8, Mitigation of the Final EIS.

L-002-013

Final EIS Appendix C, Transportation Discipline Report, provides more complete information about impacts associated with the on- and off-ramps. Traffic forecasts for the corridor, including through trips and trips destined for downtown are also provided.

L-002-014

Very little reliable data documenting the traffic conditions experienced after the temporary closure of the Alaskan Way Viaduct is available. The model was validated using proven travel demand modeling procedures, and these procedures were confirmed by WSDOT and SDOT. Use of a single number for displaying forecast information, and reflected in the proper context, is reasonable as long as the reader understands that forecasts should not be interpreted as precise. Updated data reflecting a range of impacts (where appropriate) is provided in the Final EIS Appendix C, Transportation Discipline Report.

L-002-015

A detailed tolling analysis has been conducted for all alternatives and is described in the Final EIS. Please refer to Appendix C, Transportation Discipline Report, for additional detailed analysis of tolling impacts to transportation elements. Legislative action is required to toll this facility. The potential effects of tolling are evaluated and documented so that the project has considered potential effects if the Washington State Legislature decides to use tolling to fund a portion of the project.

L-002-016

The mode split information has been updated and reflected in the Final

EIS Appendix C, Transportation Discipline Report. The travel demand modeling analysis reflects existing and future transit operating conditions and the routes the transit agencies operate, including those that operate on SR 99. Future transit service is based on transit agency service development plans and the PSRC Metropolitan Transportation Plan, which are not components of this project.

L-002-017

Your comments are noted. Transportation modeling, based on Seattle's land use plans and growth projections, shows a growing demand for this portion of SR 99 and not an excess of capacity. Please see the Final EIS for current information about the proposed build alternatives for this project.



City of Seattle
Seattle Planning Commission

Marty Curry, Executive Director
Gregory J. Nickels, Mayor

City of Seattle
Seattle Design Commission

Vacant, Executive Director
Gregory J. Nickels, Mayor

June 1, 2004

Alison Ray
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104

RECEIVED
JUN 18 2004
AWVSP Team Office

Dear Ms. Ray:

The Seattle Planning Commission and the Seattle Design Commission appreciate the opportunity to share the results of their combined review and comments on the SR 99: Alaskan Way Viaduct & Seawall Replacement Project Draft Environmental Impact Statement (DEIS).

Many of our comments are grounded in the project principles we developed in October, 2001 and shared with both City and State officials (see attached). We believe that the DEIS is an important opportunity to inform the project team about matters of utmost importance to the two Commissions as this project moves forward, as well as comment more specifically on the adequacy and content of the DEIS document.

The Commissions recognize the important role of the EIS process. It describes in detail the alternative options and identifies all potential impacts; identifies the best possible ways to mitigate these impacts; and gives the public the opportunity to weigh in on the document. It is likely to be the most important tool used to identify the preferred alternative which will be selected later this summer. The Final EIS is also critical as it will become the blueprint for Washington State Department of Transportation, the City, and the community as the project moves into design and implementation for identifying and determining impact mitigation. This document should also confirm the State's and City's commitment to consistency with all relevant City policies.

L-003-001

We believe the EIS process should describe how decisions will be made about this significant project. Since this is not included in the DEIS, the City and State should clearly articulate this process during the next month as it meets with the Leadership Group and other agencies.

Most fundamentally, we hold the Viaduct to be a transportation project that is and should be a driver for urban and community development. This is truly an example of the inextricable relationship between transportation and land use in shaping an area. Therefore, the decision-making process should be transparent to all stakeholders.

1

L-003-001

Environmental documentation for the project has been prepared in compliance with the National Environmental Policy Act (NEPA)(42 U.S.C. 4322(2)(c)) and the State Environmental Policy Act (SEPA)(Ch. 43.21 C RCW). The Final EIS Chapter 1, Introduction, describes the history of the project, including development of the Purpose and Need and alternatives. The lead agencies have worked extensively with each other, the public, the legislature, and the Governor to align the preferred alternative choice with the available project funding. Chapter 2 of the Final EIS describes the Partnership Process leading to the preferred alternative identification. The Partnership Process began by evaluating eight scenarios or comprehensive solutions to learn what elements worked best together to replace the viaduct.

We understand that members of the public may prefer different ways to share their comments. In order to encourage as much feedback as possible, we provided several options. At the hearings, attendees could submit comments on a written form, on a computer using an electronic form, or verbally to a court reporter. In addition to the meetings, the public could submit comments by mail or e-mail to the project team. The project team often holds open-house style public meetings to provide as much flexibility as possible to the public. With an open-house format, hearing participants are able to come and go to the meetings as their schedules allows, making the meetings more convenient for many people. Please refer to the Final EIS for current information.

Nine Planning Commissioners and four Design Commissioners have participated in reviewing specific sections of the DEIS. Commissioners, who represent a broad spectrum of professional disciplines and most geographic areas of the city, have reviewed the DEIS from their diverse perspectives. The Planning Commission reviewed this document keeping in mind their role as a primary steward of the City's Comprehensive Plan and its Neighborhood Plans. The Design Commission's review reflects its primary responsibility for reviewing aesthetic, environmental and design aspects of City capital improvement projects and projects in the City right-of-way.

Based on this analysis of the DEIS and additional project reviews, each of the two Commissions will also identify key issues that are important for the City to consider in its role in the selection of a preferred alternative this summer. To that end, we would strongly recommend the creation of a consolidated scorecard by which decision makers could compare and assess the alternatives based on the critical aspect, including: transportation benefits, economic benefits, quality of urban environment, and costs.

Below you will find a summary of our comments and overall recommendations, while a more detailed, DEIS Comments Matrix is attached.

Overall Recommendations:

- L-003-002** • **Alternatives –**
The five alternatives and many variations present a complex range of potential solutions, but still miss some reasonable alternatives. While the effort to bracket the broadest range of options possible is admirable, we encourage more study of some lower cost and more common sense solutions, including a reduced traffic capacity option (see the detailed comments on this option). The overall analysis should assess which option best addresses the emergency or default plans if a seismic event were to occur sooner rather than later.
- L-003-003** • **Land Use/Economics –**
The Final EIS should look more in-depth at the economic value inherent in the future use of land that is made available by various alternatives since this will vary widely among the options. The loss of surface parking is a key issue that requires more focused study. The impact on the City and to waterfront businesses, in particular, promises to be profound and should be addressed for all alternatives.
- L-003-004** • **Construction –**
The Commissions have serious concerns about the scale of construction activities with all of the options and the protracted phasing schedule outlined in the DEIS. We urge you to look at more expeditious strategies, and believe the schedule need not be so sequential. We recommend that the project commit to implementing surface improvements early on and identify a point in the project to step back and study how traffic redistribution is working, adjusting future phases accordingly.

L-003-002

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. After the 2004 Draft EIS was published, your comments along with others led to additional planning, analysis, and the revised alternatives presented in the 2006 Supplemental Draft EIS. Following publication of the 2006 Supplemental Draft EIS, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2004 Draft and 2006 Supplemental Draft EISs, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to identify the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront.

L-003-003

Appendix L, Economics Discipline Report, of the Final EIS describes the indirect impacts for future land use in qualitative terms (see the indirect effects section in Chapter 5). Analysis of economic effects on specific parcels not being acquired for new right-of-way would be speculative.

L-003-005

- **Transportation –**
The Final EIS should look at the project in its larger context, considering the need for regional transportation network solutions and for a commitment to not impact other parts of the network.

L-003-006

- **Visual Quality –**
Develop the potential to improve the coherence and connections into the City and views from the City. Strive to repair the gaps in the fabric of downtown.

Again, we appreciate the chance to provide our comments on this project DEIS, recognizing the magnitude of its importance to the community and region. We would be happy to meet with both City of Seattle and Washington State Department of Transportation staff to answer any questions you have or to discuss our comments further.

Sincerely,



David Spiker, Chair
Seattle Design Commission



George Blomberg, Chair
Seattle Planning Commission

Attachments:

1. SPC / SDC Recommended Principles on the Alaskan Way Viaduct and Seawall Abbreviated Version
2. Section by Section Comment Matrix

cc: Secretary Doug McDonald, WSDOT
Mayor Greg Nickels
Seattle City Council
Maureen Sullivan, WSDOT
Tom Madden, WSDOT
Grace Crunican, SDOT
Bob Chandler, SDOT
Steve Pearce, SDOT
Diane Sugimura, DPD
John Rahaim, DPD

The effects would be dependent upon economic forces beyond the control of this project and outside the scope of the Final EIS.

The economic effects of the loss of short-term, on-street parking are quantified in both Chapters 5 and 6 of the Economics Discipline Report. Construction effects on waterfront businesses are evaluated in Chapter 6 for all alternatives.

L-003-004

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

L-003-005

Please see the Final EIS and Appendix C, Transportation Discipline Report, for an updated discussion of transportation effects and proposed mitigation.

L-003-007

Seattle Planning Commission / Seattle Design Commission
Recommended Principles on the Alaskan Way Viaduct and Seawall
Abbreviated Version - June 01, 2004

TRANSPORTATION RELATED PRINCIPLES

Plan within a Broad Context and Address the Diversity of Users

1. **Principle:** *Retain current capacity provided by the Viaduct to move people and goods, but within the broader context of the transportation system that serves and provides access to and through downtown.*
2. **Principle:** *Design the Viaduct project to meet each of the various users' needs, but look broadly at a variety of transportation modes and corridors serving and going through downtown to meet these different needs.*

Provide Improved Connections

3. **Principle:** *Plan and design the new Viaduct to improve at grade connections to the waterfront and other downtown neighborhoods so that it is part of knitting together downtown.*

LAND USE RELATED PRINCIPLES

Support a Broad Vision for the Waterfront and its Connections to Downtown

4. **Principle:** *The final Viaduct design alternative should contribute to the City's long term goals of enhancing access to the waterfront and connections between the waterfront and adjacent downtown neighborhoods.*
5. **Principle:** *Recognize that downtown and the waterfront have increasingly become destinations unto themselves, which represents a significant shift in function and intent since the Viaduct was first constructed as a bypass route to circumvent the City.*

Acknowledge the Viaduct as a prominent element of the Waterfront and Downtown

6. **Principle:** *Ensure that the final design selected for the Viaduct replacement has a positive influence on the character of the area between the waterfront and adjacent neighborhoods/buildings.*

COLLABORATION

Work Collaboratively

7. **Principle:** *The WSDOT and the City of Seattle agreement to collaborate on this project will include a number of related projects and transportation modes, and must result in a multi-faceted approach to meeting the various transportation needs and functions served by the current Viaduct.*

L-003-006

The visual character and quality of the views, as well as the likely viewer response of drivers and passengers, were discussed for each alternative in the 2004 Draft EIS, the 2006 and 2010 Supplemental Draft EISs, and in greater detail in the Final EIS Appendix D, Visual Quality Discipline Report. The Visual Quality Discipline Report analysis considers views in the SR 99 corridor, which is designated as a City of Seattle Scenic Route, and identifies and assesses designated view corridors largely along east-west streets. Views from the roadway and of the roadway are also assessed.

L-003-007

The recommended principles are consistent with the project's purpose and need.

**SR99: Alaskan Way Viaduct and Seawall Replacement Project DEIS
Joint Design Commission and Planning Commission Comments**

SECTION	COMMENT
GENERAL COMMENTS Main Introductory Document (Chapters 1-11)	Overall the introductory document provides a good description of the project need, background and the alternatives. Many of the Commissions' comments relate to clarifying statements and the alternatives and to including more about the larger framework for the project and decision-making process.
L-003-008	The 156-page overview document of the DEIS is thorough, informative, easy to read and understandable, making clear references to other technical memos, as appropriate. It is a beautifully laid out document with superb graphic quality, which we hope will be used as a model and precedent for other major transportation projects. We do, however, question the production cost and whether many important details are accessible to the general public. Our main concern is whether people could easily access all the necessary technical information to adequately assess the impacts of each of the 5 alternatives by reading only the DEIS document itself.
L-003-009	The Commissions have a major concern that the DEIS does not inform the reader of the process for developing the preferred alternative. If the preferred alternative is to be developed prior to or concurrent with the response to DEIS comments in a FEIS, it is critical that the public understands how their comments were reflected in the decision process. It must also be clear what role the three lead agencies and the Leadership Group will have in selecting the preferred alternative. Some general description of the process from this point forward would be helpful for the interested reader and the general public and should be articulated soon.
L-003-010	Chapter 2 serves as the Executive Summary and is well presented. It is a dramatic improvement over typical EIS documents and is directed toward the essence of the task – choosing the best alternative. However, despite the vast amount of interesting data, it is not organized in a way that is very useful in informing a responsible decision. A larger framework for making the decisions around the preferred alternative needs to be added to the Final EIS document, with the data put into a meaningful context for decision makers. Wherever possible there should be

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L-003-008

Thank you for providing support for the EIS layout and documentation approach. The production costs of the EIS was comparable to other EIS documents, despite improvements to the quality of the graphic design and layout. This was made possible by the type of printing process used to produce the document.

The 2004 Draft EIS, 2006 Supplemental Draft EIS, 2010 Supplemental Draft EIS, and the Final EIS provide clear references to technical appendices in an effort to help direct interested readers to detailed information and to make sure the EIS is concise and focuses on relevant issues. The technical appendices are provided to all recipients of the EIS on a CD, making these technical details accessible to the public. Additionally, hard copies of all of the technical appendices are provided at City of Seattle libraries and neighborhood centers to ensure accessibility to the public. This approach is supported by both the National Environmental Policy Act (NEPA) and the State Environmental Policy Act (SEPA) in the following references:

NEPA References:

- 40 CFR 1502.1: Agencies shall focus on significant environmental issues and alternatives and shall reduce paperwork and the accumulation of extraneous background data. Statements shall be concise, clear, and to the point, and shall be supported by evidence that the agency has made the necessary environmental analyses.
- 40 CFR 1502.2: Environmental impact statements shall be analytic rather than encyclopedic.

SEPA References:

- WAC 197-11-400 (3): Environmental impact statements should be

L-003-010	<p>clear context statements added about the meaning and value of the material presented. Within this context the document should explain the absence of any cost benefit analysis since many of the impacts are the same between alternatives and it simply gets down to the economic value of maintaining 'freeway' thru-route capacity vs. cost and open space quality/parks.</p> <p>Additionally, some very fundamental assumptions need to be established and explained. These should be part of the framework for decision-making discussed above and relate to the transportation goals for the project and how these fit into the regional transportation goals and the City's Comprehensive Plan.</p> <p>To address the need for a clear decision-making framework, we suggest a logical decision matrix be developed in which the following issues would be clarified:</p>
L-003-011	<ul style="list-style-type: none"> ▪ The economic value of providing additional SOV capacity for through traffic, both critical and non-critical should be carefully analyzed for its true value and costs. Given local and regional goals to discourage unnecessary SOV trips, this analysis should examine this element of the proposal carefully, particularly with the well-documented "build it and they will come" effect of added road capacity.
L-003-012	<ul style="list-style-type: none"> • Acceptable sizes for streets along the waterfront must be identified. A four lane street (with or without parallel parking) might well be the widest surface street that should run along the waterfront in order to establish the most vibrant, healthy and urbane pedestrian environment which translates in the long run into economic value.
L-003-013	<ul style="list-style-type: none"> • Clarification that the majority of the environmental indicators are essentially the same for the alternatives.
L-003-014	<ul style="list-style-type: none"> • The 7.5 - 11 year construction time frame with its related 4-lane detour will result in extended travel times caused and could permanently change travel patterns and consequently. This reality needs to be assessed in the transportation analysis.
L-003-015	<ul style="list-style-type: none"> • The economic impacts of the 7.5 to 11 year duration of construction on waterfront businesses need to be examined thoroughly. This analysis should include assessment of the total value of these businesses and the maximum time they could sustain the impacts of continuous construction and should also include an appropriate business mitigation plan.
L-003-016	<ul style="list-style-type: none"> • It would be helpful to see the "No Build" alternative as part of the comparisons in Chapter 2.

concise, clear, and to the point, and shall be supported by the necessary environmental analysis. The purpose of an EIS is best served by short documents containing summaries of, or reference to technical data, and by avoiding excessively detailed and overly technical information. The volume of an EIS does not bear on its adequacy. Larger documents may even hinder the decision making process.

- WAC 197-11-420 (6): Agencies shall incorporate material into an EIS by reference to cut down on bulk, if an agency can do so without impeding agency and public review of the action.

L-003-009

Environmental documentation for the project has been prepared in compliance with NEPA (42 U.S.C. 4322(2)(c)) and SEPA (Ch. 43.21 C RCW). The Final EIS Chapter 1, Introduction, describes the history of the project, including development of the Purpose and Need and alternatives. The lead agencies have worked extensively with each other, the public, the legislature, and the Governor to align the preferred alternative choice with the available project funding. Chapter 2 of the Final EIS describes the Partnership Process leading to the preferred alternative identification. The Partnership Process began by evaluating eight scenarios or comprehensive solutions to learn what elements worked best together to replace the viaduct.

We understand that members of the public may prefer different ways to share their comments. In order to encourage as much feedback as possible, we provided several options. At the hearings, attendees could submit comments on a written form, on a computer using an electronic form, or verbally to a court reporter. In addition to the meetings, the public could submit comments by mail or e-mail to the project team. The project team often holds open-house style public meetings to provide as much flexibility as possible to the public. With an open-house format, hearing participants are able to come and go to the meetings as their

L-003-017	<p>The Project Description on the cover sheet describes the goals of the project in terms of improved seismic safety and maintaining or improving mobility for people and goods. We strongly recommend that meeting transportation goals and needs throughout the whole area needs to be examined, not just a narrowly defined SR-99 corridor.</p> <p>The Final EIS should also include goals of maintaining or improving:</p> <ul style="list-style-type: none"> ▪ the urban environment and pedestrian experience ▪ clean air, and ▪ fish habitat and clean water
L-003-018	<p>1.2 The first statement notes that the Alaskan Way Viaduct provides "vital roadway capacity that cannot be provided elsewhere in the region." While we understand that this is a summary document, it should provide rationale to substantiate this statement characterization of this corridor.</p> <p>The statement "usually congested I-5" should provide some definition of congestion (% of time/level over capacity, etc).</p> <p>This chapter does a good job of describing the five alternatives with accompanying graphics comparing them. The Commissions urge that the following comments and questions be addressed in the Final EIS to provide sufficient information and consideration of alternatives.</p>
L-003-019	<p>2.3 Alternatives</p> <p>Chapter 1 Why We Need the Project</p> <p>It seems that another alternative should be examined in the Final EIS which would involve making improvements to I-5 and the arterials and mass transit through downtown to accommodate the traffic through the downtown area with the use of a four lane surface street along the waterfront. This could reduce the construction timeframe and costs and allow for the new roadway to operate at a lower traffic count as the remaining N-S roads would be more effective. It seems that this type of option should already be part of the team's earthquake emergency preparedness planning and should therefore be easy to add to the final EIS.</p>
L-003-020	<p>The tunnel alternatives should evaluate the inclusion of mass transit (fixed rail options). The cost and difficulty of tunneling suggests we should look for the maximum public benefit from such projects. It seems irresponsible to not include at least a provision for future mass transit in the tunnel.</p>
L-003-021	<p>The alternatives should also include a variant of the tunnel alternative that puts the northbound tunnel under Western, with one lane coming to the surface at Bell and the other two lanes at the Battery Street tunnel.</p>

schedules allows, making the meetings more convenient for many people. Please refer to the Final EIS for current information.

L-003-010

Thank you for your comments supporting the presentation of the Chapter 2 summary. Your comments do not include specific suggestions to help us improve organization; however, the presentation is somewhat constrained by NEPA and SEPA requirements dictating the content of the summary. We did, however, work closely with City staff in developing the summary chapters for this and subsequent EISs.

Cost-benefit analysis is not required by NEPA regulations, though it is clearly appropriate to discuss both qualitative and quantitative values as they pertain to the alternatives and choice made related to the preferred alternative. This type of discussion is included in the Final EIS.

L-003-011

The type of economic analysis requested is not relevant based upon the project's purpose and need.

L-003-012

Both the Cut-and-Cover Tunnel and the Elevated Structure Alternatives evaluated in the Final EIS feature an Alaskan Way surface street with four lanes of traffic (two lanes each direction) and a center turn lane. Double streetcar tracks would allow the waterfront streetcar to share the inside traffic lane in both directions. The center lane would have alternating turn pockets and streetcar stops between Pine and Broad Streets. Both alternatives provide space for sidewalks, bicycle lanes, and parking/loading lanes. However, the lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Specifically, compared to the Cut-

L-003-021	Lowering the Battery St. tunnel portal would allow the southbound tunnel to go under both Western and Elliott and continue lidded for most of the way south, thus creating developable land. A significant benefit of this option is the possibility to significantly shorten the down-time of the Viaduct.
L-003-022	<p>CHAPTER 2 Summary and Comparison of Alternatives</p> <p>2.4 In earlier briefings to the Joint SDC/SPC meetings, staff described a seawall replacement alternate like that proposed for the Sculpture Park as much less costly and much more beneficial for aquatic habitat. This alternative should be included in at least one of the alternatives in the Final EIS, with an analysis of its benefits compared to other configurations.</p>
L-003-023	<p>2.5 Comparison of Costs among Alternatives</p> <p>Consistent with the purpose and need statement, the Alaskan Way Viaduct corridor has been construed more broadly than simply the elevated facility at risk of failure resulting from a major seismic event. It would be appropriate to have the various cost elements of the "project" broken out by categories or groups of investments that reflect the various components as presented in the purpose and need statement. At a minimum, the corridor and the resulting "project" appear to include the Coleman Dock expansion, the Seattle Seawall replacement, connectivity improvements to north-end of corridor surface streets, connections at SR519, temporary structures erected during construction, and a Viaduct replacement structure (varying by alternative).</p> <p>It is not clear from the alternatives descriptions what the independent cost is of the seawall construction (e.g. from surface alt). This should be identified and called out in the Final EIS since it is an important consideration when looking at the costs of the various alternatives.</p>
L-003-024	<p>2.9</p> <p>What are the financial costs associated with saving the existing Battery Street Tunnel? It is reused in all schemes and it appears to create some difficulties and negative impacts because of its location relative to the surface and tunnel alternatives. What would the costs and associated benefits be of relocating/rebuilding the tunnel deeper so that the surface and tunnel alternatives would not have to rely on the elevated roadways in front of the Pike Place Market to connect to Aurora Ave North? The Final EIS should consider this option.</p>
L-003-025	<p>2-10 Traffic Speeds</p> <p>The Commissions question whether travel speeds are relevant for this relatively short distance of SR99. The Final EIS should provide a clear explanation of the relative importance that traffic speed and how this relates to other criteria used to compare the alternatives.</p>

and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the other two alternatives.

Under the Bored Tunnel Alternative, the City of Seattle would lead the project to rebuild and improve the Alaskan Way Surface Street between S. King Street and Pine Street. Generally, the new street would be located east of the existing Alaskan Way surface street where the viaduct is today to create a wider public space along the waterfront the new street would include sidewalks, bicycle facilities, parking/loading zones, and signalized pedestrian crossings at cross-streets.

L-003-013

The summary of the environmental disciplines is contained in Chapter 2 of the 2004 Draft EIS, Chapter 3 of the 2006 Supplemental Draft EIS, and Chapter 2 of the 2010 Supplemental EIS. In the Final EIS, the Summary precedes all of the other chapters. Rather than developing a large matrix, the environmental disciplines are summarized and discussed in a question and answer format. There are several exhibits within the chapters that help to make the information in the text clear.

L-003-014

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the other two alternatives. Extended closure of SR 99 would have severe adverse effects on Seattle. Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS provides a more in-depth comparison of tradeoffs for the three alternatives.

L-003-026	<p>2 - 11 Trips and Travel Times</p> <p>While the daily traffic volumes are useful, it would be more helpful to also show the hourly distributions of these traffic volumes in the Final EIS, along with comparisons with transportation corridors that carry similar volumes.</p>
L-003-027	<p>The DEIS lacks a comparison of how the alternatives accommodate improvements to the ferry terminal and improvements for vehicle traffic and increased ridership for walk-on/ pedestrian traffic on the ferries. This is an important set of considerations and should be provided in the Final EIS.</p>
L-003-028	<p>The characteristics of the trips on the AWV are not found in this section. The Final EIS should include information that addresses the following questions:</p> <p>What is the split between through trips and to trips?</p> <ul style="list-style-type: none"> ▪ What are trip types or purposes of through trips? For example which are related to vital economic activity as opposed to a personal trips? ▪ How do increases in vehicle miles traveled compare to population increases along corridor? If so what is the relationship? ▪ What data was collected and what was learned from the period when the viaduct was completely shut down after the Nisqually Earthquake? How might it inform this evaluation?
L-003-029	<p>2 - 14 Parking</p> <p>The text should explain that basis for inferring that it is the City's responsibility to subsidize free and/or inexpensive (metered) storage (i.e. parking) of private automobiles. The Final EIS should address how this relates to City parking policies and the Comprehensive Plan.</p>
L-003-030	<p>2 - 15 Character and Views along the Waterfront</p> <p>The Commissions question the value and benefit that is attributed to views from vehicles traveling on the Viaduct. While it is true that there are significant views, it is not at all clear that this should be accorded "scenic view" values that then need to be protected. The City and State should be very careful in seeming to assign this value since it has little to do with the primary transportation purposes of the facility.</p>

Overall construction effects of each of the alternatives are described in Final EIS Appendix C, Transportation Discipline Report. For environmental documentation purposes, the worst stage of construction for traffic was analyzed quantitatively while the overall construction activities were described qualitatively. Demolition of the existing Alaskan Way Viaduct would occur as part of the viaduct replacement project. As part of that project, standard maintenance of traffic during construction plans will be developed, communicated with the general public, and implemented during project construction.

L-003-015

The level of detail requested for the economic analysis for individual businesses is beyond the scope of the Final EIS. Impacts were evaluated by separate business districts, as appropriate, that share common economic characteristics such as location, reliance on on-street, short-term parking for customers, business size, and access. Assessments of the total value of individual businesses are typically not found within publicly available information. Evaluations of an individual business' ability to "sustain the impacts of continuous construction" would be speculative and would rely on information that may not be able to be independently verified. For these reasons, the economic analysis limited itself to identified business districts as the smallest division for analysis.

The project acknowledges that construction activities, especially along the central waterfront, would interfere with access to businesses. However, a primary goal of construction planning is to maintain adequate access to all businesses so they can continue to operate. Economic effects and mitigation measures for businesses during construction are presented in Chapter 8 of the Final EIS.

L-003-016

The No Build Alternative is required as part of NEPA, and, therefore, it is

L-003-031	<p>2-20 Other Issues Considered</p> <p>It seems intuitive that a surface option could be built in substantially less time with associated lower costs. If this is true, it should be explained and validated more clearly.</p>
L-003-032	<p>2-21 Construction</p> <p>The Commissions have serious concerns about the magnitude and duration of the construction impacts described for the alternatives, particularly constructing a "temporary" elevated structure which could make the area feel like a construction zone for nearly a decade. Looking at Exhibits 2-29; 2-30 and 2-32 it is difficult to see how any resident or business on the waterfront could survive this scenario. This project could completely devastate the waterfront for the duration of construction and take several years afterwards for recovery. The Commissions strongly recommend that alternative construction strategies should be examined in the Final EIS. These should include making improvements to I-5 and the arterials through downtown to accommodate the traffic during the project. This would reduce the construction timeframe and costs and allow for the new roadway to operate at a lower traffic count as the remaining N-S roads would permanently be more effective.</p>
L-003-033	<p>The Final EIS should identify and clearly evaluate the risks of the five options, particularly related to seismic vulnerability, risks to pedestrians and building occupants from falling objects and debris during construction, air quality, etc.</p>
L-003-034	<p>Finally, the Final EIS should address the following questions:</p> <ul style="list-style-type: none"> ➤ What is the cost, travel times and duration of the detour routes? ➤ Will the duration be long enough to effect permanent changes to travel patterns? If so, what could be the impacts of this change on the project? ➤ What improvements to I-5 could be made to offset any diverted traffic? ➤ Was induced traffic factored in?
L-003-035	
L-003-036	
L-003-037	<p>Finally, the footnote on buildings, employees and acres affected regarding surface should provide more information about this issue.</p>

included in the EIS. However, the No Build Alternative would not address the safety concerns associated with the aging viaduct, a main component of the project's purpose and need statement. The lead agencies have agreed that because the viaduct structure poses significant safety concerns, it is not an option to do nothing (i.e., select the No Build Alternative as the preferred alternative). The Final EIS includes information on the No Build Alternative for comparison, but much of the discussion is between the build alternatives because this allows the public and decision-makers compare between alternatives that are viable options for this project.

L-003-017

The recommendations for the project's purpose and need statement are noted. The purpose and need statement has been updated since 2004 and reflects the goals and objectives of a transportation facility replacement project (as this project is). See Chapter 1 of the Final EIS for the current purpose and need statement.

L-003-018

This section of the document has been revised since the 2004 Draft EIS and no longer characterizes I-5 as "unusually congested". Please see the Final EIS for revised text, updated information about the project, and the role of SR 99 in the broader transportation network.

L-003-019

Many people asked the lead agencies to consider an alternative that would remove the viaduct and replace it with a four-lane surface roadway along Alaskan Way and include transit improvements. Without a host of improvements and modifications, a four-lane Alaskan Way would create even more congestion on I-5 and downtown streets than the alternatives evaluated in the Draft and Supplemental Draft EISs. Transportation studies performed for this project indicate that replacing

L-003-038	ER 10 Construction Impacts and Mitigation	10 - 14 Effects on economy and local businesses In a number of locations the DEIS quite strongly addresses the impacts of construction on the current patterns of use, tempering that concern with the obvious benefits of open space for the tunnel options and not for the other options. The Final EIS should provide a more balanced analysis of construction impacts for all options.
L-003-039		The statement that "some businesses could be negatively affected if people choose to avoid the area during construction" seems naïve and optimistic. Is this realistic given the extended time periods involved and the nature of the businesses? The statement (Appendix B: p 64) that business owners "may experience economic effects due to the impacts" appears to substantially underestimate impacts considering the magnitude and duration of the construction activity. It seems likely that many small businesses would simply not be viable. If so, the negative impact should be acknowledged and addressed early with a creative mitigation plan. The Final EIS should do a more thorough job of analyzing the current business conditions including what are the pedestrian counts for different times of the year and what is the economic value to the city/region beyond the business ownership (i.e. what is it worth to keep them alive and accessible). This information should be used in a more accurate assessment of impacts and development of potential mitigating measures.
L-003-040	Alternatives Description and Construction Methods Technical Memorandum	The purpose and need statement seem to dictate that during the full extent of construction period, partial operation of the existing or temporary replacement structures will be maintained. A complete assessment of quantifiable construction impacts is not available. Specifically, what are the added or avoided costs (business impacts, cost of temporary structures, travel delay, construction staging efficiencies/inefficiencies, environmental impacts of temporary aerial structures, etc.) of keeping through lanes open in the corridor? Essentially, the question of what construction management approaches to be employed requires a more detailed assessment of these various strategies, their timelines, costs, and localized economic and environmental impacts. We believe that alternative construction approaches probably need to be evaluated, including those that do not provide through vehicle capacity in the corridor throughout the construction period.
L-003-041		The construction schedule assumes 24-hour/7-day construction to meet the 7.5 – 11 year construction periods (+18 months of preparation), but there is limited discussion regarding noise, light and vibration impacts at night. Nighttime construction is not typical and should be addressed in more detail, especially in residential areas. The Final EIS should expand the analysis and discussion of these impacts.
L-003-042		Construction impacts on tourism and cruise ship industry from 7 to 11 years is significant. The economic effects during construction could be quite significant to all businesses, particularly the waterfront businesses and should

the viaduct with a four-lane surface street would substantially increase congestion for most of the day and part of the evening on I-5 through downtown Seattle, downtown streets, and Alaskan Way. On downtown streets, traffic would increase by 30 percent; though traffic increases to specific areas like Pioneer Square and the waterfront could exceed 30 percent. With a four-lane roadway, traffic on Alaskan Way would quadruple to 35,000 to 56,000 vehicles per day compared to about 10,000 vehicles today. This traffic increase would make Alaskan Way the busiest street downtown, carrying more traffic than Mercer Street does today. The increased traffic congestion would also make travel times worse for buses, making transit improvements along these streets largely ineffective. Finally, neighborhoods west of I-5 (Ballard, Queen Anne, Magnolia, and West Seattle) would be less accessible and would face longer commute times.

L-003-020

Although transit has been considered when developing all of the alternatives, rail tracks inside of the tunnel alternatives have not been included as part of the project. Future transit service enhancements in downtown Seattle are expected to include extending the Seattle Streetcar along First Avenue as well as other improvements such as Sound Transit light rail and commuter rail expansion under Sound Transit 2, and the King County Metro RapidRide bus program.

L-003-021

The alignment of the Cut-and-Cover Tunnel Alternative discussed in the 2006 Supplemental Draft EIS and Final EIS does go underneath Elliott and Western Avenues and includes a lid built over SR 99 linking Steinbrueck Park and the Pike Place Market to the waterfront.

L-003-022

The lead agencies have identified the Bored Tunnel Alternative as the

L-003-042	not be downplayed. 1,100 businesses (+/-) are located within one block of the project area. It is realistic to assume that construction "could cause people to avoid the waterfront, which could reduce business revenues". More analysis of the economic impacts and appropriate mitigation should be detailed in the Final EIS.
L-003-043	The estimated volume of excavated soil (including contaminated soil) ranges from 741,000 CY to 2,290,000 CY. The added impacts from truck traffic for soil removal should be included in the Final EIS, including proposed trucking volumes and more specific information regarding trucking routes. The additional volume of trucks along the major existing truck routes should be analyzed and if necessary, mitigated.
L-003-044	There is also mention of barging soils. If this is a viable option, more discussion should be included in the Final EIS including impacts to water (fish, wildlife, etc).
L-003-045	Construction impacts to neighborhoods (residential in particular) could be significant – sidewalk and street closures (both long and short term), nighttime construction, detours, increased congestion, etc. The Final EIS should fully describe possible mitigation measures to keep residents informed.
L-003-046	There does not appear to be a discussion of construction sequencing that was not linear (page 134 of the "big book"). Has there been any thought to beginning construction at different places along the viaduct simultaneously or this just assumed? This could increase impacts but perhaps for a shorter period of time and should be evaluated in the Final EIS.
L-003-047	It is imperative that transit operations during construction not only meet existing standards but perhaps exceed them, creating more opportunities for commuters from the north and south. During construction downtown streets will probably be more congested, potentially reducing the reliability of transit service. Close coordination and out-of-the box thinking with Metro should be encouraged. The Final EIS should examine a range of mitigation measures.
L-003-048 C: Transportation Discipline Report Memorandum	Traffic Operations Evaluation: Existing facility scenario data presented for comparison of alternative traffic evaluations is for 2030. When 2030 existing facility values are compared with proposed alternatives it appears that not all alternative designs replace capacity. If this is so, a clear statement is required emphasizing the capacity differences. This is of note since evaluations seem to indicate that the existing system is not at full capacity and little is proposed to alter the capacity of the existing Broad Street tunnel. Throughput analysis is an important opportunity to present this information and distinguish among alternatives, however, clear statements of the importance of such analysis to decision-makers are lacking. This information and analysis should be included in the Final EIS.

preferred alternative. The Bored Tunnel Alternative does not require or include replacing the Elliott Bay Seawall. The City of Seattle is now leading that project with the Corps of Engineers.

For the Cut-and-Cover Tunnel or Elevated Structure Alternatives, a wide variety of seawall replacements have been considered during project development; however, the best solutions for this project are those described in the Final EIS. There are several reasons for not adding material to create new intertidal areas; one is interference with navigation. Also, new material would cause settlement and damage adjacent piers.

L-003-023

Although costs are an important part of project planning and decision-making, they are purposely not part of the environmental review process. Overall project costs are included with the overall project description and are used by the economic impact analysis. Cost estimates by project element were used by the lead agencies in developing the preferred alternative. It should be noted the Colman Dock project is a separate project and its costs are not included with the Alaskan Way Viaduct Replacement project costs.

L-003-024

The fate of the Battery Street Tunnel depends on which alternative is selected. The preferred alternative for this project, the Bored Tunnel Alternative would decommission the Battery Street Tunnel. This alternative also does not rely on elevated roadways in front of Pike Place Market. Please see the Final EIS for current information about the configuration of each proposed build alternative.

L-003-025

The Final EIS evaluates traffic effects using a wide range of metrics

L-003-049	It appears that no alternative examines real operational improvement strategies for parallel surface facilities through downtown Seattle. It is possible that a strict commitment to replacing all existing functionalities could limit the design development for a generally functional Seattle waterfront corridor given real cost and right-of-way constraints. For example, is streetcar replacement justified in all alternatives given low ridership and sizable right-of-way requirements (12" to 13" buffers on each side of the streetcar)?
L-003-050	It appears that alternatives with similar surface configurations (Tunnel, Bypass Tunnel, and Surface) will result in dramatically different surface network operating conditions. This appears to be a function of variable through capacity at separate grade. This may in fact be more of an anomalous modeling result than an expression of a likely outcome that reflects best professional judgment relating to human behavior. It is unclear how the combined use of the regional travel demand model with CORSIM and Synco has contributed to an appropriate description of operational issues associated with different alternatives. These are particularly important questions when build alternatives represent widely varied approaches to corridor investment.
L-003-051	The peak hour operational findings are of interest but should be incorporated into a more comprehensive assessment of alternative viability, or effectiveness analysis. The utility of the project is dependent upon the relationship between full operating benefits during its entire economic life to the construction and operating costs. The Transportation Report contains measures of effectiveness (beginning on page 19) that reflect considerable overlap across the various measures: traffic density, speeds, and hours of delay, traffic distribution, and volume to capacity ratios. Multiple criteria that do not eliminate double counting confound alternative analysis. This pitfall should be avoided. If, on the other hand the measures of effectiveness are not intended to be utilized as part of the development of a preferred alternative, what exactly is their purpose?
L-003-052	The aerial and tunnel alternatives include effective interchange connections at the south portion of the project, however, ramp configuration at the north end vary dramatically for the aerial and tunnel alternatives. The rationale for these important design differences requires justification, particularly since Alaskan Way will receive substantial additional activity with the tunnel alternative, with significant potential to alter the north end of the waterfront. The ramp configurations require more discussion concerning potential re-combination of existing north-end ramps with tunnel and by-pass tunnel designs. The aerial alternative appears to have received the most thought concerning ramp connections/improvements, while the tunnel alternatives have little and include potentially significant adverse of surface street streets (e.g., north end/Alaskan Way, including additional traffic volume and performance of signalized intersections). The Final EIS should contain a more detailed analysis of these designs and their relative impacts.
L-003-053	Vehicle throughput measurement locations appear to reflect present urban conditions and expected areas of change. In light of the project scope, it is noted that little thought has been given to potential changes in

including travel speeds. Since the document has been revised considerably since 2004, please see the Final EIS for updated information related to traffic effects of the build alternatives.

L-003-026

Hourly distributions of traffic on SR 99 are provided in the Final EIS Appendix C, Transportation Discipline Report.

L-003-027

The Colman Dock project planning has been postponed, so the Final EIS does not compare how each alternative would accommodate improvements to the ferry terminal. Assumptions on future demand for ferry traffic, both for auto and non-auto trips, are based on current planning assumptions agreed to by the project and the Washington State Ferries. The project will continue to coordinate with the Washington State Ferries as the planning for the Seattle Ferry Terminal improvements proceeds. Because the project has evolved since comments were submitted in 2004, please refer to the Transportation Discipline Report, Appendix C, of the Final EIS for current information.

L-003-028

Detailed information regarding travel demand and travel patterns, including the nature of through trips and those destined to downtown, are included in the Transportation Discipline Report (Appendix C of the Final EIS). This information is summarized in the Final EIS. The travel demand model used in the evaluation of trip making for the Final EIS incorporates land use and transportation assumptions found in the City of Seattle Comprehensive Plan and the Metropolitan Transportation Plan.

Very little concrete data is available to document the performance of the transportation system during the relatively short closure of the Alaskan Way Viaduct. Most information is in the form of anecdotal experiences.

L-003-053	development activities in the urban area, changes that might require or stimulate alternative project designs (e.g., ramp positions, configurations, and portal locations).
L-003-054 Technology and Data Analysis:	The knowledgeable reader is unable to easily reconstruct the methods employed sufficiently to evaluate the analytical design. So, it becomes difficult to eliminate the possibility of unintended analytical bias. One conclusion that might be drawn is that results of the technical analysis represent near total inelastic demand, not just for total trip demand, but for demand for specific trip destinations, and demands on specific routes and facilities. This is not consistent with economic theories about utility maximization in an urban transportation context.
L-003-055	The rationale for establishing the transportation analysis screen lines needs better explanation. The present analysis prevents effective consideration of changes in ramps and arterials serving the alternatives.
L-003-056	It is noted that South Lake Union traffic forecasts include important additional data. Did other locations benefit from fresh data? For example, operational data for SR519 interchange traffic in connection with the design alternatives is not immediately clear. This is noteworthy since a 20 percent growth in traffic at this interchange seems to be projected.
L-003-057	Discussion and analysis presented in "measures of effectiveness" format is very helpful, presenting information consistently with respect to connectivity, etc.
L-003-058 Environmental Impacts:	It would be useful to indicate in the Final EIS how the potential environmental impacts resulting from a non-operational Alaskan Way Viaduct are to be fully understood and addressed since an alternative where the current facility has not been replaced but is no longer operational as possible scenarios, especially considering the uncertain nature of project funding.
L-003-059 and Non-Motorized Transportation:	Discussion relating to transit connections appears to ignore potential use of AWV design alternatives for high capacity transportation. In light of the project's investment, it is prudent to test designs for the ability to include high volume/capacity transit opportunities. For example, the present design alternatives do not address the absence of transit connections to the CBD to and from the north.
L-003-060	Discussion indicates that pedestrian access to the waterfront from the central business district is an important criterion. Equal treatment of such access for each design alternative in the area of north Alaskan Way/Broad Street is not apparent.

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Some data was collected by transit agencies as part of their regular operations activities. These sources of information were used in the planning efforts to develop construction mitigation measures. More information about these measures can be found in the Transportation Discipline Report.

L-003-029

The Final EIS clarifies Seattle's parking goals and policies as they relate to this project.

L-003-030

Views from the existing Alaskan Way Viaduct, and similar views from the Elevated Structure and Tunnel alternatives were assessed in the Final, Draft Supplemental and Draft EISs and Appendices D and E, Visual Quality Discipline Report and Visual Simulations prepared for the EISs. The analysis considers the Alaskan Way corridor designation as a City of Seattle Scenic Route and also identifies and assesses designated view corridors largely along the east-west streets that end at the waterfront. Views from the road and of the road are both assessed. The evaluation of the visual character and quality of the views, as well as the likely viewer response of drivers and passengers and others viewing the corridor considers a variety of elements. Scenic views from roadways are described in the text as an element of satisfaction for drivers and passengers. Decision makers are provided with an assessment of the range of visual quality impacts of the alternatives as one of many factors balanced in selecting a preferred alternative.

L-003-031

The Surface Alternative is no longer being considered because it did not meet the project's purpose.

L-003-061	If one of the tunnel alternatives is selected, there needs to be a thorough analysis regarding the potential of integrating rapid transit into the tunnel. Planning for a more transit oriented future helps to reinforce the City's transportation goals and policies.
L-003-062	With an eye towards the selection of a preferred alternative, this document must look at the enhancement of bicycle and pedestrian circulation and commutes through the corridor (West Seattle to Magnolia/ Ballard). This should be developed as a separated trail, not bike lanes in the roadway. Analysis of these transportation modes should be included in the Final EIS and taken into consideration in development of the preferred alternative.
D: Visual Quality Technical	While it is not as user-friendly as the introductory EIS report, this appendix is extremely thorough in its analysis of the existing visual environment and impacts of the proposed alternatives.
L-003-063	The hierarchy of views studied in the analysis is not clear in the document. Much of the discussion implies that the views for drivers on SR-99 are of equal or higher value than of pedestrian and building users. An introductory clarifying statement would help understand the relative value given by the analysis.
L-003-064	The document indicates that views from the ferry and for ferry riders are of low value (page 13 and other places in the document). This needs to be re-examined. While the viaduct may not be a prominent in a distant view of the city, it is significant. The considered first impression of the city from the water is that the automobile is dominant. The city has given over the prime land downtown to vehicular traffic at the expense of the urban environment. In addition the visual experience of pedestrians entering the city from the ferry terminal is a very bleak one. The study indicates (page 54) that regular ferry users (commuters) are not sensitive to the view and yet also indicates (pgs 10, 35, and others) that regular users of the viaduct (commuters) are sensitive to views. This seems like a strange and biased conclusion. In addition, there is little acknowledgement in the document that the ferries are heavily used by tourists specifically because of the scenic experience. Likewise the tourists using local tour boats and cruise ships should be factored into the consideration of the importance of views of the waterfront and viaduct from the waterside.
L-003-065	Consideration should be given to likely changes that would occur to "viewer population size" at key locations with the removal of aerial structures.
L-003-066	The Final EIS needs a clearer statement about the lack of visual coherence of the city as viewed from the waterfront in the existing condition and with the rebuild and aerial alternatives. Specifically: this lack of coherence makes way-finding from the waterfront into the adjacent neighborhoods almost impossible. The

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L-003-032

After the 2004 Draft EIS was issued, numerous comments were received relating to the visual impacts and other negative effects of the Battery Street Flyover Detour. As the design plans for the Cut-and-Cover Tunnel and the Elevated Structure Alternatives evolved, the Battery Street Flyover Detour was eliminated.

In the Final EIS, the Broad Street Detour would construct a temporary trestle structure from approximately Alaskan Way and Vine Street to the intersection of Broad Street and Western Avenue. The Broad Street Detour is only for the Elevated Structure Alternative and would be in place for approximately 27 months while the improvements to the Battery Street Tunnel are completed. An updated description of the alternatives and of construction-related transportation effects is provided in the Final EIS and Appendix C, Transportation Discipline Report.

L-003-033

The alternatives have been refined since the publication of the 2004 Draft EIS. Please see the Final EIS for current information on the proposed build alternatives.

The build alternatives evaluated in the Final EIS would all meet current seismic standards for earthquake resistance. In addition, the very removal of the existing viaduct addresses the seismic vulnerability along this transportation corridor.

Construction effects are discussed in Chapter 6 of the Final EIS. Safety precautions will be taken during construction. Pedestrians will be directed around heavy construction zones.

L-003-034

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at

L-003-066	columns and aerial roadways obscure the street-grid and the buildings facing the waterfront, that are the primary visual clues that we use to understand and navigate the urban environment.
L-003-067	The Final EIS needs a discussion of the historical (pre-viaduct and earlier) visual environment. The Final EIS and should consider the possibilities to recapture lost visual quality and the merits of such opportunities.
L-003-068	The discussion of light and glare throughout the document seems to limit the discussion to the effects of street lighting. The Final EIS should include a discussion about the impacts of vehicle headlights in the various alternatives.
L-003-069	The visual analysis matrix (Exhibit 5-1) is a useful tool and easy to understand. However given the extended (8-11 year) length of construction it would be useful to add a companion document recording construction visual impacts in the same way. Also there needs to be some way to quantify the visual impact of tunnel vent structures in this matrix. Additional minor points:
L-003-070	<ul style="list-style-type: none"> • Page 22 Table 3-4 and Map 3-5: are #s 4 and 5 switched? • Page 23: #21- add P-patch as primary use. • Page 93: Should reference to A-23 actually be A-22? • What are the flyovers shown in the Surface Alternatives (A-23; A-33 and A-35)?
L-003-071	<ul style="list-style-type: none"> • How do cars get from the Alaskan Way surface street to the Battery Street Tunnel in the Tunnel options? A-65 indicates there is no connection. Is this acceptable for traffic mobility in the city?
L-003-072 Visual Simulations	This section seems incomplete as all five alternatives are not covered in their entirety. The simulations are too simplistic and could be made more realistic with real people, cars, and known developments. They present exaggerated scenarios where the elevated structures are shown to loom over the City - and hence seem biased toward the tunnel alternatives. A more even-handed treatment of all five alternatives in the Final EIS is advised.
L-003-073	There need to be visual simulations added for the tunnel vent structures at both the height required by current buildings (5 – 6 stories) and once those areas reach their full zoning envelope (15 – 18 stories).

least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

L-003-035

Access and circulation measures for general purpose traffic in the downtown area are being examined and include assessments of key alternative routes such as I-5 and various major downtown arterial streets. Specific construction mitigation measures are being developed and more information about them can be found in the Transportation Discipline Report of the Final EIS. However, improvements to I-5 would be part of another project.

L-003-036

Induced traffic is a phenomenon that typically relates to an increase in capacity within a corridor (new trips that occur since congestion levels are reduced). With respect to construction impacts, the capacity of the downtown transportation will be reduced during construction activity. Travel forecasting for the project estimates that the opposite of induced traffic--that is, traffic reductions--are likely during the construction period. These reductions in traffic are expected to vary

F: Noise and Vibration Discipline Report	<p>Overall these review comments focus on the adequacy of information, analysis, and evaluation presented concerning three principle matters:</p> <ol style="list-style-type: none"> 1. Potential effects on existing land uses, activities, and properties 2. Potential effects on future land uses and activities 3. Potential need for offsetting compensation or mitigation actions
L-003-074	<p>EIS materials define 10 dBA noise increases as substantial. This contrasts with criteria and evaluations generally applied by the City of Seattle and other development sponsors, identifying an increase up to 5 dBA as a moderate potential effect, 5-10 dBA as a significant effect, and an increase of more than 10 dBA as a very serious adverse effect.</p>
L-003-075	<p>For developed areas, including what appears to be the entire central waterfront area, area in the vicinity of Colman Dock and Pioneer Square, and existing industrial areas south of South King Street, 72 dBA is indicated as the baseline noise criterion. Potential noise increases are evaluated in contrast to 72 dBA as an existing background condition. This noise level is characterized as a very noisy urban area. The Final EIS should address more fully the impacts of this noise level on urban activities and uses along the waterfront.</p> <p>No baseline noise measurements were obtained for area south of South King Street, with the exception of two locations southeast of the South King Street/First Avenue South intersection. Generally, the EIS indicates that area south of South King Street does not include noise-sensitive land uses.</p> <p>In the Rebuild alternative the expected noise levels in the north end of the project area may increase to levels in excess of approximately 75 dBA.</p> <p>In the Tunnel alternative, the area at the north end of the project (south of the Battery Street Tunnel) is expected to increase 6 dBA. It is unclear if this condition affects areas east and west of the project.</p> <p>No information is presented describing noise conditions at south end of project, south of South King Street, for aerial or tunnel project alternatives. These issues should be addressed in the Final EIS.</p> <p>Potential effects on existing land uses, activities, and properties: In general, it is assumed that present land uses contend with existing noise produced by the AWV. However, it is important to note that proposed tunnel alternatives have the potential to increase noise at the north and south ends of the project area, including potentially important sound level increases at the north portal and potentially significant additional sound production at the south tunnel portal.</p>
	<p>Tunnel construction would benefit a substantial area of the waterfront by replacing the existing overhead</p>

depending on the magnitude of the capacity reduction. A detailed traffic analysis for construction and operation has been conducted for all alternatives and is described in this Final EIS. Please refer to Appendix C, Transportation Discipline Report, for additional detailed analysis of impacts to transportation elements, including event traffic.

L-003-037

The Surface Alternative was not carried forward into the Final EIS.

L-003-038

The lead agencies worked hard to present a balanced discussion of impacts for all of the alternatives in the 2004 Draft EIS, and all subsequent environmental documents developed for the project.

L-003-039

The types of impacts that you mention are secondary economic impacts. For the EIS, the degree of accuracy regarding the secondary impacts to business is at the business-district level. Because of the diversity of business types along the entire 2-mile corridor, a business-by-business analysis is not feasible and is beyond the scope of this EIS. The Final EIS identifies those business districts that clearly have identifiable risk factors that will be directly affected by the project, such as loss of parking for Pioneer Square. Chapter 8 of the Final EIS includes mitigation measures that address project effects to businesses.

Pedestrian counts along the Central Waterfront were performed twice during 2006 (winter and summer). The results of the pedestrian counts are included in the Transportation Discipline Report, Appendix C of the Final EIS.

L-003-040

The 2004 Draft EIS evaluated one construction plan that considered brief

L-003-075	viaduct, but two features of the tunnel alternatives are important for decision makers to consider: (1) an exposed ramped roadway connecting the existing Battery Street tunnel with the proposed tunnel alternatives will add to the noise environment in the Belltown area and adjacent waterfront locations and (2) the existing viaduct south of South King Street, extending to the vicinity of South Atlantic/South Massachusetts streets will be replaced with surface routes, with a tunnel entrance in the area of South King Street, adding significantly to the existing noise environment in the area.
L-003-076	<p>Potential effects on future land uses and activities: The potential for increased noise levels at the north and south ends of the project require careful evaluation. Adding to the noise environment in the area of existing commercial and residential uses and where substantial recent residential development has been taken place will be important to all in the north portion of the project. Additional analysis of the effect of increased noise on future land uses is required in the Final EIS.</p> <p>The south portion of the project includes existing commercial, residential, and industrial uses. If noise conditions in this area increase significantly, commercial and residential uses may be adversely affected. If future land use changes, particularly altering existing industrial areas for commercial and residential use, are justified, these subsequent uses would be significantly foreclosed due to increased noise levels.</p>
L-003-077	<p>Potential need for offsetting compensation or mitigation actions: EIS materials require additional information describing actions and methods for reducing anticipated adverse noise effects. Little analysis of potential steps for avoiding and minimizing adverse noise effects is presented.</p>
L-003-078 5.028 Land Use and Shorelines Technical Memorandum	<p>While the discussion of current land use is detailed and the market conditions are outlined, there doesn't seem to be much real investigation of the relative development potential of each alternative. Nor is there much consideration of the enhanced land value to the adjacent properties. Unlike the monorail, some of the alternatives will add significant value to adjacent properties offering greater views and less noise and air pollution. Such potential increases in land values should be considered not only in the land use analysis, but also in the project cost/benefit analysis. Land use impacts will be positive in many cases.</p> <p>The development potential needs to be examined in detail, almost on a site by site basis. This project offers the opportunity to think of transportation projects as community development projects as well. It is imperative that this project factor community development impacts and opportunities into its scope. This will ensure that the full value of the selected alternative is realized and will help to build support for the project.</p>
L-003-079	It would be helpful for Final EIS to acknowledge and describe what the City is doing on the Waterfront Planning Process. This will provide an important connection between these two parallel and related planning efforts.

closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

L-003-041

Construction noise and vibration effects are qualitatively discussed in the Noise Discipline Report. Please refer to Appendix F, Noise Discipline Report, for additional details. Construction of the project will require nighttime construction activities, and the City of Seattle requires a Major Public Project Noise Variance. Construction noise mitigation requirements would be developed and specified in the noise variance. The Major Public Project Noise Variance will be presented for public comment. With regard to the potential for nighttime construction light, the City will also be regulating the degree of light allowed through the various construction permits that will be necessary, such as street use. Mitigation measures are described in the Final EIS, Chapter 8.

L-003-042

The Final EIS discusses the economic impact of the project during construction on businesses in Chapter 6 and presents potential

L-003-080	<p>This review is focused on an important goal of making sure that this information will be used to make an informed decision regarding a preferred alternative. The Final EIS should reference the decision making process and also include a comparison of the alternatives relative to the project objectives in arriving at the preferred alternative.</p>
L-003-081	<p>Specific comments Consider the Mayor's Center City initiative in the existing context section. At the very least, the downtown EIS should be referenced in this section regarding the potential development patterns that might result from changing downtown zoning in some locations.</p> <p>It is not clear where there would not be more development potential with the by-pass tunnel option. This should be considered in the Final EIS. For example, redevelopment potential seems to be discounted because of parking and other concerns, but it is not clear why this is so. The Final EIS needs to provide substantiation for these conclusions (Pg 58 of the Appendix). Related to this is the assumption that parking would be lost in all alternatives. The Final EIS should provide a more detailed analysis of where it would be lost and the expected impact of that loss.</p>
L-003-082	<p>Regarding the photos on pgs. 102 and 110 of the EIS. It is not clear that such a big street is needed and we recommend consideration of other options.</p>
L-003-083	<p>The appendix is generally thorough in its recitation of the facts. Most of its detailed conclusions are supportable, however there are couple of areas that are questionable:</p>
L-003-084	<ul style="list-style-type: none"> ▪ First, there seems to be a disconnect between Chapter 5 and 7. Chapter 5 repeatedly draws the conclusion that there will be little or no effect on land uses. But Chapter 7 acknowledges repeatedly that there will be some influences on future land uses, without speculating on what those influences might be. ▪ One effect that should be addressed more specifically in Chapter 6 is the devastating effect on retail sales and services that construction projects of this nature usually have along their path. Those businesses that depend on foot traffic and/or parking will see a serious decline in their revenues for the duration of construction and for some time thereafter if they remain in place and survive. Many will not survive or will relocate. It is not the case that these uses will simply spring back up when the construction is over, as the conditions which caused them to be there in the first place may not exist anymore, or the businesses may be thriving in their new locations and have no reason to return.

mitigation measures in Chapter 8. The main objective of the mitigation measures included in the Final EIS is to maintain the viability of these waterfront businesses that will bear the brunt of the economic impacts during construction. The mitigation measures are intended to provide mitigation for all businesses along the entire construction corridor.

L-003-043

Specific construction haul routes will be identified based on final construction staging and phasing plans for the project and will be fully developed with the construction contractor. Chapter 6 of the Final EIS and Chapter 6 of Appendix C, Transportation Discipline Report, contain some information regarding proposed construction routes during the various construction stages as well as transportation effects during the most severe stage of construction. Overall, construction haul traffic would not comprise a significant portion of the overall downtown traffic volumes. Efforts will be made to route construction haul trucks in a manner that limits the impact to general traffic.

L-003-044

Chapter 6 in the Wildlife, Fish, and Vegetation Discipline Report, Appendix N of the Final EIS, discusses the potential for delivery and removal of construction materials by barge. Barge operations would be similar to existing vessel navigation movements along the shoreline. The use of barges would be determined by the contractor and any activities would be subject to permit conditions.

L-003-045

The impacts to neighborhoods, particularly residential areas, are described in the Final EIS Appendix H, Social Discipline Report, Chapter 5, Operational Effects, Mitigation, and Benefits. Chapter 8 of the Final EIS also presents potential mitigation measures.

L-003-084	For example, many of the ground-floor businesses along Western in the central segment are retail showrooms for high-end home furnishings. This location serves them well as the rents are no doubt lower than elsewhere (say the downtown commercial core) and the large, high-ceiling spaces are appropriate for their needs. These businesses may be expected to relocate rather than endure the construction. Whether they return will depend on their success in their new locations, as well as the character of the waterfront post-construction, including the amount of parking available. Dislocation can have an effect on land use changes and should be addressed in the Final EIS.
L-003-085	The loss of parking should also be addressed more prominently. Currently, a general discussion of the problem is buried under the Aerial Alternative (on page 52), where it is acknowledged that loss of parking may make some uses nonconforming. Combine this with the dislocation of businesses and there is a potential problem. Not only may some use be dislocated, but new uses may be constrained by loss of parking. The choice of alternative may have an effect here. Under the two tunnel alternatives, it seems likely that there may be a demand for increased recreational uses in place of the existing retail uses mentioned above; yet these uses will need more parking than the existing uses. Thus, it may be appropriate for some mitigation in the form of public parking facility to support existing, new, and returning uses particularly in the central area.
L-003-086	Finally, an alternative that was put forth at the Waterfront Charrette should be considered in the Final EIS, possibly as a variation of one of the tunnel options. This calls for the north bound tunnel under Western Avenue with just the southbound tunnel as the seawall. This would allow the existing viaduct to remain in service through most of the construction. This proposal would create new buildable land where the ramps now run up to the Battery Street tunnel. Uses on the new land could be commercial, residential, or (most likely) mixed, with some significant open spaces. This alternative deserves serious consideration as it would allow for easier phasing and would provide greater development potential just east of the proposed seawall tunnel. It could also have potential cost savings and less construction disruption than other alternatives.
L-003-087 Issues and Recreation Technical Memorandum	Appendix H contains a very thorough analysis of the construction sites and of the proposed impacts each of the alternatives. The following additions should be included in the final report. The appendix considers park facilities within 3-5 blocks of existing or proposed facilities are identified as being within the potential impact area of construction or operational impacts. The impacts may more accurately consider a 12-15 block area of impacts. The report should further consider that displaced users will more heavily use recreation facilities in other parts of the city as access and desirability of the waterfront will be greatly diminished.

L-003-046

Please see the Final EIS for updated information about construction sequencing.

L-003-047

The project has been in close coordination with the transit agencies that operate services in downtown Seattle and would be affected by project construction activities. Appendix C, Transportation Discipline Report, of the Final EIS documents a range of measures to help maintain existing transit service levels, and proposes opportunities for new service strategically targeted to points of origin that are heavily affected by project construction.

L-003-048

Detailed analysis of transportation elements associated with all alternatives is provided in Appendix C, Transportation Discipline Report, of the Final EIS. Vehicle and person throughput is presented as one of the many transportation related measures included in the appendix.

L-003-049

Opportunities to improve or develop alternate corridors are limited by the lack of parallel routes, the densely developed setting, and competing needs/uses on alternate routes. Opportunities on alternate corridors were considered prior to initial screening and again during transportation planning for the construction period. If the preferred alternative is selected, the City of Seattle's Central Waterfront Project would create 9 acres of new public space along the waterfront corridor once the viaduct is removed.

L-003-050

The application of travel demand modeling to estimate projected users followed by traffic operations models to study the detailed effects on

L-003-088		In the tunnel options the impacts of not lidding the portion of SR99 directly in front of Victor Steinbrueck Park and Pike Place Market should receive more emphasis. The tunnel options and the rebuild option should include lidding the last several hundred feet of roadway as well as any scheme that utilizes the Battery Street Tunnel.
L-003-089		The impacts on the Aquarium is very serious, particularly the construction impacts which will drive away users for a long period of time and could harm the current sea creatures and exhibits. Mitigation measures should be described in the Final EIS.
L-003-090	I: Social Resources Technical Memorandum	This technical memorandum does a very thorough job of describing the "who and what" occurring in each segment (South, Central, North, N. Waterfront) of the project based on analysis of data from the census, local social services groups, housing providers, etc. While it describes the impacts for each of the alternatives, it fails to explain the "why" or "what could be done" in some instances. For example, on pg. 110, why do certain properties (Local 19) need to be acquisitioned and not others? Some explanation of why certain decisions are made for each alternative would be helpful to readers.
L-003-091		When describing how the adverse affects of this project will be mitigated, the memo fails to mention who will be responsible for them (WSDOT, City of Seattle, etc.). It is not enough for the memo to describe how the adverse effects will be mitigated if there is no accountability. Also, more measures should be taken to make sure the people (residents, homeless, employees) of the area are aware of what is going on. A newsletter is not enough (page 155). Communications should include use of websites, a radio station dedicated to what will be happening with the AWV project, similar to "Highway Advisory AM Radio updates" so that people know what is going on around their business, home, cultural/social/sports/institutional destination 24 hours a day. If construction occurs 24 hours a day, then something like this may lessen the adverse impacts of the project during construction or at least help people anticipate and find ways to avoid them. It is critical that a commitment is made at the outset of the project for ongoing outreach and communication throughout the entire life of the project. The Final EIS should be clear about the scope of these mitigation strategies, responsibility and accountability.
L-003-092	Environmental Justice Technical Memorandum	This document is very straight-forward and clearly states that the AWV and seawall project: (1) will take many years to complete; (2) is presented in only preliminary design concepts at present, which are likely to change significantly; and (3) will require continuing monitoring of plans and actions to protect disadvantaged communities. However, none of the other materials were so clear in stating that evaluating the potential effects due to the project cannot be precise since the project will change in response to numerous technical and institutional requirements and that conclusions concerning potential adverse effects are equally subject to significant changes.

traffic operations caused by the projected users is a standard component of transportation planning. Please see the Final EIS and Appendix C, Transportation Discipline Report, for updated traffic analysis for the build alternatives.

L-003-051

The ranges of measures of effectiveness are intended to provide a broad and comprehensive picture of transportation conditions for each of the alternatives studied. While they inform the selection of a preferred alternative, no formal scoring or weighting system was employed to combine the results of these measures. Therefore, measures that in some ways quantify similar aspects were not double counted. Please see the Final EIS and Appendix C, Transportation Discipline Report for updated analysis.

L-003-052

The Final EIS includes detailed analysis of the Bored Tunnel Alternative, the Cut-and-Cover Tunnel Alternative and Elevated Structure Alternative. For the Bored Tunnel Alternative, northbound off-ramp and southbound on-ramps would be provided at Republican Street. A northbound off-ramp to Western Avenue and a southbound on-ramp from Elliott Avenue would be provided under both the Cut-and-Cover Tunnel Alternative and Elevated Structure Alternative. Please see the Final EIS Appendix C, Transportation Discipline Report, for detailed analysis of these designs and their relative impacts.

L-003-053

The configuration of the project alternatives and transportation analyses consider known planned developments and reflected growth projections developed by the Puget Sound Regional Council. Note that vehicle throughput measurement locations were selected based on the ability to directly measure and compare across the range of project

L-003-093	The memorandum indicates that on-going effort is required through all phases of the project (development, design, implementation, and operation) to ensure the needs of disadvantaged communities are not adversely affected. A clear commitment validating this statement from the project sponsor needs to be included in the Final EIS.
L-003-094	Access through the project corridor is essential. The impacts of each alternative, including during construction and operation, must be evaluated and the memorandum indicates that this cannot be accomplished in appropriate detail at present due to flux in design alternatives. This indicates a necessity in the Final EIS to either provide such detail or lay out an agreed upon approach to this further evaluation and its effect on the final design of the project.
L-003-095	The noise effect statements in Appendix J must be checked with Appendix F to ensure consistency, in particular expected noise levels at north and south ends of project area (adjacent to disadvantaged housing and shelter locations).
L-003-096	Transit service is essential to disadvantaged community members and more detail is needed to ensure that transit services will not be altered such that negative effects result. The conclusion presented is noteworthy, indicating that the proposed alternatives will have substantial adverse effects on environmental justice populations due to traffic congestion and reduced mobility. These negative effects will be present for the community served as well as for staff, emergency services, and operation/maintenance of these facilities
L-003-097 Relocations Technical Memorandum	While displacement directly resulting from acquisitions does not appear to be a significant issue given the overall scale and scope of the project and the value of properties in the affected area, the DEIS is vague on actual acquisitions as well as siting of staging areas during construction (p. 145). Only two acquisitions are specifically mentioned and they are in the section on "historical resources", p.21). One is the Washington-Oregon Shippers Cooperative Association (WOSCA) freight house (location not noted) and the One Yesler Building located at the South end of Alaska Way where the Viaduct ramps up into the Stadium area. As part of the FEIS, it is recommended that more specific information be given for acquisitions including the number, location, type of facility, type of impact (industrial, commercial, residential), temporary or permanent.

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alternatives. Please see the Final EIS Appendix C, Transportation Discipline Report, for updated analysis.

L-003-054

The analysis employed makes use of standard, accepted tools and practices available to transportation planners. Travel forecasting was conducted using a version of the regional travel demand model developed by the Puget Sound Regional Council. This tool is used to estimate forecasted conditions for all major projects in the 4-county Puget Sound region. While some elements of the model are fixed (population and employment forecasts, for example), the model is not inelastic in nature. Travel choices are based on relationships between travel opportunities and costs. Hence, fewer trips are forecast in the study for reduced-capacity alternatives than for higher-capacity alternatives (see screenline tables in the Transportation Discipline Report). The traffic operations analysis is consistent with procedures and methods described in the Transportation Research Board's Highway Capacity Manual.

L-003-055

The selection of screenlines used in the traffic analysis of the Alaskan Way Viaduct Replacement Project was based on lead agency accepted locations and did take into consideration location of ramps and arterials critical to the function of SR 99 and the neighboring street and highway grid.

L-003-056

All travel demand modeling, traffic forecasts, and traffic operations analysis has been updated for the the Final EIS. The assumptions, findings and results of the analysis are presented in Appendix C, Transportation Discipline Report.

L-003-098	The greatest difference in neighborhood impacts based on the different alternatives is the amount of parking. With the Rebuild or Aerial alternatives, there will continue to be parking under and around the structure. With the Tunnel, Tunnel By-Pass, or Surface alternatives, you will lose most of the parking (p.12). For future use of a redeveloped waterfront, a public parking facility should be considered as part of the redevelopment along with improved public transportation options.
L-003-099	One lesson from the Sound Transit Project is that mitigation is limited for businesses which are not going to be acquired in whole or in part. This appears to be the case for the vast majority of the businesses and facilities along the Viaduct corridor. As a result, the FEIS should be very specific about the types of impacts and the duration of disruptions due to construction activity.
L-003-100 Public Services and Utilities Technical Memorandum	The section appears to be thorough and offers an objective, failure evaluation of potential impacts of the alternatives. No other comment.
L-003-101 P: Economics Technical Memorandum	<p>The assessment of economic impacts associated with project construction is handled responsibly within a traditional input-output framework. However, this reveals very little about the economic viability of the project itself or the relative economic importance of project alternatives. For example the same construction multiplier effects would result from an alternative project, with equivalent federal participation, regardless of the nature of the construction project and independent of its actual usefulness.</p> <p>A project that is economically important will in fact change production functions in some small way. This indicates that a formal assessment, recognizing opportunity costs and quantifying user benefits is the preferred way to estimate the economic viability of this type of project.</p> <p>The input-output analysis recognizes that only new dollars represent net contributions to the regional economy, the same perspective should be applied to the measure of sales tax impacts.</p> <p>In addition to the project capital and operating costs, the substantial economic impacts of construction will relate to the business disruption during the prolonged construction period associated with any build alternative. It was not clear that these economic impacts were formally quantified in the DEIS. Ideally, a project benefit-cost analysis would be performed at this stage in the alternative analysis.</p>

L-003-057

Thank you for your comment.

L-003-058

The alternatives presented in the 2004 Draft EIS, 2006 and 2010 Supplemental Draft EISs, and Final EIS represent a reasonable range of approaches that can meet the purpose and need for improvements. Chapter 3 describes the No Build Alternative, which is essentially the "non-operational Alaskan Way Viaduct" scenario referred to in this comment. Chapter 3 explains the lead agencies' approach to analyzing this alternative in the Final EIS.

The state legislature authorized funding to replace the Alaskan Way Viaduct in RCW 47.01.402. According to this law:

"The legislature finds that the replacement of the vulnerable state route number 99 Alaskan Way viaduct is a matter of urgency for the safety of Washington's traveling public and the needs of the transportation system in central Puget Sound."

This legislation also authorizes WSDOT to obligate \$2,800,000,000. In order to fund this obligation, the legislation further identifies sources of funding: \$2,400,000,000 of state funding and \$400,000,000 of toll funding.

In the absence of toll funding, WSDOT would still have the authorization to issue contracts up to \$2,800,000,000, but the mix of funding sources would change. It is assumed that the toll funding would be replaced by new or reprioritized federal, state, or local funding sources.

L-003-059

The alternatives analyzed in the 2004 Draft EIS focused on replacement of the existing viaduct. Mid-to-high capacity transit developments are

L-003-102	The DEIS is somewhat cursory in its discussion of impacts on businesses. In particular, greater study is needed on the variation in impacts on different business sectors. The potential impact of prolonged construction disruption on small retail business would be much greater than the impact on an industrial use, for example.
L-003-103	The DEIS notes that tourism is "the fourth largest industry for Washington State is a critical part of Seattle's economy." However, it does not investigate the potential impacts of major disruption to this industry to Seattle, especially in areas outside the immediate study area. Tourists have options and may be expected to avoid an area that is experiencing major disruption. This could have particular impact on the cruise ship industry and those who rely on the tourists that industry attracts to the city. If so, the economic reverberations could be severe on a number of levels and would presumably extend beyond the waterfront to other major attractions including Seattle Center and the Westlake retail center. The impacts of disruption to the tourism industry deserve greater study and mitigation measures should be developed to minimize disruption.
L-003-104 X: Design Variations for Surface Street	All variations appear to be relatively similar. They curiously extend beyond the Battery Street Tunnel which is now the northern limit of the project according to the description in Chapter 2. In general, more creative street design options should be explored that look at varying the priorities from roadway to parkway to transit way.

being addressed by other agencies, specifically Seattle Department of Transportation (e.g., South Lake Union Streetcar), King County Metro (e.g., RapidRide), and Sound Transit (e.g., Link Light Rail, Sounder). Potential fixed guide-way high-capacity transit (HCT) alignments that have been developed in the long-range plans for these agencies and at present do not include the SR 99/Alaskan Way Viaduct corridor.

In the south portal area, the northbound off-ramp to downtown would have a transit-only lane to accommodate buses. In the north portal area, transit lanes are included on Aurora Avenue connecting to Wall Street and Third Avenue and transit lanes on Aurora Avenue between Harrison Street and Denny Way. Refer to the Final EIS Appendix C, Transportation Discipline Report, for more details.

L-003-060

More information about pedestrian access to the waterfront for all the build alternatives can be found in the Final EIS Appendix C, Transportation Discipline Report. Effects on pedestrian facilities during construction are addressed as well. Pedestrian facilities are described in Chapter 5 and construction effects are covered in Chapter 6 of the Transportation Discipline Report.

L-003-061

The alternatives analyzed in the Final EIS did not include items other than those directly relating to replacement of the existing viaduct. High-capacity transit (HCT) developments are being addressed by other agencies, specifically Sound Transit and King County Metro. Potential HCT alignments that have been developed in the long-range plans for these agencies did not include the SR 99/Alaskan Way Viaduct corridor.

L-003-062

The Final EIS Appendix C, Transportation Discipline Report, contains an

updated illustration of the City of Seattle's designated bicycle routes. Please see Chapter 5 of the Transportation Discipline Report for updated details regarding the bicycle facilities associated with each build alternative. Chapter 6 contains details concerning the effects of construction activities on bicycle facilities. Bicycle access would be maintained at all times during construction, although at times it may be necessary to reroute bicycles using temporary facilities/detours that would be designed to minimize user inconvenience.

L-003-063

A hierarchy of views and a ranking of the relative value of views were not provided in the 2004 Draft EIS or Appendix D, the Visual Quality Technical Memorandum. The Visual Analysis Matrix in Exhibit 5-1 of Appendix D provides a numerical assessment of visual quality, but does not take into consideration viewer response. The analysis avoids providing a quantitative rating, and rather describes changes in visual character, visual quality, viewer exposure or viewer sensitivity. Impacts on views are not readily quantifiable in a manner that is assured of reflecting community consensus. The relative importance given to views is just one of many factors to be balanced by the lead agencies in the course of making design decisions. The analysis is intended to provide a consistent means of describing the differences between alternatives, but is not intended to provide a quantitative rating.

Appendix D has been revised considerably since the publication of the Draft EIS in 2004. Please refer to the updated discipline report appended to the Final EIS.

L-003-064

Views from the Washington State Ferries are discussed on page 13 of the Draft EIS Appendix D, Visual Quality Technical Memorandum. Views from the ferries are analyzed, but were excluded from visual simulations because of the viaduct's limited visual prominence from a distance

greater than the end of Piers 55-59, as is indicated in the existing conditions view in Draft EIS Appendix E, Visual Simulations Exhibit A-43. The views from the piers are discussed and provide an accurate description of the character of near views from the ferries. The views from the ferries are not described as of low value. As indicated in Draft EIS Appendix D, page 13, the views from the ferries are of the downtown skyline and the piers visible from the water. Views of the existing viaduct are partially obscured by intervening pier buildings and provide a neutral base to the prominent views of the city skyline from the ferries. The minor element of the viaduct in views from the ferries does not provide an impression of automobile dominance.

The sensitivity to views of ferry users is characterized on page 9 of the Draft EIS Appendix D, Visual Quality Technical Memorandum, in terms of viewer sensitivity based on activities, the visual context, expectations, and interests. In those terms, commuters are likely to be less sensitive to views than tourists (as indicated on page 54). The presence of tourists as a component of the viewing population is discussed for the various areas from which views are assessed, including Pioneer Square, the Central Waterfront, and the Pike Place Market area.

L-003-065

The character of the viewing population and viewer sensitivity discussion is based primarily on the typical activities of viewers. General information on viewer population is provided where available. The factors that affect viewer population in an urban context are varied and complex. Where visual quality may be a factor, it is only one of many likely factors. Other factors such as circulation patterns, destinations such as work place, cultural destinations, restaurants, services and retail stores also play a part. The project does identify the potential for attracting a larger viewer population along Alaskan Way for those alternatives that eliminate an aerial structure. Please see Appendix D, Visual Quality Discipline Report, of the Final EIS for the current visual quality discussion.

L-003-066

Visual coherence is one element of the unity of views as discussed on pages 7 to 9 of the 2004 Draft EIS Appendix D, Visual Quality Technical Memorandum. The existing viaduct does not eliminate visual coherence from views toward downtown. The viaduct does present a visual intrusion, blocks or screens views of vivid landscape features such as the Olympic Mountains or the downtown skyline, and reduces the visual coherence and compositional harmony of views. However, visual coherence of views is provided by a number of elements, not all of which are impacted by the viaduct. The general view of the downtown from the west encompasses a contrast between the water areas of Elliott Bay and the Puget Sound on one hand and the downtown skyline on the other, which together provide a compositional coherence (page 40). As indicated on page 3, the viaduct contrasts with the building character and the character of street corridors, as would the Elevated Structure Alternative.

The lead agencies disagree that the existing viaduct, or Elevated Structure Alternative, obscures the system of streets and blocks of buildings to the extent that it affects "way finding" from the waterfront to the easterly neighborhoods within the city. In addition to the viaduct, there are a variety of other elements that affect "way finding," such as the topographic break and lack of connecting vehicular streets between Spring Street and Wall Street.

Please see the revised Visual Quality Discipline Report, Appendix D of the Final EIS, for the current visual quality discussion.

L-003-067

The visual impacts analysis discusses the potential impacts of the project compared to existing visual conditions and existing public policies. The visual context of the past is not directly relevant to the discussion of direct or indirect effects of the project. The Seattle

waterfront and downtown skyline has seen much change since the 1950s, so even if the viaduct is removed, recapturing the views from that time period is not possible.

The historic context of the corridor is discussed as it relates to the visual context of designated Historic Districts and in the cumulative effects analysis for the project, found in Chapter 7 of the Final EIS.

L-003-068

In the urban context of the SR 99 corridor, the light produced by normal arterial lighting is of greater intensity and more constant than vehicle headlights. For rural unlighted highways, vehicle headlights can be a substantial source of light and glare for unlighted surroundings. For urban arterials with streetlights, the light source from headlights is generally less than the light projected from the roadway surface. In addition, the direction of vehicle lights is likely to be in the direction of travel and not toward adjacent uses, except at curves. The design of the barrier at the edge of the Elevated Structure Alternative will interrupt the beam of vehicle lights at curves and result in little or no spillover to surrounding areas. For these reasons, the discussion focuses on light and glare from roadway lighting as the appropriate measure of impact.

L-003-069

Visual quality effects during construction are described in text in Chapter 6 of the Visual Quality Discipline Report, Appendix D of the Final EIS. The type of visual impacts likely during construction would generally reflect the lack of visual coherence inherent in a site that is in the process of being built. There is little comparative value to the decision-making process in providing a matrix of visual quality impacts during construction.

Discussion of the visual effects of the tunnel operations building (which would house the vents) is in Chapter 5 of the Visual Quality Discipline Report.

Please note that for the Final EIS, the Visual Analysis Matrix is Attachment A to the Visual Quality Discipline Report.

L-003-070

Yes, the Waterfront Bicycle/Pedestrian Facility (Waterfront Trail) in Exhibit 3-4 was mislabeled 4; it should have been 5. This error translates to Map 3-5.

On page 23 of the Draft EIS Appendix D, Item 21, the Belltown Cottage Park does not include the P-Patch because the P-Patch is not a recreational facility.

On page 93 of the Draft EIS Appendix D, the text discusses the Tunnel Alternative. Yes, the reference to views north from the Alaskan Way surface street at Yesler Way should have been Visual Simulation A-22.

The flyovers shown in Visual Simulations A-23, A-33, and A-35 are of the overpass for ferry traffic located along Columbia Street connecting the Colman Dock Ferry Terminal to First Avenue as described on page 119 of the Draft EIS.

L-003-071

Direct access between the Alaskan Way surface street and the Battery Street Tunnel would not be provided under the three build alternatives evaluated in the Final EIS. Please see the Final EIS, Chapter 5 of the Appendix C, Transportation Discipline Report, for updated detailed analysis of these designs.

L-003-072

New visual simulations have been prepared for the Final EIS. Please see Appendix E, Visual Simulations, for the current simulations.

L-003-073

Vent structures as free-standing structures have been largely eliminated from the design in favor of a single tunnel operations building at each tunnel portal.

The visual simulations (provided in Appendix E) and text in the Final EIS provide a description and a graphic of the approximate height and scale of the tunnel operations buildings. The tunnel operations buildings would conform to zoning requirements.

L-003-074

Traffic-related noise increases are identified as substantial when they increase noise levels by 10 dBA in the state of Washington.

L-003-075

Predicted future operational noise levels at noise sensitive land uses are identified in Final EIS Appendix F, Noise Discipline Report.

The Final EIS Appendix F, Noise Discipline Report, evaluated operational noise levels south of South King Street and at the north end of the project. Existing and future noise levels were reported.

Noise impacts are only evaluated in areas with existing noise sensitive land uses. WSDOT and FHWA only consider mitigation measures for existing noise sensitive land uses. The waterfront area south of South King Street is an industrial area owned by the Port of Seattle. No noise-sensitive land uses currently exist in this area.

L-003-076

The lead agencies are not responsible for providing sound abatement for new development that occurs adjacent to the proposed highway project that is not already planned, designed, and programmed. Provisions of such noise abatement becomes the responsibility of private developers. Therefore, analysis of the potential effects of noise on future land uses was not conducted as part of this project.

Please see the Final EIS for the current noise analysis. For the preferred alternative, the Bored Tunnel Alternative, expected 2030 peak traffic noise levels near the south and north portals are expected to be similar to existing conditions during the facility's operation.

L-003-077

Chapter 8 of the Final EIS presents the proposed mitigation measures for project effects, including potential mitigation measures to address noise effects.

L-003-078

The development potential under all alternatives was considered in the land use evaluation; however, a quantitative analysis of this potential was not attempted. Generally, it was determined that the Bored Tunnel Alternative and Cut-and-Cover Tunnel Alternative would have the greatest potential for future development because they would provide more opportunities along the project route. The Elevated Structure Alternative would continue to provide an above-ground structure and would require a larger footprint than the existing structure. Therefore, future development opportunities in the vicinity of the central waterfront related to this alternative are expected to be more limited than those expected to occur with the tunnel alternatives.

One of the difficulties in specifying the nature of future development on parcels along the project route is the length of time required for

construction. Other activities in the project area could occur during this time and may also enhance or detract from development potential. Thus, the land use discussion generally indicates that future development is expected to be consistent with the underlying zoning of parcels in the project area, but does not speculate further about the variety of possibilities that could occur with each parcel.

Regarding the project's influence on property values, it is less certain how much impact the project would have. The Final EIS acknowledges the project's potential to affect adjacent land uses, but regarding property values, the project would be only one of many factors that may determine future market values of local properties.

Any enhancement in land values that may occur as a result of the project would likely take place after the construction period has ended. Again, because construction would be completed several years in the future, it is difficult to predict events and conditions at that time. Economic conditions are often one of the strongest influences on market values, and these conditions may vary greatly from one year to another. If, for example, the Seattle area economy continues to decline substantially as the viaduct is being replaced, completion of the project would likely have less immediate influence on the price of real estate and other goods and services. Because of all the considerations that go into the purchase of property, the Final EIS does not speculate on how the project might influence the value of land, buildings, or services in the area.

L-003-079

The City of Seattle is the lead agency for the Central Waterfront Project and one of the lead agencies for the Elliott Bay Seawall Project. As such, the project staff has been closely following and coordinating with the City's Central Waterfront Project since the waterfront planning effort was initiated in 2003. The Final EIS briefly describes both of these City

projects and indicates that the Central Waterfront Project is an independent project that complements the Bored Tunnel Alternative.

L-003-080

Chapter 2 of the Final EIS describes the project's history, explains the decision-making process that led to the development of the alternatives analyzed in the Final EIS, and describes public coordination efforts.

L-003-081

Please see Appendix G, Land Use Discipline Report, of the Final EIS for an updated discussion of applicable state, local, and regional land use plans located in the Affected Environment chapter. However, the Final EIS is meant to present existing land use conditions and the project's potential effects on land use. The document does not speculate about potential development patterns that might result from anticipated (not adopted) zoning or land use designation changes.

The Bypass Tunnel Alternative has been dropped from further consideration. Please see the Final EIS for current information on permanent parking impacts for each build alternative in Chapter 5 and the mitigation proposed to address these impacts in Chapter 8.

L-003-082

The street design that was referred to in this comment was associated with the Bypass Tunnel Alternative, which was not carried forward for further evaluation in the Final EIS.

L-003-083

Chapter 5 of the Draft EIS Appendix G, Land Use and Shorelines Technical Memorandum, presents operational impacts of the proposed project, also sometimes referred to as direct impacts. Chapter 7 of this report presents secondary and cumulative impacts, which considers

impacts from the project in combination with other projects and actions in the area. Thus, Chapter 5 acknowledges that direct impacts from operating the build alternatives are not expected to be great; however, Chapter 7 acknowledges that there may be some influences to land use as a result of the project when considered together with other actions.

While such potential future influences are not precise, Chapter 7 does indicate that during the construction period for the project in combination with other projects: "these projects will be expected to contribute noise, dust, and traffic congestion to the project area." After construction, "the proposed build alternatives could indirectly help stimulate changes in land uses for Terminal 46, where land use may differ from containerized cargo handling facility that is there today." Also, "changes in land uses may be encouraged by overall improvements associated with the new roadway."

As this chapter is describing, proposed improvements throughout downtown and the greater project area will have some influence on changes in existing land uses. Where some properties may be underdeveloped currently, new development may take place. Existing uses may be converted to different uses, in accordance with existing or proposed zoning designations. Development may be transformed from industrial or commercial uses to more office, service, or residential uses. While this is possible, it is noted that the exact type and pace of development changes downtown and elsewhere cannot be predicted because other influences, such as economic conditions, will also determine changes that may transpire.

Please see the updated Appendix G, Land Use Discipline Report, for the current land use discussion.

L-003-084

Chapter 6 of the Land Use Discipline Report (Appendix G of the Final EIS) discusses potential impacts associated with construction activities of the proposed project. This chapter acknowledges that some existing uses may change as a result of construction activities and does not presuppose that these displacements would return. It does not attempt to predict how many such changes could occur. It is possible that some uses would not survive over the length of the construction period; however, it is not known how many businesses would be affected this way.

The Economics Discipline Report, Appendix L of the Final EIS, addresses business impacts during construction of the project. Please see this appendix for updated analysis and proposed mitigation measures to address effects to businesses.

L-003-085

The parking loss analysis has been updated for the Final EIS and Appendix G, Land Use Discipline Report. Mitigation for impacts associated with potential parking losses is also discussed in the Final EIS, and in Appendix C, Transportation Discipline Report, for this project.

L-003-086

The alternatives presented in the 2004 Draft EIS represent a reasonable range of approaches that can meet the purpose and need for the project. Many options were looked at during the initial phases of the project's screening process, which involved early analysis by the project team and discussions with community groups at more than 140 community meetings and community interviews. A total of 76 initial viaduct replacement concepts and seven seawall concepts were considered, and concepts that were not feasible, or were outside the purpose of the project, were dropped from further consideration. The most workable ideas formed the alternatives analyzed in the 2004 Draft EIS. Additional

screening and analyses were conducted for the 2006 and 2010 Supplemental Draft EISs and the Final EIS.

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the other two alternatives. Extended closure of SR 99 would be more disruptive to Seattle and the Puget Sound region. Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS provide a more in-depth comparison of trade-offs for the three alternatives.

L-003-087

It is unlikely that construction would directly affect facilities in parks that are farther than one block from the construction area. The analysis of an area three to five blocks distant is likely to cover all the direct impacts.

It is not clear that displaced users of parks near the waterfront will more heavily use other parks in the city. The range of uses of recreation facilities along the waterfront is generally related to the waterfront context. Users of recreation facilities along the waterfront may choose to use other park facilities in the city, but would likely remain in the general vicinity.

Please refer to the Final EIS and Appendix H, Social Discipline Report, for current information related to how the project would affect parks. If the preferred alternative is selected, construction effects would be mostly limited to the south and north portal areas.

L-003-088

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel

Alternative and evaluated in the 2006 Supplemental Draft EIS. It was included in the project, due in part to numerous 2004 Draft EIS public comments requesting the lead agencies to consider a lid in the Pike Place/Belltown area. The proposed lid would extend north from where SR 99 emerges from the tunnel's north portal near Pine Street to Victor Steinbrueck Park near Virginia Street. The design for this lid structure with the current Cut-and-Cover Alternative is described in this Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.

Elements of the Rebuild Alternative are now included in the Elevated Structure Alternative, which does not include the lid near Victor Steinbrueck Park because of the roadway's configuration.

L-003-089

The lead agencies are aware of the concerns surrounding potential construction effects to the Seattle Aquarium. Descriptions of potential construction effects on the Seattle Aquarium and proposed mitigation measures are discussed in Appendix H, Social Discipline Report, of the Final EIS. Chapter 8 of the Final EIS also provides a summary of mitigation measures proposed for the project.

L-003-090

The purpose of the 2004 Draft EIS Appendix I, Social Resources Technical Memorandum, is to evaluate potential effects of the operation and construction of the project build alternatives on social resources. The purpose is not to comprehensively document which parcels would need to be acquired for the different build alternatives, why they would need to be acquired, the nature and severity of the effects, and/or proposed mitigation measures.

The type of information requested in this comment can be found in the following Final EIS appendices: Appendix B, Alternatives Description and

Construction Methods Discipline Report, for detailed information about why the design of the build alternatives or the proposed construction approach, methods, or activities would require the acquisition of parcels; and Appendix G, Land Use Discipline Report, for comprehensive information about the specific parcels or portions of parcels that would need to be acquired temporarily or permanently for the project build alternatives.

There has been a substantial engineering effort that has continued on the project build alternatives since the publication of the Draft EIS, and the effects of property acquisition have been substantially reduced for the build alternatives.

L-003-091

WSDOT is responsible for ensuring that mitigation for the project occurs. Considerable effort has been undertaken in the development of mitigation measures in the Final EIS and Appendix H, Social Discipline Report, to assure these concerns are addressed. There will be public outreach during construction of the project, and the proposed measures are outlined in both the Final EIS and Appendix H. The Record of Decision is the document that ultimately will commit the lead agencies to a plan of mitigation measures.

L-003-092

This Final EIS provides complete information on the project at this point, but, as this comment points out, ongoing planning and design efforts will continue to produce additional information. We are confident we have accurately described the effects of the project and that additional information will add detail but will not introduce new subjects or change conclusions.

L-003-093

The lead agencies are committed to working closely with disadvantaged communities to avoid or minimize any adverse effects. This commitment is included in the Final EIS.

L-003-094

Access throughout the project corridor will be generally maintained during construction. It is possible that some specific routes may require temporary detours depending on the construction activities. The identification of specific access modifications or detours would occur during final construction planning after final design is complete. The Final EIS contains effects of each proposed build alternative on environmental justice populations; see Chapters 5 and 6. Chapter 8 of the Final EIS presents the mitigation measures that the lead agencies will implement to address any effects to these populations.

L-003-095

Please refer to revised appendices included with this Final EIS. Both have been updated and are consistent with each other.

L-003-096

Transit will play a critical role in maintaining mobility for all populations and members of the community during construction. Please refer to the description of the construction transportation mitigation measures in the Final EIS to see how the project proposes to address potential effects to transit.

L-003-097

Since issuance of the Draft EIS, additional information on potential displacements has been provided. Full and partial acquisitions for the project were identified, and maps showing potential acquisition locations were provided in the Supplemental EIS. This information has been

updated for and included in the Final EIS. The number of potential full and partial acquisitions is identified for each build alternative, along with potential building displacements, and current uses and zoning designations for affected properties.

L-003-098

Your comment is noted. While some of the displaced parking is expected to be replaced, new parking would not be provided for every space lost. Mitigation measures for potential parking losses may include public transportation improvements and some replacement parking in, or near, the project area. Please see Appendix C, Transportation Discipline Report, of the Final EIS for a discussion of potential mitigation measures.

L-003-099

The Final EIS contains information about potential construction impacts with as much specificity that can be provided at the current design stage for the project alternatives. The potential construction durations are noted for the build alternatives. Where construction impacts are certain at specific locations, these impacts have been identified. In most instances, however, impacts at specific locations are less certain, so potential impacts are addressed more broadly. Mitigation measures are included in Chapter 8 of the Final EIS.

L-003-100

Thank you for reviewing 2004 Draft EIS Appendix O, Public Services and Utilities Technical Memorandum.

L-003-101

A cost-benefit analysis is not warranted for the project, because economics are not a direct component of the project's purpose and need. The purpose and need reflects the lead agencies' desire for a safer transportation facility that will maintain or improve mobility, accessibility,

and traffic safety. Economic viability is not the appropriate benchmark for public infrastructure projects, especially this project that has such a strong public safety component.

The level of detail requested for the economic analysis for individual businesses is beyond the scope of this impact analysis. Impacts were evaluated by separate business districts, as appropriate, that share common economic characteristics such as location; reliance on on-street, short-term parking for customers; business size; and access. Assessments of the total value of individual businesses are typically not found within publicly available information. Evaluations of an individual business' ability to continue operating during the prolonged construction period would be speculative, would rely on information that may not be able to be independently verified, and would be subject to economic forces beyond the direct control of the project. For these reasons, the economic analysis limited itself to identified business districts as the smallest division for analysis.

Please refer to the updated Economics Discipline Report, Appendix L of the Final EIS, for current methodology and analysis of economic effects for each build alternative.

L-003-102

The project team presented a summary of the business inventory of all businesses (approximately 1,200) within one block of the current SR 99 alignment (Draft EIS Appendix P, Economics Technical Memorandum). This inventory identified approximate business size, access and parking requirements, and business type. The information has been updated for the Final EIS.

The impacts to potentially fragile business districts, such as small retail businesses present in Pioneer Square and the Central Waterfront, that

rely on short-term, on-street parking to support their businesses are identified in the Final EIS Appendix L, Economics Discipline Report.

L-003-103

While it is possible that tourists may choose to avoid downtown Seattle because of a large transportation project, quantifying this possibility is speculative. However, the project can mitigate for the effects that may be a deterrent to tourists. To that end, mitigation measures to address parking and pedestrian and vehicle access effects, as well as business assistance, are discussed in Chapter 8 of the Final EIS. The operations of the cruise ship terminals, and the ability of their passengers to reach tourist attractions at the waterfront, are also addressed in the mitigation measures included in this Final EIS.

L-003-104

Dozens of surface street designs have been considered for Alaskan Way. The design plans are different for the Cut-and-Cover Tunnel and Elevated Structure Alternatives. Each includes the Alaskan Way surface street, a wide pedestrian promenade, and two sets of trolley tracks.



City of Seattle

Gregory J. Nickels, Mayor

Seattle Transportation
Grace Crunican, Director

May 27th, 2004

Ms. Allison Ray
WSDOT Environmental Coordinator
Alaskan Way Viaduct Project
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L-004-001

The Seattle Pedestrian Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the City on matters related to pedestrians and the impacts which actions by the City may have upon the pedestrian environment; and shall have the opportunity to contribute to all aspects of the City's planning processes insofar as they may relate to pedestrian safety and access.

City Council Resolution
28791

Rob Ketcherside, Chair
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Seattle, WA 98104
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Dear Ms. Ray:

The Seattle Pedestrian Advisory Board (SPAB) appreciates the opportunity to comment on the Alaskan Way Viaduct project Draft Environmental Impact Statement (DEIS). It is our conviction that the Elliott Bay waterfront holds for the City of Seattle and indeed the entire State of Washington, a tremendous opportunity to capitalize on our natural and creative resources to develop urban space that will support regional transportation needs in a way that bolsters, rather than hinders, development of community and continuity in that locale.

As such it seems appropriate to begin by reiterating the principals that SPAB has supported throughout the planning phases of this project:

- ◆ Create an excellent pedestrian facility separated from bicycle and motorized vehicular traffic along Seattle's Elliott Bay waterfront
- ◆ Landscaping, adjacency to transit and to thriving businesses are the keys to a pedestrian-oriented waterfront serving both tourists and the stakeholders of Seattle
- ◆ Improve visual access to, and the aural environment of, the waterfront
- ◆ Increase east-west connections between Cascade/South Lake Union and Uptown
- ◆ Mitigate raised portions of 99 entering Battery Street Tunnel and south of downtown by activating the space below them
- ◆ Any usage of access roads in any alignment should de-emphasize auto usage of the access roads by making them feel like pedestrian space
- ◆ Activate medians with pedestrian facilities such as transit stops and kiosks
- ◆ Incorporate Blue Ring planning concepts

SPAB also fully supports Seattle's Central Waterfront Plan and advises the project team to keep the plan's workbook in mind as the viaduct options are reviewed. Please contact Dennis Meier at DPD for a complete copy of the document.

Regarding the DEIS document, generally speaking we find it lacking in its efforts to address specific details related to the pedestrian environment. We urge that factors such as quality and character of medians and sidewalks be addressed in full and specific detail in the main body of the

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L-004-001

The design for the Alaskan Way surface street has continued to evolve as the project moves forward. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative. If the Bored Tunnel Alternative is selected, the final configuration of Alaskan Way would be determined by the Central Waterfront Project led by the City of Seattle. Please see the Final EIS for current project information.

L-004-002

forthcoming final EIS. Of equally great importance is the fact that the creation of suitable pedestrian amenities cannot fall to the wayside in the case of funding shortfalls or unforeseen costs. SPAB feels strongly that the final DEIS must clearly indicate agency responsibility and existence of funds.

L-004-003

The following are additions we see necessary to meeting the needs of the pedestrian viewpoint in this document:

L-004-004

- ◆ Construction impacts: Section 10.9 notes that new pedestrian routes will have to be established to replace the Waterfront Trail, but declines to name the new routes until the preferred alternative is chosen. Section 10.10 mentions the barrier effect the construction will have on the mindset of pedestrians, but again the DEIS is not specific about the nature of the "temporary sidewalks or other routes" mentioned. Construction will last several years and identifying the new or temporary routes is critical to the choice of alternatives.

L-004-005

- ◆ Transit impacts including alternate (trolley) transportation: SPAB would like to see a detailed plan for the re-routing of transit resources in the area. The DEIS states that route changes for buses and the trolley will occur during construction, but we believe these route changes are important and will be in place for a while, so they should be detailed.

L-004-006

- ◆ Accommodating those with Disabilities: SPAB would like to see a commitment from the project team to implementing wherever possible proven methods to augment and improve the pedestrian environment for those with disabilities. The project team has an excellent opportunity to make the Elliott Bay waterfront a premier space for pedestrians of all abilities, and while best practices guidelines may not yet exist for some innovations in pedestrian signalization, we believe such a commitment should be clearly delineated in future documents.

L-004-007

- ◆ Pedestrian Promenade Zone: It is the position of SPAB that the pedestrian area described in the surface road section of every alternative is lacking both in detail and in pedestrian orientation for a highly used downtown pedestrian corridor. SPAB urges the project to view the entire area between the edge of the right of way and the edge of the roadway as belonging to the pedestrian zone. This includes any access roads, parking, and dedicated streetcar lanes.

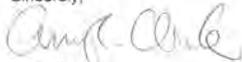
- ◆ It must be abundantly clear that pedestrians come at the top of the hierarchy in this zone, followed by transit, and vehicles. The appropriate atmosphere can be created by making the zone all one level and providing amenities to ensure that the frontage road discourages vehicle speeds over 20 miles per hour, allowing for safe and free movement of pedestrians in that area. SPAB asks that this area be addressed in significantly more detail in the final EIS.

- ◆ Crossing treatments: As the six-lane roadway proposed for the surface treatment of all alternatives creates more hazardous conditions for pedestrians than currently exist today, SPAB believes mitigation, and detailed explanation of that mitigation is essential. While the document in many instances mentions that crossings will exist, the nature of the crossings is not specified. We suggest that a raised crosswalk be used at intersections to create, in fact and in feel, a safe transition for pedestrians through the highway atmosphere into the pedestrian zone. Crossing hierarchy should be identified in the plan for the preferred alternative.

Finally, considering the enormous cost of the project, and the decade it will take to be built, SPAB strongly supports selection of an alternative that gives our city and our state the greatest value for generations to come.

Please continue to consider SPAB a resource for informed citizen opinion regarding AWVR planning.

Sincerely,



Amy Clark
Secretary
Seattle Pedestrian Advisory Board

L-004-002

The Final EIS describes the pedestrian and bicycle facilities in the south, central, and north sections of the project. These descriptions can be found in Appendix B, Alternatives Description and Construction Methods Discipline Report, and in Appendix C, Transportation Discipline Report's Chapter 5, which describes the operational impacts of the project on pedestrian access and mobility. The funding of amenities are not typically addressed in environmental review documents.

L-004-003

A variety of specific routes could be utilized for pedestrian circulation during construction. Effects to existing pedestrian facilities are discussed in the Final EIS and Appendix C, Transportation Discipline Report. A specific detailed proposal for pedestrian detour routes will be developed for the preferred alternative when the specifications for construction are finalized (this will occur after the Final EIS is published). Mitigation measures, such as signage, are proposed to help pedestrians navigate the project area during construction. Chapter 8 of the Final EIS discusses the proposed mitigation.

L-004-004

The Transportation Discipline Report of the Final EIS describes detour routes for transit services including those bus routes affected by major construction activities. The Waterfront Streetcar is not currently operating along Alaskan Way S. but could operate once again between Pioneer Square and the waterfront if a new maintenance facility can be built to replace the one that was displaced by the Seattle Art Museum's Olympic Sculpture Park. However, during construction activities, it is assumed that the service would not be operable. The final location of the streetcar will be determined by the Central Waterfront Project being led by the City of Seattle.

L-004-005

Any new pedestrian facilities, as well as all pedestrian facilities that are relocated or rebuilt during and after construction activities, will be built to the standards laid out by the Americans with Disabilities Act (ADA). The project lead agencies are committed to full restoration of the Alaskan Way surface street and surrounding area after project construction and will incorporate pedestrian-friendly and ADA-compliant designs. The final design of the waterfront will be determined by the Central Waterfront Project being led by the City of Seattle.

L-004-006

The final design of the waterfront will be determined by the Central Waterfront Project being led by the City of Seattle. However, non-motorized circulation and connectivity near the waterfront areas have been assessed in greater detail for the Final EIS. Construction plans will continue to be refined and will be intended to minimize non-motorized impacts during construction and to ultimately enhance the pedestrian and bicyclist environment in the long-term. Pedestrian mobility is a critical component for a thriving waterfront and will certainly be highlighted in the ongoing planning work.

L-004-007

The Surface Alternative is no longer being considered for implementation. The final design of the waterfront will be determined by the Central Waterfront Project being led by the City of Seattle.



REC'D JUN 01 2004

King County
Department of Natural Resources and Parks
Department of Transportation
201 South Jackson Street
Seattle, WA 98104-3856

June 1, 2004

Ms. Allison Ray
WSDOT Environmental Coordinator
Alaskan Way Viaduct Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Ray:

Thank you for the opportunity to comment on the draft Environmental Impact Statement (EIS) for the Alaskan Way Viaduct (Viaduct) project. This letter details comments from King County's Department of Transportation (KCDOT) and Department of Natural Resources and Parks (DNRP), Wastewater Treatment Division. Some of our concerns are highlighted below; more detail is provided in the full comments, found in the attachments to this letter.

First, we would like to compliment you on the work invested in making the draft EIS readable and comprehensible. The extra effort to use plain language instead of jargon and the question-and-answer format make the document far more usable than other impact statements we have reviewed. We hope this approach will become the standard for future impact statements.

L-005-001 | **Transportation**

KCDOT is concerned about construction and operational impacts to downtown transit access, the Waterfront Streetcar, Paratransit, pedestrian access, and freight mobility. Among our concerns are the following:

- Once the preferred alternative is selected, significantly greater analysis and design detail will be needed to identify transit access routes and associated improvements, and transit enhancements and mitigation for each stage of construction. KCDOT is particularly interested in helping identify downtown transit access routes and related transit priority improvements, and a construction mitigation strategy, including measures to maximize transit ridership and to minimize transit delay.

- The draft EIS states the transit mode share will double by 2030. The forecasts emphasize the importance transit must continue to play in the corridor and in downtown Seattle. If the forecast mode split is not achieved, traffic levels and parking needs will be greater than

L-005-001

Thank you for your comment regarding agency coordination. Since publication of the Draft EIS in 2004, substantial progress was made on further defining the construction approach and detailed staging plans for the Alaskan Way Viaduct Replacement Project. Concurrently, transportation management plans for the construction period have advanced as well. The project team worked with King County Metro and other public transit operators to develop and assess proposed transit elements for the construction period. These include speed and reliability projects, service enhancements, and service maintenance proposals. Proposed actions are consistent with King County Metro's Transit Blueprint and also take into account the passage of Transit Now.

L-005-002

The project recognizes the importance, from a regional perspective, of supporting and encouraging increased use of transit services. While growth in transit mode share is anticipated in the region and in downtown Seattle, more recent travel demand forecasts estimate that it will not be as high as what was reported in the Draft EIS. The travel demand forecasting model used for the Draft EIS to develop forecasts for the year 2030 overestimated the mode shift that could occur in that time-frame. The travel demand forecasting model was updated for the Final EIS (Chapter 8, Section 4 – How would regional travel patterns compare?) and now reflects a more likely growth trend in transit mode share for the year 2030.

With respect to the SR 99 corridor, all of the build alternatives provide enough capacity to accommodate projected growth out to at least 2030.

- L-005-002** | estimated, or downtown growth will have to be more modest. Special attention will need to be focused on transit if it is to play the important role assumed in the environmental analysis.
- L-005-003** | • Of major concern is accessibility for pedestrians and the disabled during and after construction. It is likely any project alternative selected will have significant effects on movement within and around the downtown. Access to transit and services under the Americans with Disabilities Act will need to be carefully considered and maintained during construction, in particular. Similarly, facilities for pedestrian movement and access to services will need to be implemented after construction is complete.
- L-005-004** | • The impact to freight and goods transport to and from the Ballard/Interbay Manufacturing and Industrial Center (BINMIC) under the Tunnel and Bypass Tunnel alternatives needs to be fully explored. The option to connect SR 99 or the Alaskan Way surface roadway to the Western/Elliott corridor should be seriously considered, especially if the Broad Street underpass is not constructed.

Please contact Rob Fellows at (206) 684-1449 if you have any questions regarding KCDOT comments.

L-005-005 | **Wastewater Treatment Division**

The Wastewater Treatment Division (WTD) notes that all the project alternatives include a stormwater management approach relying substantially on King County wastewater facilities for conveyance, treatment and discharge.

This stormwater management alternative is problematic from technical, policy and permitting perspectives. In particular, the WTD offers the following observations:

- Introducing a new source of stormwater to the King County system, as proposed by the Convey and Treat Approach, would constitute a reversal of longstanding King County [and City of Seattle] policies. Founded on the fact that stormwater dilutes wastewater and causes variations in flow that can reduce the effectiveness of wastewater treatment, Seattle and King County spent hundreds of millions of dollars over the past 40 years, and will spend hundreds of millions more in the future to control Combined Sewer Outflows (CSOs). Adding additional stormwater into the system is not consistent with current policy.
- The water quality appendix to the draft EIS shows the Best Management Practices (BMP) Approach to stormwater management to be slightly more effective for pollutant removal than conveying and treating via King County facilities. This viable approach does not require variances or cause adverse impacts to King County facilities. The only obvious and substantive effect of the Convey and Treat Approach is to shift the locations where facility pollutants are discharged from the City's stormwater outfalls on the waterfront to King County's Denny Way and Royal Brougham CSO treatment plants. Mass loadings of pollutants are not substantially affected.
- The draft EIS identifies a treatment technology: ballasted sedimentation, for the future Royal Brougham CSO treatment plant and predicts the resulting quality of the discharge, including stormwater from the SR 99 project. The impact statement does not substantiate its conclusions that ballasted sedimentation would achieve the stated level of pollutant removals.

L-005-003

Pedestrian access will be maintained at all times during construction activities. At times, it will be necessary to reroute pedestrians using temporary facilities/detours, but these detours will be designed to minimize any inconvenience. Wayfinding systems will also be installed to facilitate pedestrian access in and near the project construction area.

Any pedestrian facility (e.g., sidewalk, bridge, path, etc.) that may be removed to accommodate construction activities will be replaced with a temporary facility in a nearby location. All pedestrian facilities that are relocated or rebuilt during and after construction activities will be built to the standards laid out by the Americans with Disabilities Act (ADA).

L-005-004

The effects on freight and goods transport to and from the BINMIC and connections to the Elliott and Western Avenue corridor is addressed in the Final EIS Appendix C, Transportation Discipline Report.

Throughout the project development process, the lead agencies (FHWA, WSDOT, and the City of Seattle) have been working with the freight community to understand and account for their needs under all of the proposed alternatives.

L-005-005

The Royal Brougham CSO Treatment Facility is no longer proposed for any of the alternatives. As a result, the Royal Brougham (Connecticut) outfall will not be modified.

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final

L-005-005

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Thus, water quality impacts in the draft EIS may be understated. Furthermore, analysis in the draft EIS does not support its conclusion that a new outfall will not be required at Royal Brougham; the final EIS should either provide such conclusive analysis or address the impacts of constructing a new outfall at that location.

- The Denny Way CSO treatment plant will come on line in 2005. It was not designed to receive stormwater from the SR 99 project; the added water from SR 99 will change the loading and efficiency of the new Denny Way facilities. The draft EIS does not provide sufficient information to conclude that the Denny Way facility would be able to meet its permit limits with the additional stormwater flows. More analysis is required in order to know whether or not this would cause a significant adverse impact to water quality at Denny Way or to the sediments surrounding the outfalls. (The volume of the one untreated overflow per year at Denny Way could increase significantly under the Convey and Treat Approach.) Additional Denny Way facilities required to accommodate the SR 99 stormwater should be identified and impacts addressed.

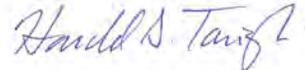
WTD believes a viable approach that does not require variances from policies and codes or cause adverse impacts to King County facilities can be identified. Some added hydraulic and water quality analysis is needed to supplement information in the draft EIS in order to conclude that all probable significant adverse impacts are identified. Based on the information available at present, WTD supports the BMP Approach. Please contact Karen Huber, Water Quality Engineer, at 206-684-1246 to discuss WTD's comments and to coordinate assumptions for additional analysis.

Our departments look forward to working collaboratively with the lead agencies to add detail to the preferred alternative as we move forward into the final EIS.

Sincerely,



Pam Bissonnette, Director
King County Department
of Natural Resources and Parks



Harold S. Taniguchi, Director
King County Department
of Transportation

Attachments

EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS.

**Attachment 1:
King County Department of Transportation**

Comments on

SR 99: Alaskan Way Viaduct & Seawall Replacement Project Draft EIS

June 1, 2004

L-005-006

Transit Access to Downtown Seattle from the South

Currently, several bus routes from West Seattle and the SR 509 corridor enter the downtown area from the Viaduct at the Seneca Street exit, and leave downtown using the Columbia Street exit. Assuming that the Monorail is completed to West Seattle, many of those routes would be eliminated and replaced by monorail service. However, there will still be service from the south entering the downtown area on the Viaduct. In the Tunnel and Bypass Tunnel alternatives, the Seneca and Columbia Street ramps will be eliminated. More detail is required to determine how transit will enter the downtown area, and what improvements will be needed to minimize delays. It will be important to have more than one feasible transit route through the area, especially to avoid congestion during special events in the stadium area.

L-005-007

Our options would be to enter the downtown at SR 519, or to use the ramps in the vicinity of South King Street. Significant analysis is needed to determine the ridership and accessibility impacts of different access routes, relative travel times, and transit priority measures that would be applied to operate transit reliably through anticipated bottlenecks and long signal cycles near ramps. We look forward to assisting in this effort, but will require assistance from the Viaduct project.

L-005-008

The most likely transit routing from the Viaduct to downtown Seattle from the South is to exit and enter the facility at SR 519. Different interchange configurations are shown for this area, and the text explains that these maybe able to be mixed and matched between alternatives. All of the options bring traffic into at-grade intersections at 1st Avenue South with South Atlantic Street and South Royal Brougham Way. Transit will most likely use South Atlantic Street in both directions to reach the 4th Avenue South corridor unless future phases of the SR 519 project are completed. It will be important to be able to enter and exit SR 99 from South Atlantic Street rather than to have to turn right on 1st Avenue South and left on South Royal Brougham Way to enter the freeway southbound as is shown for the Aerial alternative.

The intersection at 1st Avenue South and South Atlantic Street will be more congested than today, since it will be the terminus for ramps to SR 99, I-5 and I-90. For transit service to function effectively through the area, transit priority treatment(s) will likely be

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L-005-006

The project team recognizes the importance of providing transit access to downtown from SR 99. Section 5.5.1 of the Final EIS Appendix C, Transportation Discipline Report, identifies transit connections that would be provided under each of the Alaskan Way Viaduct Replacement Project alternatives. The functionality of the transit connections under each alternative is also called out in this section. Section 5.5.4 of the Transportation Discipline Report documents the evaluation results for potential effects of the build alternatives on transit travel time.

Under alternatives that replace the Columbia and Seneca ramps with access at King Street, there are several different possibilities for routing transit into the downtown area. Also, transit speed and reliability improvements that would be provided to mitigate construction impacts would still be available when the project is completed. These improvements are supported by the project.

L-005-007

Any effects on transit ridership would likely have to consider constraints (additional travel time) and opportunities (increased service coverage) that could occur as a result of alternate access routes. Please see the Final EIS Transportation Discipline Report, Appendix C, for updated analyses for the project build alternatives.

Note that access to and from the south directly to SR 519 is no longer proposed for any alternative. Under the preferred alternative (Bored Tunnel Alternative), access would be provided at locations in the stadium area. Transit access would be supported by a bus-only ramp for northbound travel on SR 99 between S. Holgate Street and S. Royal Brougham Way.

Additional King County Metro transit service will be provided as part of construction mitigation. Improvements to the speed and reliability of

L-005-008

needed. Bus stop facility changes may also be needed. The full requirements for transit downtown access should be identified in the Final EIS.

Transit Access to Downtown Seattle from the North

L-005-009

Southbound transit service from the SR 99 corridor enters the downtown area at Broad Street. Route 16 exits at Valley Street to serve the Seattle Center. Northbound buses follow Dexter Avenue North and use John Street to access SR 99. Route 16 uses Mercer Street to Dexter Avenue North, and enters SR 99 from Valley Street. Buses do not use the Denny Way northbound entrance because it is not currently possible to locate a bus stop on or at Denny Way.

In all of the alternatives, southbound traffic using the Denny Way exit will increase due to the closure of the Broad Street exit. The intersection of Denny Way and Battery Street where the SR 99 ramp terminates is a major bottleneck for transit today, and will be more of a barrier in the future unless mitigated. It will be important to maintain a southbound bus stop in the vicinity.

Northbound, Metro would like to be able to access SR 99 from the Denny Way entrance, but that would require identifying a suitable location for a northbound bus stop in the vicinity of the Denny/Battery intersection. However, we are concerned that removal of the Mercer Street off-ramp will result in tunnel traffic weaving sharply across traffic entering from the Denny Way ramp to make right turns to local streets in order to reach Mercer Street.

There is much work needed still to identify the route(s) transit will use to enter and exit SR 99 north of downtown Seattle, to determine how transit will move safely through anticipated bottlenecks, and to identify changes to bus stops and other facility improvements. Facilities and treatments required to accommodate transit operations and minimize transit delay on access routes to the downtown should be developed for the preferred alternative and included in the Final EIS.

L-005-010

Downtown Seattle Access to and from Bus Bases and Bus Staging Areas

There are three transit operations bases in the vicinity of the SR 519 access ramps at 4th Avenue South and South Atlantic Street at which buses are stored, maintained and deployed daily. Buses deployed from the bases travel north through downtown providing revenue services to north, northwest, northeast and east Seattle destinations. Base deployed buses also travel north through downtown to stage in the Denny Regrade prior to beginning service routes with destinations to the south, southeast, southwest and central Seattle destinations.

Additionally, buses operating Seattle, eastside and regional services, including Community and Sound Transit routes, travel to and from downtown to stage or layover at either on- or off-street locations in the southern, central and northern parts of the downtown. Transit access, for both revenue and non-revenue services, is critical for cost effective, on-time transit performance.

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transit service will also be supported by the project and continue to be in place after construction is completed. While some added travel time would be incurred by buses under the Bored Tunnel Alternative, transit operations would still be maintained. However, transit service enhancements are expected in downtown Seattle; for example, Sound Transit light rail and commuter rail expansion under Sound Transit 2 and the King County Metro RapidRide bus program.

L-005-008

For the Final EIS, access directly to SR 519 is no longer proposed to/from the south on SR 99. Instead, access would be maintained at the Columbia and Seneca Street ramps (for the Elevated Structure Alternative) or ramps in the stadiums area (for the tunnel alternatives). Under the Bored Tunnel Alternative, transit access would be supported by a bus-only ramp for northbound travel on SR 99 between S. Holgate Street and S. Royal Brougham Way. The Final EIS reflects the updated analyses for the project alternatives.

L-005-009

Under the Bored Tunnel Alternative, transit vehicles would use the new SR 99 center lane on- and off-ramps at Harrison Street. In the northbound direction, transit vehicles entering SR 99 would serve zones along Aurora Avenue. As part of the project, transit lanes on SR 99 between Harrison Street and Denny Way and along Battery and Wall Streets would provide continuous exclusive bus treatment from Third Avenue to SR 99 in the South Lake Union area. The project would also include new east-west street connections in the north end, thereby enhancing pedestrian access to transit service.

L-005-010

The Transportation Discipline Report, Appendix C of the Final EIS, includes results of traffic operations assessments relating to each

L-005-011

Construction Impacts to Transit Operation

Impacts on transit during construction are of two types: those that affect transit demand, passenger accessibility and service requirements, and those that affect the speed and reliability of transit operations.

Transit demand will be impacted by how competitive transit speeds are versus how much traffic flow and accessibility is reduced. Providing enough service to meet demand during construction will be a primary interest for Metro. Presumably a significant portion of any increase in transit demand will be met through the addition of monorail service in some of the affected areas. Viaduct construction will likely have a significant impact on auto access throughout the downtown area. Demand for transit service will likely increase; additionally, transit service efficiency will decrease for routes in the congested downtown service area.

There is little detail available in the draft EIS about how transit operations and facilities will be affected by construction. This will be an especially critical issue if construction plans are changed to require complete closure of the Viaduct for an extended period. While transit does not use the central portion of the Viaduct, closure of the Viaduct would increase traffic substantially on downtown streets, causing delays and perhaps severe cost increases for all transit service operating through the core of downtown. At the same time, transit will be called on to play a more significant role maintaining access to the downtown. Maintaining access to downtown affects not only the delivery of revenue services, but also the ability for non-revenue services to travel efficiently between route terminals located inside and outside of the downtown areas and bus staging areas located in north, central and south downtown areas. Increases in transit service result in increased in layover requirements (more surface transit traffic, more potential for delay and more cost increase).

Once a preferred alternative is chosen, we look forward to working closely with WSDOT to identify transit routes, facilities improvements, priority treatments and other mitigation to keep transit moving through each phase of the construction process, and to document those steps in the final EIS.

L-005-012

It is also unclear what the construction impact of widening the Mercer Street underpass will be. Similarly, the construction impacts of lowering Aurora Avenue North of the Battery Street tunnel are not stated. If Aurora Ave North must be completely closed for even brief periods, the impact on transit would be severe, and an extensive mitigation plan would be needed.

L-005-013

The Waterfront Streetcar will be taken out of service during construction under all alternatives. It is not clear whether replacement service will be needed, or whether a transit shuttle will be needed to cater to construction workers.

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alternative. For the alternatives carried forward to the Final EIS, travel times and intersection operations affecting transit service were identified. Differences in traffic operations for these alternatives are largely confined to the areas immediately adjacent to the corridor.

WSDOT and partner agencies have or will implement several strategies to keep traffic moving during construction. 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. WSDOT will prepare a traffic management plan, which will contain localized traffic mitigation measures. These measures will be developed as construction details are refined. Please see the Final EIS, Appendix C, Chapter 6 of the Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

L-005-011

The project concurs with King County that major construction of the replacement of the Alaskan Way Viaduct would both directly and indirectly affect transit operations in downtown Seattle and the major travel corridors serving the downtown area.

In cooperation with King County Metro and other agencies, the project includes a set of actions aimed at managing mobility and reducing travel impacts associated with construction of the project. Many of these strategies help improve street-level transit operations through priority treatments such as preferential signal timing, queue by-pass lanes, transit only and business and transit access lanes and others. The project also will provide support for added bus service levels to accommodate potential higher demand levels during construction. Mitigation measures are included in Chapter 8 of the Final EIS.

L-005-014 | Where will routes 16 and 66, now serving Colman Dock, be rerouted to? How will ferry pedestrian passengers gain access across the construction to transit service traveling on downtown avenues parallel to Alaskan Way?

L-005-015 | It will be critical to the economic health of downtown Seattle to maintain access to the downtown during the extended construction period contemplated. We are encouraged by the project's commitment to providing investments to reduce single-occupant vehicle use and to increase other modes during construction. We are looking forward to working with the lead agencies to further define those investments, both to maximize transit use, and to minimize increases in operating costs, delays and disruptions to transit service during the construction period.

L-005-016 | **Impacts of the Surface Alternative**
We believe that the Surface option would have a detrimental effect on the operation of transit services throughout downtown Seattle. Additional discussion of impacts on parallel surface streets, e.g., expansion of First Avenue South from two to four lanes, is sorely missing from the document. Such impacts are likely to be equally critical to the downtown function as those on Alaskan Way itself.

The Surface alternative would reduce the capacity of the Viaduct roughly in half, due to the addition of signalized intersections in the current controlled access freeway section along the Seattle waterfront. While some of the Viaduct users would cease to make trips within the study area, the majority would shift to I-5 and downtown streets. The analysis shows that many more intersections on First and Second avenues would be severely congested under this alternative, but it does not assess how slowed traffic would impact transit speeds or operating costs. Moreover, the traffic analysis considers only the impacts to First and Second avenues. It is likely that all of the north-south streets in the downtown would be affected, greatly increasing transit operating-costs while reducing ridership. If this alternative is carried forward, the full impact on transit operation in the downtown area should be assessed, and a mitigation plan will be needed to maintain reliable transit speeds and minimize increases to transit operating costs.

L-005-017 | **Waterfront Streetcar**
Surface street designs are not finalized for any of the alternatives. The Metro Transit Division looks forward to working with the Viaduct design team to ensure that the functional and design requirements of the Waterfront Streetcar are incorporated into final design plans. In the future a continuous double-track configuration will be required to allow more flexible and frequent service. King County and the City of Seattle are working to identify future streetcar needs including options to move the maintenance shop from its current location at the future Sculpture Park. Active coordination is needed to incorporate these into final Viaduct plans.

L-005-018 | **Flexible Transportation Plan**
Mitigation for viaduct construction includes implementation of a Flexible Transportation Package. Many elements have been identified for consideration in the final package,

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L-005-012

Construction impacts to the area north of the Battery Street Tunnel have been evaluated in more detail since the Draft EIS was issued. Please refer to Chapter 6, Construction Effects and Mitigation in the Final EIS Appendix C, Transportation Discipline Report.

L-005-013

The waterfront streetcar service is not currently in service, and it is assumed that it will not be operable along the central waterfront during construction. The final location of the streetcar will be determined by the Central Waterfront Project being led by the City of Seattle.

L-005-014

Transit and pedestrian access to Colman Dock will be maintained during construction.

The final design and construction of the waterfront will be determined by the Central Waterfront Project being led by the City of Seattle.

L-005-015

We look forward to continued coordination with King County.

L-005-016

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Surface Alternative. As explained in the 2010 Supplemental Draft EIS and the Final EIS, the Surface Alternative does not meet the project's purpose and need to provide capacity to and through downtown Seattle. Because the project has evolved since comments were submitted in 2004 and 2006, please refer to the Final EIS for current information.

L-005-018

affecting a wide variety of travel options and barriers to using alternative transportation. We look forward to working with lead agencies on preparation of the final Flexible Transportation Package for the FEIS, and working on implementation of the program elements during the project. The Market Development section can provide assistance estimating budgets and program costs, and developing implementation plans and outreach strategies.

Reference is made several times to budget for the Flexible Transportation Package, but no breakdown of the budget was found. Once the preferred alternative is selected, it will be important to develop the implementation details for this package, including the length of time each element of the mitigation program will be funded.

One potential Flexible Transportation Program element is an expansion of the Metro's FlexPass program. This is envisioned as providing more attractive incentives to encourage downtown Seattle employers to offer this program to their employees. This element should be broadened to include "FlexPass or other fare media." The FlexPass program may undergo significant changes with the advent of Smartcard, which may lead to other fare programs more applicable to a broader range of employers than FlexPass by the time viaduct construction occurs.

An additional item that should be considered in the Flexible Transportation Program is "enhancing work option programs." Work option programs include support for telework and instituting flexible work hours for employees. Including support for helping employers implement work options programs may be a fairly low-cost and effective component in the mitigation package for the overall project.

A key element in achieving the mode split shown in the draft EIS analysis will be effective management of the price and supply of commuter parking. Again, we look forward to working with the lead agencies to identify and implement parking mitigation strategies consistent with the Flexible Transportation Package objectives.

L-005-019

Accessibility Issues

Regardless of the preferred alternative, it will be important to have an ADA compliant, accessible (elevated) pathway constructed near Colman Dock (the current crossover is too steep to be accessible) and near the University Steps (since that location lacks a 24-hour public access elevator) in order to connect the waterfront with 1st Avenue. Also consider providing an accessible path at street level from the waterfront to 1st Avenue along the entire area between Pioneer Square and Pike Place Market (current sidewalks have extreme cross-slope, the sidewalks/crosswalks are in poor condition, and some curb ramps are poorly installed).

Once the preferred alternative is chosen, plans should be developed to maintain and/or provide accessible pathways throughout each phase of construction. This should be integrated into plans for general access during construction.

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L-005-017

With the Bored Tunnel Alternative, the final location of the streetcar will be determined by the Central Waterfront Project led by the City of Seattle. Both the Cut-and-Cover Tunnel Alternative and the Elevated Structure Alternative include the streetcar along Alaskan Way. The development of the final design plans would include participation by King County Metro.

L-005-018

Since the Draft EIS was published in 2004, transportation planning efforts for the construction period have greatly expanded upon the ideas introduced in the Flexible Transportation Package. Strategies proposed and described in the Final EIS are intended to help mitigate increased congestion, particularly during project construction, as well as provide and support alternative means of travel. Refer to Chapter 8, Mitigation of the Final EIS for details.

L-005-019

Pedestrian access will be maintained at all times during construction activities. At times, it will be necessary to reroute pedestrians using temporary facilities/detours, but these detours will be designed to minimize inconvenience. Any pedestrian facility (e.g., sidewalk, bridge, path, etc.) that may be removed to accommodate construction activities will be replaced with a temporary facility in a nearby location. All pedestrian facilities that are relocated or rebuilt during and after construction activities will be built to the standards laid out by ADA.

Final configuration of on-street parking locations and configuration along the waterfront will be addressed in the Central Waterfront Project led by the City of Seattle.

Efforts will be made to ensure that Access vehicles will have reasonable access to important stop areas near the project construction zone, such

L-005-019

Regarding accessible parking, final design should reflect the current requirement that disability spaces be further inset to allow drivers to exit the driver-side of a vehicle and not be in traffic flow. The small number of accessible parking spaces that Seattle provides under the Viaduct should be replaced in a convenient location. Parking charts in the final EIS should document existing accessible spaces and curb ramps. The final EIS should include a plan for the maintenance or relocation of those spaces and ramps both during construction and in the long-term.

Metro *Access* Transportation service should be considered in future discussions of transit needs. *Access* has approximately thirty pick-ups and thirty drop-offs per month at Colman Dock. The proposed shuttle alternative service may not provide an appropriate level of service (depending on the routing), and *Access* may still need access to Colman Dock.

In 2003, *Access* provided over a million passenger trips throughout King County with a fleet of 280 vehicles. In April 2004, *Access* provided 138 passenger trips per weekday to origins or destinations in the greater downtown area. Based on this ridership, 100 *Access* vehicles enter and leave downtown each weekday. In addition, an undetermined number of *Access* vehicles use Interstate 5 or the Viaduct to travel through downtown on their way to or from non-downtown destinations.

A subset of the downtown trips includes approximately 30 pick-ups and 30 drop-offs per month at Colman Dock. The proposed shuttle alternative service may not provide an appropriate level of service (depending on the routing) and *Access* may still need to reach Colman Dock.

As *Access* service is contracted out, delays in reaching destinations in the downtown or in bypassing downtown caused by construction, relocated access points or increased traffic could result in additional operating costs. Contractors are paid by "vehicle service hour" so delays could result in added service hours for the same or added vehicles. Once a preferred alternative is selected, it may be possible to approximate any increased costs using estimated travel speeds.

Since eligibility for *Access* includes an inability to travel to or from a bus stop or other boarding location, construction impacts on pedestrians with disabilities could result in an increased number of eligible riders and, therefore, an increased number of trips. The final EIS should consider these and other foreseeable impacts to the Seattle's disabled population.

L-005-020

Freight and Goods Movement

The Viaduct corridor is the freight lifeline for businesses located in the Ballard/Interbay Manufacturing and Industrial Center (BINMIC). Businesses in this area access points south of the Seattle downtown, including I-5 and major freight routes, using 15th Avenue West, Western and Elliott avenues, and the Viaduct corridor.

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as Colman Dock. Construction mitigation measures will be further developed as part of the construction transportation management plan that is developed as construction plans evolve.

L-005-020

The Bored Tunnel Alternative (preferred alternative) does not retain access to the Elliott and Western Avenue ramps. Access for the BINMIC area to the SODO industrial area and other industrial areas south of downtown could be made via Alaskan Way (via Broad Street), I-5, and Mercer Street to the Republican Street access ramps to SR 99 bored tunnel. Trucks carrying flammable or hazardous materials would not have access to the tunnel and would have to remain on surface streets. Analysis of these routing options can be found in the Final EIS Appendix C, Transportation Discipline Report.

L-005-020

The Tunnel and Bypass alternatives do not provide for this functional connection because ramps to the Elliott and Western corridor are not provided. Instead, traffic headed to the BINMIC area is routed along the waterfront on Alaskan Way, crossing the BNSF railroad at Broad Street to reach Western and Elliott Avenues. The Broad Street crossing can be blocked for long periods of time by freight trains. This causes extensive backups today, and if all traffic headed to the BINMIC area must use Alaskan Way the backups at this at-grade crossing may be intolerable.

King County believes that the better approach is to retain the Western/Elliott ramps in the Tunnel alternative, and to construct an arterial connection from Alaskan Way to the Western/Elliott corridor for the Bypass Tunnel alternative, especially if the proposed Broad Street underpass is removed from consideration. Before discarding these design options, we believe an analysis of the impacts of road/rail conflicts at Broad Street should be conducted, and economic analysis of the potential displacements to BINMIC area businesses must be carried out if a fast and safe freight link cannot be provided into and out of the area.

L-005-021

Cumulative Impacts

The impacts on transit and freight discussed elsewhere in this letter could be far more significant if the Viaduct project is constructed at the same time as other disruptive projects in the same area. It will be important to reassess the cumulative impacts and mitigation needed for multiple public and private projects likely to interact with the Viaduct project as the project nears the implementation stage and the time frame for these projects becomes more definite.

L-005-021

Comment noted. Please see the Final EIS, Chapter 7, for the current discussion on cumulative effects for the project.

**Attachment 2:
King County Wastewater Treatment Division**

Comments on

SR 99: Alaskan Way Viaduct & Seawall Replacement Project Draft EIS

June 1, 2004

The Wastewater Treatment Division of the King County Department of Natural Resources and Parks is providing the comments below in response to the *SR 99: Alaskan Way Viaduct & Seawall Replacement Project Draft Environmental Impact Statement (EIS)*. We begin with a summary discussion of King County's concerns. This is followed by more detailed comments organized by topic. Under each topic, specific sections or pages in the draft EIS or appendices are referenced, when appropriate.

General Comments

L-005-022

The Alaskan Way Viaduct and Seawall Replacement Project would result in improved water quality along the Seattle waterfront. The two proposed stormwater management approaches differ, however, in the level of improvements to water quality as well as in consistency with adopted policies, the impacts to the effectiveness of King County's wastewater facilities, and the level of responsibility, cost, and liability that King County and the region's rate payers would incur in managing the system.

The BMP Approach would maintain stormwater discharges at their current locations but provide treatment. The Convey and Treat Approach, however, would change the way stormwater is managed along the waterfront. Currently, stormwater in many areas is collected separately from wastewater and is discharged directly into Elliott Bay. The Convey and Treat Approach would capture stormwater, put it into the combined sewer system with sanitary sewage, and split the flow between King County's West Point Treatment Plant, the soon-to-be-completed Denny Way Combined Sewer Overflow (CSO) Treatment Plant, and the proposed Royal Brougham CSO Treatment Plant. This approach would shift the pollutant load primarily to the north and south of the waterfront. In addition, the solids and associated pollutants removed from the stormwater at the West Point Treatment Plant would be incorporated into biosolids for use in agriculture or forestry. By changing the way stormwater is managed, the Convey and Treat Approach would shift operating costs and responsibility and any environmental liabilities from the City of Seattle to King County without providing any environmental benefit over the BMP Approach.

The draft EIS indicates that the BMP Approach would reduce pollution along the central waterfront more effectively than the Convey and Treat Approach. The draft EIS states that the BMP Approach would reduce the amount of pollutants discharged by approximately 85

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The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS.

L-005-022

percent, and the Convey and Treat Approach would reduce the amount of pollutants by approximately 80 percent. However, it is uncertain whether either approach can consistently achieve the stated percent removal in practice.

King County's greatest concern is that the Convey and Treat Approach would conflict with existing State and County policies that prohibit the introduction of new stormwater sources into the sewer system. When stormwater enters the wastewater system, the resulting dilution and variable rate of flow reduces the effectiveness of wastewater treatment facilities. The viewpoint that the impacts of stormwater on wastewater systems should be minimized has led the City of Seattle to spend \$480 million and King County to spend \$350 million over the last 40 years in CSO control programs. King County is committed to spending another \$370 million and the City of Seattle has committed to spending another \$90-\$110 million on CSO control in the future.

In addition to making CSO control a priority, King County and the agencies it serves currently are engaged in a large effort to reduce the amount of comparatively clean water that enters the sewers through infiltration and inflow. The Convey and Treat Approach would directly conflict with that goal.

A major issue for King County is the large impact that the Convey and Treat Approach would have on the Denny Way CSO facility, a joint King County/City of Seattle CSO control project that is not yet in operation. The facility has been designed and constructed to treat up to 250 million gallons per day of flow during peak flow events. Under the Convey and Treat Approach, the City of Seattle would send a substantially greater volume of flow than the facility was designed to accept. This would change the parameters of the designed treatment process and would significantly affect the facility's performance and ability to meet regulatory requirements.

King County is not desirous of taking on the additional cost and liability that would result from the Convey and Treat Approach, especially since the BMP Approach is a viable alternative for managing stormwater. The BMP Approach would be consistent with adopted policies; it would not require variances from regulations; and it would not cause adverse impacts to King County facilities. We hope that any approach that would discharge stormwater to the sewer system will be eliminated from further consideration.

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System Description

King County is providing the attached figure, which shows existing King County wastewater facilities superimposed on a map of the viaduct/seawall project area. Also attached is a table showing King County wastewater facilities within the construction area for the Tunnel Alternative. We also are providing the following comments on Appendices O and S to clarify the description of the existing stormwater and combined sewer collection system:

L-005-023 *Appendix O: Public Services and Utilities Technical Memorandum*

Page 71, Section 5.1.3: In the subsection titled "Major Combined Sewer Interceptors," please note that the Lake Union Tunnel, South Hanford Street Regulator, and Denny Way Regulator should not be affected during construction. Also, the Lake Union Tunnel begins at Terry Avenue North and Republican Street (Manhole W10-129A).

Page 72, Section 5.1.3: The subsection titled "Outfalls and Drainage System" states, "Almost all storm water in the AWW Corridor ultimately drains into Puget Sound." King County believes that this statement should be clarified. By far the majority of the "800 storm drainage, combined and sanitary sewer manholes within the study area" are either combined or sanitary sewer manholes. Stormwater flowing through these manholes is transported either to the West Point Treatment Plant where it is treated and then discharged directly to Puget Sound, or it is discharged through City of Seattle and King County outfalls as combined sewage into Elliot Bay. The stormwater discharged to Elliott Bay is ultimately transported by currents to Puget Sound.

L-005-024 *Appendix S: Water Resources Disciplines Report*

Page 11: The following statement greatly oversimplifies the combined sewer system, creating a misimpression of management effectiveness:

2. They collect stormwater and convey it to the City's combined sewer system, and then on to the County's combined system and the West Point Treatment Plant.

The pipes convey flows to four potential places: City of Seattle CSOs, King County CSOs, the King County Denny Way CSO facility, or the West Point Treatment Plant. It is likely that West Point receives less than half the stormwater.

Pages 15 and 17, Exhibits 3-3 and 3-4: The legend and footnote 1 in each figure refers to a "diversion structure." Which diversion structure is this?

Page 22, paragraph 3: The description of the King County Wastewater Service Area is not entirely accurate. The actual service area extends north into Snohomish County to include portions of the Alderwood, Brier, Cross Valley, and Silver Lake Sewer Districts, south into

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These clarifications have been incorporated into the Final EIS Appendix K, Public Services and Utilities Discipline Report.

L-005-024

Descriptions throughout the Final EIS have been updated to more accurately describe the County's combined sewer system.

Pierce County to include the City of Pacific, east to include the Cities of Sammamish and Black Diamond, and west to include Vashon Island. Please see the attached figure.

Page 22, paragraph 3: It would be helpful to clarify that the combined sewer system exists only within the City of Seattle. As stated, it sounds like combined systems may exist throughout the King County system (Federal Way to Issaquah to Snohomish County) when, in fact, only Seattle contributes stormwater directly to the King County system.

Page 22, paragraph 5: The statement, "Portions of the combined system have limited capacity" is misleading. The entire King County system has limited capacity, and, most importantly for this discussion, the Elliott Bay Interceptor has limited capacity.

Pages 26-27, Sections 3.4.2 through 3.4.5: The Washington, Madison, and University sub-basins underwent partial separation in the early 1990s, which means some of the stormwater was separated and now is discharged directly to surface waters; however, some of the stormwater continues to enter the combined system, potentially going to West Point. There also may be low-flow diversion structures in the Washington, Madison, and University sub-basins.

Page 27, Section 3.4.5: This section states that stormwater from the University Sub-basin "is now collected and discharged in a stormwater-only drainage system" and discharged to Elliott Bay and that "None of the stormwater runoff from this sub-basin is diverted to the West Point TP." However, saltwater from the stormwater drainage system is, in fact, entering the Elliott Bay Interceptor and being conveyed to the West Point Treatment Plant. Please see the report, "Saltwater Intrusion into the King County Sewer System," issued November 6, 2003, by the King County Wastewater Treatment Division. Please explain how saltwater from overflows at the University Street outfall is entering the combined sewer system.

Page 29, Section 3.5.1: The King Sub-basin discharges to the Elliott Bay Interceptor under all but the most extreme storm conditions (see attached figure showing King County wastewater facilities). This makes it, in effect, a "high-flow diversion" for the basin stormwater, transferring all of the stormwater pollutants to Denny Way CSO, other King County CSOs, or West Point.

Page 29, Section 3.5.1: Part of the storm flows from the King Sub-basin go into the 30-inch pipe downstream of the King Street Regulator; because these flows enter the system downstream of the regulator, they are conveyed to and treated at the West Point Treatment Plant. The flows that do go into the regulator are either treated at the West Point Treatment Plant or discharged as CSO flow at the King Street outfall.

Page 29, Section 3.5.2: Stormwater from the Pike Sub-basin is discharged through City of Seattle CSOs or the Denny Way CSO, or it is transferred to West Point.

Page 29, Section 3.5.3: During large storm events, salt water from the Vine Street outfall gets into the Elliott Bay Interceptor for treatment at the West Point Treatment Plant. See the report,

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"Saltwater Intrusion into the King County Sewer System," issued November 6, 2003, by the King County Wastewater Treatment Division. Please explain how saltwater from overflows at the Vine Street outfall is entering the combined sewer system.

Pages 31-32, Section 3.7.1, last paragraph: Harbor Island is also a Superfund site, and the boundary of the Harbor Island site has been extended across the East Waterway.

Policies and Regulations/Permits

Washington State and King County policies address stormwater and wastewater discharge and collection.

L-005-025

Washington State Regulations

The Convey and Treat Approach for managing stormwater from the viaduct and seawall replacement project (Draft EIS, page 20) would collect stormwater and convey it to the combined sewer system for treatment at the West Point Treatment Plant or, during large storms, at the soon-to-be-completed Denny Way or proposed Royal Brougham CSO Treatment Facilities. However, WAC 173-226-100 prohibits the discharging of stormwater into municipal sewerage systems. Paragraph (2) states:

- The following discharges to municipal sewerage systems are also prohibited:
- (h) Any of the following discharges, unless approved by the department under extraordinary circumstances (such as lack of direct discharge alternatives due to combined sewer service or need to augment sewage flows due to septic conditions ...
 - (ii) Storm water and other direct inflow sources ...

Appendix S: Water Resources Discipline Report (Section 10.2.4) should be revised to accurately represent the state prohibition on discharge of stormwater to the sewer system. WAC 173-226-100(2)(h) states that the discharge of stormwater to the sewer system is prohibited "unless approved by [the Washington State Department of Ecology] under extraordinary circumstances (such as lack of direct discharge alternatives due to combined sewer service...)". The presence of combined sewers is not the reason to discharge stormwater into them; it's the lack of alternatives that would provide a reason. Direct discharge alternatives often co-exist with combined sewers. Partially separated areas have both types of systems, and separated areas are frequently interspersed with combined areas. This is the situation along the waterfront. The project, as proposed, has viable alternatives to discharging stormwater into the combined sewer system. King County believes that the reconstruction of the viaduct and surface street is the opportunity to design and construct stormwater outfalls from the viaduct to Elliot Bay and thus remove stormwater runoff from the sanitary sewer system.

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The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS.

References to these Washington state regulations and to King County Ordinance 13680 (as King County Code Chapter 28.86) have been added to Section 2 of Appendix O, Surface Water Discipline Report.

King County Policies

The citation of King County policies in *Appendix S: Water Resources Discipline Report* (Section 10.5.1) is not complete nor is it completely accurate. The correct citation of Ordinance 13680, Policy CSOCP-4 is as follows:

Although King County's wastewater collection system is impacted by the intrusion of clean stormwater, conveyance and treatment facilities shall not be designed for the interception, collection and treatment of clean stormwater.

Appendix S excludes the word "although." The word "although" acknowledges the influence of stormwater on the system and demonstrates the intent that the policy exists *in spite of* the influence of stormwater on the system.

Another policy in Ordinance 13680 addresses the need to remove infiltration and inflow (I/I) into the system:

Policy I/IP-1: King County is committed to controlling I/I within its regional conveyance system and shall rehabilitate portions of its regional conveyance system to reduce I/I whenever the cost of rehabilitation is less than the costs of conveying and treating that flow or when rehabilitation provides significant environmental benefits to water quantity, water quality, stream flows, wetlands or habitat for species listed under the ESA.

Policy also communicates the expectation that the stormwater would be taken only from industry, and states King County's intent to collect fees to manage that stormwater:

Policy CSOCP-5: King County shall accept stormwater runoff from industrial sources and shall establish a fee to capture the cost of transporting and treating this stormwater. Specific authorization for such discharge is required.

Policy directs that King County's stormwater management programs should not overlap or conflict with City of Seattle programs:

Policy CSOCP-6: King County, in conjunction with the city of Seattle, shall implement stormwater management programs in a cooperative manner that results in a coordinated joint effort and avoids duplicative or conflicting programs.

(King County has limited stormwater management responsibilities for only the Lander and Densmore drains.)

L-005-026

Liability/Cost

The analysis of stormwater alternatives should include an analysis of how costs and liabilities would be borne by the affected agencies:

- Agency liability for pollutants from stormwater/CSO sources must be clarified. Pollutants may be found in the water column or sediments off of outfalls or in the biosolids at the West Point Treatment Plant. Provisions must be made to allow proportionally appropriate shared liability for future pollutant concerns that may not currently be known or fully understood (for example, endocrine disrupting chemicals).
- The Convey and Treat Approach would have financial impacts on existing and future King County CSO facilities. For example, the Draft EIS assumes that the size of the Royal Brougham CSO treatment plant would need to be increased by 11 percent. King County anticipates that the capital cost for this facility would be \$31 million in 2001 dollars. An increase of 11 percent would be approximately \$3.4 million. The City of Seattle must estimate the proportionally appropriate costs to construct, operate, and maintain a larger Royal Brougham CSO treatment plant. King County expects that costs would be reimbursed on a pro-rated basis. The administrative costs associated with determining the above on an annual basis should be factored into the costs of replacing the viaduct and seawall.
- The draft EIS should provide more analysis of the impacts of the Convey and Treat Approach on King County's existing agreement with the Washington State Department of Ecology regarding the treatment of flows from the Denny Way CSO treatment plant. The City of Seattle would need to identify any additional costs incurred to maintain treatment levels and sediment quality at the Denny Way CSO and would need to compensate King County for those costs.

L-005-027

- The analysis of the stormwater alternatives did not factor into the cost evaluation the effects on liability and environmental effects from contaminated sediments off of outfalls. Each scenario would change the existing discharge points and would have varying effects on the sediment contamination levels at those outfalls. The difference in the sediment contamination needs to be disclosed and the cost implications quantified to fully understand the project alternatives' true impacts and costs.

L-005-028

- *Appendix O: Public Service and Utilities Technical Memorandum* (Section 5.1.3, Sanitary Sewer and Storm Drainage) should state that while the project area is predominantly combined, it includes areas of separated sewers and areas where partial separation has occurred. This section also states, "King County bills SPU for services provided." The statement should be clarified to say that King County bills Seattle Public Utilities for wastewater management services based on Seattle's water use. There is currently no mechanism to bill for stormwater management.

L-005-026

The Convey and Treat Alternative has not been carried into the Final EIS. Improvements to the CSO system are now considered independent projects and are not part of any of the alternatives. Therefore, cost and liability analysis of these measures is not part of this study.

L-005-027

The project would not involve outfall work and only one stormwater management approach is now being considered. To the extent possible, this stormwater management approach does not change sub-basin boundaries or receiving waters.

L-005-028

This detail has been deleted from Appendix K, Public Services and Utilities Discipline Report.

L-005-029

- The Convey and Treat Approach would increase stormwater flow to the Royal Brougham CSO treatment plant. King County used data from Figure 2 in the 1972 report *Seattle Intense Rainfall and Storm Runoff*, by Harvey W. Duff and George C. C. Hsieh, to calculate the amount of peak flow that could result from the new stormwater. Using rainfall curves for a frequency of once-in-25-years and durations of 30 minutes and 60 minutes, the peak flow for the 26.8-acre area would be 51 cfs and 18 cfs, respectively.

The Washington State Department of Ecology recently has indicated that any new outfall will be required to meet water quality criteria at the end of the pipe. The increased stormwater flow to the Royal Brougham CSO treatment plant that would result from the Convey and Treat Approach could create the need for either increased storage facilities or a new outfall at the plant that otherwise would not be needed. King County assumes that the Washington State Department of Transportation and the City of Seattle would be responsible for increased costs for any enhanced treatment that would be needed in order to meet this new water quality requirement, along with the cost to permit and construct a new outfall.

L-005-030

Convey and Treat Approach

The King County Wastewater Treatment Division has the following comments on the Convey and Treat Approach:

Appendix S: Water Resources Discipline Report

Page 70, Exhibit 5-1: The data in Exhibit 5-1 indicate that both the BMP Approach and the Convey and Treat Approach benefit water quality. These results are from a very rough analysis, but suggest that the Convey and Treat Approach would:

- Release more pollution overall than the BMP Approach.
- Shift 1-2 percent of pollution from Elliott Bay to Puget Sound via the West Point discharge.
- Move remaining pollution from the central waterfront to a little north via the Denny Way CSO discharge and a little south to the Royal Brougham CSO discharge.

Page 100, Section 7.6: It is stated that the Convey and Treat Approach will increase the volume and duration of CSO events but that "this is a very small volume compared to the total volume". King County believes there is not sufficient information to make this statement. It is possible that this approach could increase the volume of the "one untreated overflow per year" at the soon to be completed Denny Way CSO project by a factor of three. King County anticipates that under current conditions the Denny Way facility would discharge an average of 8 million gallons of untreated CSO per year. If the estimate of a three-fold increase is correct, the Convey and Treat Approach could increase the discharge to 24 million gallons per year, a significant loss of the effectiveness planned for the Denny Way facility. The Convey

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The Royal Brougham CSO Treatment Facility is no longer proposed for any of the alternatives. As a result, the Royal Brougham (Connecticut) outfall will not be modified.

L-005-030

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS.

and Treat Approach would increase the volume of the treated discharge as well and possibly would increase the number of events.

In addition, sending flows to the Denny Way CSO would change the chemistry of the facility's discharge by changing the ratio of flows from the Elliott Bay Interceptor to those from the new Mercer Street Tunnel. The Denny Way CSO project has been designed to blend these flows to meet permit discharge limits. The blended flows will receive screening and disinfection prior to discharge; however, flows from the Mercer Street Tunnel will receive primary treatment (physical settling) while only limited flows from the Elliott Bay Interceptor will enter the tunnel for settling. The increased stormwater from the Convey and Treat Approach would increase the ratio of untreated flows (from the Elliott Bay Interceptor) to treated flows (from the Mercer Street Tunnel). This change could result in the Denny Way CSO not being able to meet permit discharge limits and not being consistent with the project's Biological Assessment and the requirements of the Endangered Species Act.

Draft EIS

Page 20—Convey and Treat Approach:

The discussion of the Convey and Treat Approach describes how stormwater would be managed for the completed project. However, it was not clear in the Draft EIS, whether stormwater and/or dewatering water would be discharged to the combined sewer system during construction. How does the City of Seattle plan to manage stormwater and dewatering water during construction?

If dewatering water is discharged to the sanitary sewer, it would have an effect on parameters such as salinity, pH, sulfides, and turbidity. Does the AWV project plan to build a temporary stormwater treatment facility? If so, a permanent facility to treat the stormwater after construction may be a more viable option than a combined sewer/stormwater facility. The feasibility of this option should be evaluated in the final EIS.

It would be helpful to clarify how stormwater and dewatering flows would be managed during construction so that King County can identify impacts and determine whether a discharge authorization would be required, pursuant to King County Public Rule PUT 8-14 (PR).

BMP Approach

Draft EIS

Page 18—How do the alternatives affect water quality? Exhibit 2-25 on page 20 indicates that different stormwater management approaches would be used for different project alternatives. It also indicates that the BMP Approach for the Rebuild and Tunnel Alternatives is slightly better environmentally than the Convey and Treat Approach for the Bypass Tunnel and Surface Alternatives or the BMP Approach for the Aerial Alternative. However, the text of the draft EIS makes no mention of different approaches for different alternatives or different water quality benefits, but confusingly states under Convey and Treat Approach that the

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Convey and Treat Approach "will reduce the volume of untreated stormwater, resulting in a higher quality discharge." It would be helpful to explain in the text the different approaches for different alternatives and discuss the different water quality benefits that would result from each.

Page 18–BMP Approach: The section on the BMP Approach should discuss the benefits of the BMP Approach and state that the BMP Approach, as well as the Convey and Treat Approach, "will reduce the volume of untreated stormwater, resulting in a higher quality discharge." Appendix S indicates that the BMP Approach will perform as well, even better, than the Convey and Treat Approach.

Denny Way CSO Treatment Plant

Draft EIS

Page 20–Convey and Treat Approach: The draft EIS should provide more analysis of the impacts of the Convey and Treat Approach on Denny Way CSO discharges. The Denny Way CSO project has been designed and constructed to manage about 85 million gallons per year of combined flow from the City of Seattle CSOs, primarily from the Lake Union area. The Convey and Treat Approach would significantly increase the loading over the design conditions and may impair the facility's ability to meet NPDES discharge permit requirements. (See earlier comments under "Convey and Treat Approach.")

Appendix S: Water Resources Discipline Report

Page 100, Section 7.6: The discussion of the Bypass Tunnel Alternative acknowledges that the Convey and Treat Approach would increase the volume of stormwater in the combined sewer system compared to existing conditions, but states that "this is a very small volume compared to the total volume." The fair comparison is not project stormwater volume to total sewage, but project stormwater volume to the volume of combined sewage that would not reach West Point for full secondary treatment. The Convey and Treat Approach would at least double the volume to be managed as CSO.

Royal Brougham CSO Treatment Plant

King County has the same concerns about the increased risk from human pathogens that would result from more stormwater being discharged through the Royal Brougham CSO Treatment Plant as described in the previous section for the Denny Way CSO.

Appendix S: Water Resources Discipline Report

Page 60, Exhibit 4-9, and Appendix B: Exhibit 4-9 provides removal efficiencies for different treatment methods. The removal efficiencies provided for the Royal Brougham CSO treatment plant are 80 percent for total suspended solids (TSS), 79 percent for total copper, and 86 percent for total zinc. These levels were based on the assumption that ballasted

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L-005-030

sedimentation (Actiflow) technology would be used for the proposed treatment plant. This is the same technology used at the City of Bremerton CSO treatment plant, and the analysis in Appendix S assumed that removal efficiencies at Royal Brougham would be the same as in Bremerton. However, influent concentrations and loading in Bremerton are different from those in King County, and thus the removal efficiencies would differ as well. The Royal Brougham facility would likely not achieve the levels of pollutant removal assumed for the Convey and Treat Approach.

Compare/Model/Provide More Information

Draft EIS

Page 28—What issues remain to be resolved? The AWV project needs to provide better hydraulic modeling of the Convey and Treat Approach and better assessments of the impacts of stormwater management on King County's wastewater facilities and the environment before King County can decide if we can agree to that approach. Discussions will need to resolve how operational costs will be reimbursed and how costs to address changing regulatory requirements and liability issues will be addressed. There needs to be significantly increased dialogue between King County and Seattle Public Utilities before decisions are made. King County is eager for these to occur.

L-005-031

Appendix S: Water Resources Discipline Report

Pages 2-3, Section 1.2: The analysis in Appendix S and the draft EIS provides a very rough estimate of the more chronic impacts of stormwater management based on annual mass load. As part of the planning for the Alaskan Way Viaduct and Seawall Replacement Project, King County was invited to provide information to the Resource Agency Leadership Forum, and, for the past year and a half, King County has been meeting with project consultants to share information developed for the Denny Way CSO project. To allow a gross, initial screening of the alternatives, the King County Wastewater Treatment Division provided rough estimates of what would happen in both the King County and City of Seattle systems based on limited system-wide information developed for the Denny Way project. However, the information is not adequate for detailed comparisons. It will be very important to do a peak flow analysis to look at potential acute effects. The information needed for a more in-depth analysis, such as modeling of wastewater or stormwater systems, was not available for this study. King County recommends that more project specific and detailed modeling be done to support final decisions.

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L-005-031

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS.

The proposed stormwater management approach is based on a presumptive approach to compliance using the WSDOT and Seattle Stormwater Manuals. To the extent possible, this approach does not change sub-basin areas or the volume of water discharged to the combined sewer system.

L-005-032 | Page 21, Exhibit 3-6: A low-flow diversion should be considered stormwater treatment. King County has suggested that application be made to the Washington State Department of Ecology for recognition of low-flow diversions as BMPs. The assumption in the Water Resources Discipline Report that a diversion structure captures only 10 percent of the pollutant load may underestimate pollutant removal. Low-flow diversions continually take all stormwater up to a certain level and divert the rest to direct discharge. Therefore all the stormwater from smaller storms is captured. Better information is needed on:

- o How much stormwater goes into the wastewater system.
- o The pollutant load of that stormwater. (Is there a first-flush?)
- o How much of that pollutant load would go to the West Point Treatment Plant and how much would go to the Denny Way and Royal Brougham CSO treatment plants.

With better information we can identify if greater than “minimal” treatment occurs for these flows and obtain appropriate pollutant control credit.

L-005-033 | Pages 41-53, Section 4.2: By applying the BMP Approach to some of the alternatives and the Convey and Treat Approach to the others, it is difficult to compare results since several variables change. It would be more straightforward to look at both the BMP Approach and Convey and Treat Approach for at least one alternative to see more clearly how the stormwater management methods effect loading with all other variables held constant.

L-005-034 | Page 60, Exhibit 4-9: The reported treatment efficiency for ballasted sedimentation is based on limited experience using it for CSOs and in situations fairly different from those that exist here. It must also be remembered that pollutants captured in the ballasted sedimentation process would undergo a second treatment process at West Point that would remove about 75 percent of the solids but still discharge about 25 percent to Puget Sound. The overall true capture efficiency would be only 75 percent of the 80 percent reported as the ballasted sedimentation efficiency to equal 60 percent removal overall.

It would be useful to footnote that the reported West Point treatment efficiency (75 percent) for TSS is the average during high flow (storm) treatment that we have reported to the Washington State Department of Ecology when other King County CSO plants are operating. During these high-flow events, one cannot expect to see the +85 percent removal that is actually a monthly average including low flow periods.

L-005-035 | Page 60, Exhibit 4-10: The percentages of annual volume treated shown in this exhibit are gross oversimplifications based on more system-wide information developed for the Denny Way CSO project, but these percentages are all that is currently available for this assessment. More specific hydraulic modeling needs to be done.

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L-005-032

The complex flow routing analysis is no longer required because the Convey and Treat Approach has been dropped from consideration. Pollutant loads are calculated using the approved WSDOT method as discussed in the Environmental Procedures Manual and the Surface Water Discipline Report. This method does not account for off-site treatment.

L-005-033

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS.

L-005-034

The Royal Brougham CSO Treatment Facility is no longer proposed for any of the alternatives. As a result, the Royal Brougham (Connecticut) outfall will not be modified.

L-005-035

The detailed analysis using flow routing was not used for the Final EIS because the Convey and Treat Approach has been dropped from the analysis and a single approach to managing stormwater is being proposed. WSDOT's standard method for evaluating annual pollutant loads was used to compare each alternative.

L-005-036 | Page 60, paragraph 2: The reported volume of one untreated event per year is a very rough estimate. That event will be larger and last longer than such an event without the Convey and Treat Approach.

L-005-037 | Pages 64-66, Exhibits 4-13 through 4-15: The stormwater runoff flow diagrams are extreme simplifications because the information provided is the only information available. King County views the diagrams as useful only for gross alternative screening. They tell us nothing about what is happening under peak flow conditions when peak toxicity is a concern. Better modeling will be needed for more accurate alternative comparisons.

Impacts to Water Quality, Fish, and Wildlife

Draft EIS

L-005-038 | Page 17—How do effects to fish and wildlife vary between the alternatives? Recent studies indicate that juvenile salmon “hold up” and spend significant time in the East Waterway of the Duwamish River during their migration to sea. The Convey and Treat Approach to stormwater management would move much of the stormwater from the project area to an outfall in this location and discharge the stormwater in the form of increased volumes of treated and untreated CSO. This would result in greater exposure of juvenile salmon to pollutants at a critical life stage. This should be acknowledged in the final EIS. (This concern also should be addressed in Appendix R: Fisheries, Wildlife and Habitat Disciplines Report, Section 4.1.2.)

A more detailed analysis of impacts to wildlife, human health, and the environment from increased discharge at Royal Brougham needs to be conducted, especially as it relates to endangered species and the habits of salmon in the nearshore area at the mouth of the Duwamish River.

In addition, the Convey and Treat Approach would increase the volume of treated and untreated CSO discharged at the Denny Way CSO. This would change the conditions used as the basis of the Biological Assessment and Biological Opinion that was prepared for the Denny Way project in compliance with the Endangered Species Act. If the Denny Way CSO conditions were to change, it could result in King County needing to renew consultation with the National Oceanic and Atmospheric Administration/Fisheries and the U.S. Fish and Wildlife Service. King County would consider this to be a significant impact.

L-005-039 | Page 18—How do the alternatives affect water quality? The Draft EIS states:

The project area, approximately 98 acres, is less than 5 percent of the total surface area of the drainage basin. Because the project area contributes a very small portion of the total stormwater flow within the drainage basin, the overall effect of the project on water quality will not be substantial.

The area-based context of this conclusion is misleading. See the earlier discussion.

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L-005-036

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS.

L-005-037

Peak toxicity is no longer a concern because the proposed project will not affect CSOs. Potential toxicity of stormwater discharges is discussed in the Biological Assessment prepared for the preferred alternative.

L-005-038

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS. An updated pollutant load analysis is also included in the Final EIS. Also, please see the updated Wildlife, Fish, and Vegetation Discipline Report, Appendix N of the Final EIS, for a discussion of project effects on fish and wildlife.

L-005-039

This statement has been removed from the text.

L-005-040 Impacts to Sediments

- The draft EIS completely ignores the effects of the project on areas where sediments are contaminated to levels above the state cleanup standards. If the project is proposing to disturb those areas during construction, sediment contaminants will be spread over a broad area and will impact the marine environment and enhance the bioavailability of contaminants to marine organisms. This would be a significant environmental effect that has not been identified or evaluated in the impact statement. This effect has to be included to understand the environmental and public health effects of the project adequately.
- In addition, if the project affects areas of sediment that are contaminated to levels above the state cleanup standards, the state cleanup standards require the contamination to be addressed. This means that the areas of contamination along the portion of the project that intrude into the marine environment will have to be remediated. This remediation is a significant component of the project that was not included in the evaluation of impacts. In addition to the impacts discussed above, remediation will affect large areas of the nearshore environment and displace the marine community for several years until recolonization starts to return the area towards fully functional habitat.

For some of the alternatives, a portion of the project intrudes into marine habitat around the Washington Street pier. This area has been documented as exceeding sediment standards and is on Washington State's contaminated site list. Intrusion into this area would affect those sediments and require cleanup, an impact that is not identified as part of the project or evaluated in the EIS.

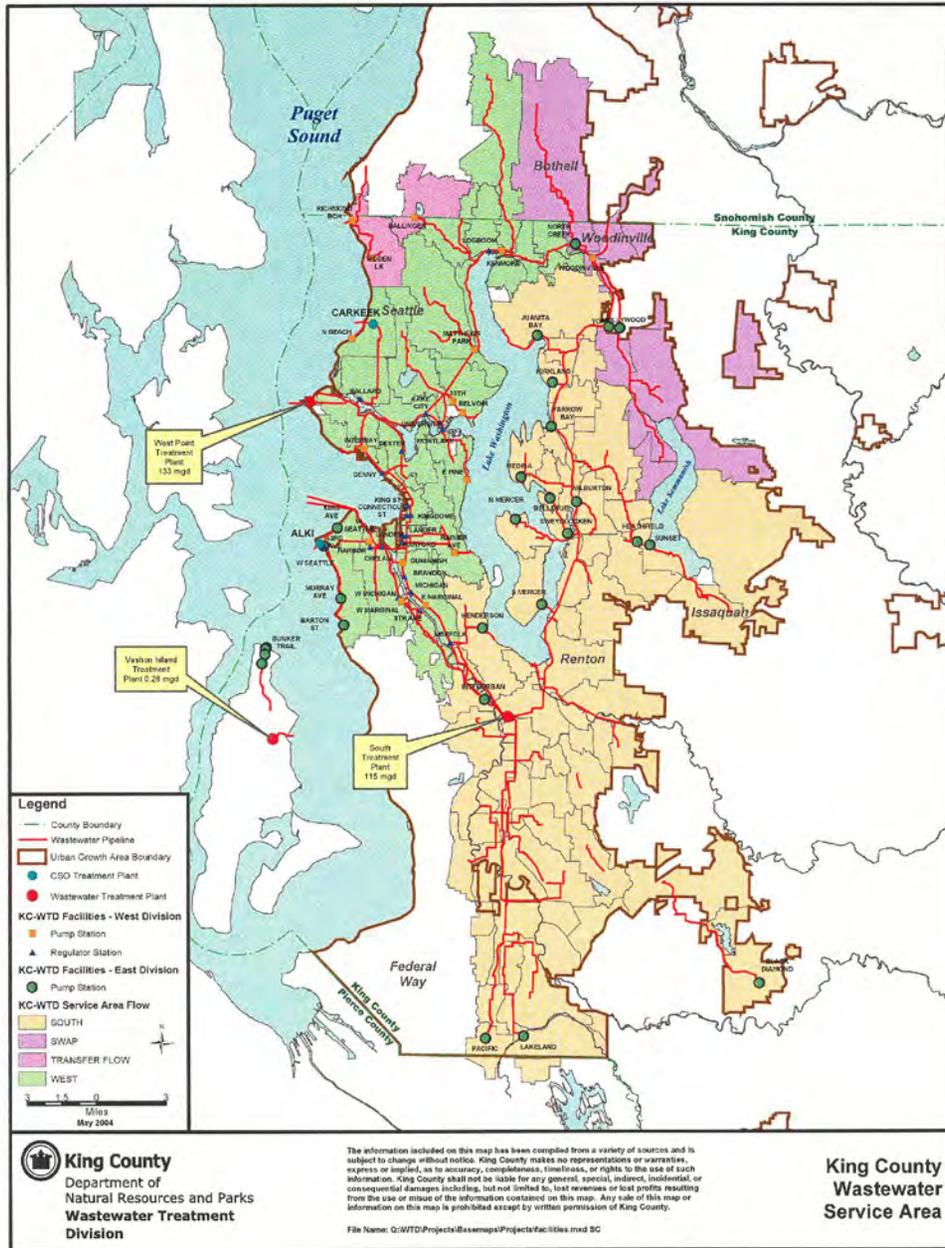
- L-005-041**
- The draft EIS states that PAHs are not of concern in runoff from stormwater from this project based on national data. However, this conclusion disregards local data that contradicts this conclusion and demonstrates PAHs to be a significant concern from this type of runoff. Specifically, data collected on runoff from SR-520 on the Lake Washington floating bridge, from I-5 stormwater outfalls into Thea Foss waterway in Tacoma, and from stormwater outfalls along the City of Tacoma waterfront all show that PAHs are of significant concern and collect in the sediments near the outfalls. This data can be easily obtained from the King County Department of Natural Resources and Parks, the Washington State Department of Transportation, and the city of Tacoma. Given this local information, the effects of PAHs from the project outfalls needs to be assessed to fully understand the potential impacts.

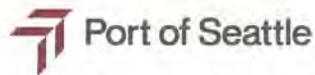
L-005-040

Sections 6.3 and 6.4 of the Final EIS have been revised to include the risks associated with disturbance of contaminated sediment during construction.

L-005-041

WSDOT's Environmental Procedures Manual was used for the pollutant loading analysis. This method evaluates loads for TSS, total copper, dissolved copper, total zinc, and dissolved zinc, because it is representative of pollutants found in stormwater runoff.





RECEIVED
JUN 01 2004
AWWSP Team Office

June 1, 2004

Ms. Allison Ray
WSDOT
999 Third Avenue S., Suite 2424
Seattle, WA 98104

Re: Port of Seattle—Comments on the Viaduct/Seawall DEIS

Dear Ms. Ray:

Thank you for the opportunity to comment on the *Draft Environmental Impact Statement for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project*. We would also like to thank the project team for the effort it has made to date. The amount, quality, and openness of its work are outstanding. We very much appreciate the team's effort, and its willingness to provide an opportunity for Port staff to participate in the process. This already allowed us to include many Port concerns in the analysis, even if they are not addressed directly in the document we are commenting on today. We are looking forward to continuing work with the project team to address these and other, as yet unidentified, issues.

Our letter from Port of Seattle Commission President Paige Miller to Secretary McDonald and Mayor Nickels (please see attached) outlines the Port's major concerns regarding the project. Following is a more detailed, technical set of comments. For your ease of use, it repeats—and expands on—the points made in the policy-level letter.

L-006-001

A. Project Long-term

1. Maintaining corridor capacity

Maintaining the capacity of the SR 99 Corridor is critical to our region's economy. A reduction in capacity would have a detrimental effect on freight mobility—lack of capacity would dramatically increase pressure on other facilities that are already stressed. There are three components to corridor capacity:

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L-006-001

Thank you for your comment expressing a preference for the 2004 Cut-and-Cover Tunnel Alternative. The project recognizes the importance of providing sufficient capacity in the SR 99 corridor and efficiently moving people and goods to and through downtown Seattle, which is expressed in the project's purpose and need statement. Because the project has evolved since 2004, please see the Final EIS and Appendix C, Transportation Discipline Report, for the current discussion of alternatives and transportation effects.

The Surface and Bypass Tunnel Alternatives have been dropped from consideration because they did not meet the project's purpose. Both alternatives would have caused substantial increases in travel times and congestion.

L-006-001

a. **Capacity on the replacement facility itself**

Maintaining capacity in the corridor is critical. We are particularly concerned about the ability of the different design alternatives to facilitate freight operations. According to the DEIS, the Surface and Bypass Tunnel alternatives do not maintain existing corridor capacity. Both Surface and Bypass Tunnel alternatives would force a dramatic increase in traffic on Alaskan Way surface, most likely without the benefit of a grade separation at Broad Street. We feel that these two alternatives are not acceptable for this reason. Although both the Aerial and Tunnel alternative maintain existing capacity, we support the six-lane tunnel alternative for the central waterfront because it better supports an economically viable waterfront and livable environment.

L-006-002

b. **Capacity on surface arterials**

The DEIS indicates that some alternatives may reduce the capacity of surface arterial streets, such as Alaskan Way surface. We urge you to ensure that these arterials, and in particular Alaskan Way surface, do not lose any capacity that supports existing uses, including general-purpose traffic, transit, freight delivery and over-legal trucks, tourist activities, ferries (both state and private), and cruise ship access.

L-006-003

c. **Capacity on the BNSF mainline**

The DEIS does not address the potential impact of a seawall failure on the ability of the BNSF mainline to carry freight and passenger trains. We are concerned about this scenario and believe it should be further analyzed. If there is a realistic chance that loss of the seawall would make the mainline unusable, contingency plans prepared in conjunction with the viaduct/seawall project should also prepare for rail freight and passenger movement in the absence of the mainline.

L-006-004

2. **Need for the Elliott/Western ramps**

The DEIS assumes that the Broad Street underpass will be built in advance of the project. We are concerned that a permanent grade separation is no longer planned, although it is still needed. The project should explore the feasibility of constructing a grade separation that would accommodate viaduct construction as well as long-term needs.

The DEIS itself further makes the need for these ramps clear when it indicates that, because BINMIC is not served directly by the regional highway system, "primary access to regional freeways and industrial areas

L-006-002

None of the alternatives proposed reduce capacity of surface arterial streets. However, in some cases, additional traffic would be shifted to surface arterials as a result of configuration changes associated with SR 99. The traffic analysis presented in the Final EIS illustrates the expected traffic conditions and volumes. With the preferred Bored Tunnel Alternative, the final configuration of Alaskan Way will be determined by the separate Central Waterfront Project led by the City of Seattle.

L-006-003

The EISs prepared for this project present the existing conditions in the study area and discuss the potential effects on the environment to construct and operate each proposed alternative. The EISs are not meant to present contingency plans for catastrophic events.

With the preferred Bored Tunnel Alternative, the seawall will be replaced by the Elliott Bay Seawall Project, which is a separate project led by the City of Seattle. If the Cut-and-Cover Tunnel or Elevated Structure Alternative is selected, the seawall would be replaced as part of the alternative.

L-006-004

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative. This alternative does not include ramps to Elliott and Western avenues. This transportation connector would be implemented by the City of Seattle as part of an independent project. The Elliott and Western Avenue ramps have been retained with the Elevated Structure and Cut-and-Cover Tunnel Alternatives. The alternatives have been refined since 2004, please see the Final EIS for the current configuration of each proposed build alternative.

L-006-004

north of Seattle is via 15th Avenue, connecting to SR 99 by way of the Elliott Avenue and Western Avenue ramps. (p. C-84)" The DEIS also projects that lack of these ramps would cause a higher level of congestion on Alaskan Way surface north of Pike Street (p. C-176). In addition, a replacement facility without these ramps and without a grade separation at Broad Street would cause more conflicts between vehicular traffic and rail traffic on the BNSF mainline at the Broad Street crossing, due to increased traffic (p. C-225/6). With these ramps, the negative impacts on freight mobility and, potentially, cruise ship operations at Pier 66 will be reduced.

L-006-005

3. Provisions for over-legal trucks

The DEIS does not contain sufficient analysis addressing the needs of over-legal trucks under any of the replacement alternatives. Apart from I-5, Alaskan Way surface is the only over-legal north-south truck route through the core of Seattle. Over-legal trucks must be considered as the analysis moves to the next stage. Any design configurations for Alaskan Way surface must ensure that the route is safe and easy to use.

L-006-006

4. Capacity and functionality of rail operations

Adequate rail service is critical for our container operations. For an evaluation of the potential magnitude of the issue, please consider the following: About 70 % of our import containers leave the harbor by rail. Any loss in function would affect all container terminals, with a related impact on our tenants and the regional economy. Our marine terminals support more than 18,000 family-wage jobs and generate \$ 895 million in wages, and \$ 107 million in state and local taxes each year. (Martin and Associates report, September 2000.)

To ensure that rail remains unaffected, the two railroad companies owning and operating the system must continue to be heard and their needs supported. Further, the project may need rail operations modeling to demonstrate that proposed changes succeed in maintaining capacity and functionality. With regard to the information provided by the DEIS, we have the following comments:

- SIG, Whatcom, and Argo Yards support container terminal operations at T-5 and T-18 as well as T-46. In addition, the SIG and Whatcom tail track, rail access to Terminal 25 (northwest of East Marginal Way and Spokane Street), and the Duwamish rail system are integral parts of the system. All must be preserved.
- Recent Port analysis of rail needs at the Southern Segment supports this point. The tracks dedicated to interim storage capacity for double-stack cars for intermodal container operations are already at capacity, therefore, closing Whatcom Yard during construction would require replacement yards elsewhere prior to closing the yard. We have begun

L-006-005

Coordination with the City of Seattle Department of Transportation to review freight route adjustments, including accommodations for over-legal vehicles, is ongoing. Currently, the City allows access through the Seattle Center City, provided over-legal truck operators obtain a permit and operate their trucks only during times allowed in the permit. As the project progresses, outreach to the freight community will continue to address the needs of over-legal trucks either as part of the Bored Tunnel Alternative (preferred alternative) or on the Alaskan Way surface street after construction. Analysis results addressing effects on trucks are provided in Appendix C, Transportation Discipline Report, of the Final EIS.

L-006-006

The project team is committed to continuing to work with the railroads, freight operators, and the Port of Seattle to explore opportunities to minimize both short and long-term impacts to freight rail operations, and container terminal access. All of the above stakeholders have been directly involved in early project design efforts and remain included in efforts involving final project design and construction management planning.

L-006-006

to look for options to increase double-stack car storage capacity to meet our own needs but have found them to be scarce.

- If the Whatcom Yard is moved east of SR 99, the Port will require that some rail access be maintained on the west side to support existing operations at T-25.

L-006-007

5. Grade separation at Broad Street

- The DEIS traffic flow analysis for 2030 is based on the assumption that there would be an underpass providing grade separation with the BNSF mainline at Alaskan Way surface and Broad Street. It now appears unlikely that it will be built. However the project is proposing construction on of a temporary overpass in this location. The project should explore the feasibility of constructing a grade separation that would accommodate viaduct construction as well as long term needs.
- Furthermore, unless it is evident that a permanent grade separation will be provided at Broad Street, SR 99 and the ramps to Western and Elliott should be designed to accommodate necessary flow without the grade separation. Traffic modeling efforts should reanalyze the functionality of the ramps without the Broad Street underpass, as well as system performance in the vicinity of Broad Street without a grade separation.
- A new arterial connected to Belltown could provide an alternative to Broad Street during train-crossing delays. We are interested in exploring the potential of Armory Way, as alluded to in the Bypass Tunnel Alternative Option.

L-006-008

6. Complementary regional system upgrades and connections

a. The Mercer Corridor

This is a critical east-west connection in the north end of the study area. While the DEIS contains some discussion on improvements to Mercer Street, closure of a portion of Broad Street, and a new overpass at Thomas Street, it provides only very limited analysis. These changes appear to reduce already constrained capacity between the waterfront and I-5 and to sever the only designated east-west truck route in the north end of downtown. From reading the DEIS, is not clear to us how these elements relate to the replacement of the viaduct and the seawall. We hope that further analysis will clarify these issues and develop a solution that does not require loss of capacity in an already severely congested east-west corridor.

L-006-007

The Elevated Structure Alternative assumes the Broad Street detour during construction, but its route has changed since the Draft EIS. Please see the Final EIS Appendix C, Transportation Discipline Report, for updated construction staging for the Bored Tunnel (preferred alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives. The Elliott/Western Connector is an independent project being led by the City of Seattle. The Elliott/Western Connector would provide a connection from Alaskan Way to the Elliott/Western corridor that provides access to and from BINMIC and neighborhoods north of Seattle. The connector would provide an overcrossing of the BNSF mainline railroad tracks.

L-006-008

The Mercer corridor from Dexter Avenue to Fifth Avenue is included as part of the Alaskan Way Viaduct Replacement Project. The Mercer corridor from Fifth Avenue to Elliott Avenue is an independent project being led by the City of Seattle. Appendix C, Transportation Discipline Report, of the Final EIS contains supplementary information regarding the Mercer Corridor, which will provide improved east-west travel in the north section of the study area.

L-006-009

b. **Westside north-south link**

The viaduct functions as a north-south link for the western side of the highway system through Seattle and King County. It complements and relieves I-5 capacity through Seattle. Specific connections enhanced by the viaduct are the SR 509 connection to Sea-Tac Airport and the 15th Avenue West Corridor toward Ballard and Port facilities at Terminal 91, Fisherman's Terminal and Shilshole Bay.

L-006-010

c. **East-west through the Duwamish (SR 519 and Spokane Street)**

- The east-west connections between the waterfront and Interstates 5 and 90 at SR 519 are critically important to the Port and its customers. The preferred alternative should maximize the capacity of this corridor and allow for future improvements.
- Similarly, the Spokane Street Viaduct provides essential corridor for Port container traffic. We anticipate this will also be an important corridor during viaduct construction and support the seismic and safety project proposed by the City here.

L-006-011

7. **High mode split assumptions**

The DEIS analysis of the traffic impacts of the various alternatives is based on a travel demand model that "may overestimate the mode shift that could occur by 2030. (p. C-14)" According to the DEIS, the traffic model assumes a 76% ride share to the downtown core. Additional sensitivity analysis, evaluating the impact of a smaller increase in transit use, indicated that the impact on the replacement facility itself may not be very high due to facility constraints elsewhere. However, there would be a 27-29 % increase in traffic on already congested arterials in the downtown area. We urge you to further evaluate and mitigate the impacts of a lower than expected mode split, in particular with regard to Alaskan Way surface and East Marginal Way.

L-006-012

8. **Access and impacts to Port properties**

Many of the Port's facilities, and the tenants using these facilities, will be impacted by the project. It will be critical for the project team to communicate with our tenants to understand their needs before a final design decision is made.

Before we outline concerns regarding specific Port facilities we would like to indicate that we are very concerned that the DEIS does not address detrimental impacts on our cruise ship terminals—in particular P-66, in the heart of the north central segment of the project. We hope that future

L-006-009

All three build alternatives evaluated in the Final EIS would maintain or improve the transportation system connections and vehicle capacity that exist today. Please see the Final EIS, Appendix C Transportation Discipline Report.

L-006-010

The lead agencies acknowledge these comments. The Bored Tunnel Alternative has been identified as the preferred alternative for this project. Please see the Final EIS for current project information.

L-006-011

The travel demand model was updated for the Final EIS and is described in the Transportation Discipline Report (Appendix C of the Final EIS). The update includes improvements to how the model reflects capacity constraints in the roadway network, reduced sensitivity to parking cost assumptions, updated population and employment estimates, updated transit mode share, and verification of network components and their attributes. Please see the Final EIS Appendix C, Transportation Discipline Report, for updated analysis results.

L-006-012

Under the preferred Bored Tunnel Alternative, the City of Seattle is responsible for improvements to the Alaskan Way surface street. Generally, the new street would be located east of the existing Alaskan Way surface street where the viaduct is today to create a wider public space along the waterfront the new street would include sidewalks, bicycle facilities, parking/loading zones, and signalized pedestrian crossings at cross-streets. Access to Pier 66 would be maintained throughout construction. Transportation mitigation measures can be found in Chapter 8 of the Final EIS.

L-006-012

analysis will provide a more in-depth analysis of the needs of our cruise ship operations. Following is an overview of our operations:

This summer, we expect about 150 cruise ship port calls at T-30 (about 90 port calls) and P-66 (about 60 port calls). This generates about 570,000 passenger and over 6,000 truck trips to and from the two terminals.

The majority of ships calling on Seattle today provide capacity for between 1,800 and 2,800 passengers. The trend for new ships coming on line is an increase in passenger capacity. In the past five years, average capacity has grown from about 2,000 to almost 3,000 passengers. Cruise ships making port calls today generate the following number of passenger trips:

**Table 1:
Number of Vehicle Trips Generated by Passengers on a Cruise Ship**

Mode of Travel	Vehicle Occupancy	1,800 Passenger Ship		2,800 Passenger Ship	
		Drop-off	Pick-up	Drop-off	Pick-up
Pass. Veh. Parked ^a	2.0/veh.	165	165	210	210
Pass. Veh. Drop-off ^b	2.0/veh.	110	110	140	140
Buses ^a	33.0/veh.	100	100	126	126
Taxis ^a	2.0/veh.	110	110	140	140
Total		485	485	618	618

^a Each drop-off and pick-up generates one trip on each end of the cruise. ^b Each drop-off and pick-up generates two trips on each end of the cruise. (Source: Haftron Transportation, Traffic Impact Analysis for Cruise Ship Terminal at Terminal 30, September 3, 2002.)

Our cruise terminals operate from May to October. Port calls occur generally on Monday, Thursday, Friday, Saturday and Sunday, trips occur during about an 8-9 hour time-frame between 8 am and 5pm. The economic impact of the cruise ship for the regional economy is significant: In 2004, the Port's cruise ship terminals are estimated to generate about 1,700 jobs and more than \$ 200 million in business revenue. During the next 10 years, we expect our cruise ship business to grow by about 50%.

L-006-013

a. South Segment: Terminal 46

- Design solutions for the South Segment must avoid that Port property which is needed for container operations. (Neither SR 99 ramps, nor the proposed ferry holding lot or access roads for Colman Dock should infringe on the container terminal.) Alternatives as shown in DEIS would severely curtail the functionality of container operations. T-46 is our smallest operating container terminal, its current acreage represents the minimum space requirement for our tenant. Further loss of space would significantly reduce the terminal's viability for container operations, to the detriment of the local economy. Today, the terminal directly supports 1,366 jobs in the local economy, resulting in \$ 73.4 million in personal income and \$ 69.9 million in state and local taxes annually.

Access to Pier 66 would be maintained throughout construction with the Cut-and-Cover Tunnel and Elevated Structure Alternatives as well.

L-006-013

The lead agencies are proposing to use a large portion of the northwest corner of T-46 as a primary staging area for materials laydown and storage starting at the northern T-46 apron face and using a portion of the apron face at the west corner of the terminal yard. This staging use would require a portion of the container storage area currently used for refrigerated container storage and the demolition of a portion of an existing building on this site. The lead agencies are coordinating with the Port of Seattle on this issue.

L-006-014

- For the design assumptions, the SIG/Whatcom tail track is located on the eastern edge of T-46 on Port property. While this location is compatible with one terminal operator with fully secured terminal operations, other uses may require improved access to the site. In order to ensure that T-46 access will not be directly blocked by train operations on this track, the Port's easement agreement with the City for the tail track requires that the City to relocate it at the request of the Port. Design solutions for the south-end segment must ensure that the tail track does not permanently impede access to T-46.

L-006-015

- We would also like to note that the Port is currently in the process of implementing a \$70 million investment in infrastructure supporting container operations at T-46. Some of the design solutions illustrated in the DEIS would require demolition and relocation of these brand-new facilities.

L-006-016

- SR 519/T-46 intersections and South Segment design—The DEIS illustrates design options for this segment that do not support container operations at T-46. Since the deadline for work included in the DEIS, Port staff have been working with the design team to develop solutions that better address the needs of T-46 as a container terminal. While much progress has been made, further analysis of design and operational details is needed to clarify the impacts on access to the terminal both as a container facility and for potential alternative land uses before a decision can be made. This includes further work on both the aerial and surface options for this segment to determine the best solution for inclusion in the FEIS. We will continue to work with the project team to address the Port's concerns. We require solutions that maintain current levels of operations:
 - Acceptable access for trucks to/from our gates;
 - Retaining a good truck connections between T-46 and north SIG yard; and
 - Retaining good truck access to Argo Yard, Main SIG Yard and the regional highway system.

L-006-017

- The narrative in Appendix U on T-46 includes Parcel 390.1. We believe this parcel actually belongs to the Coast Guard and is not part of T-46. This should be clarified.

L-006-018

- b. Other Port facilities in the South Segment
 - Connections between SR 519 and East Marginal Way also provide truck access to our terminals at T-25, T-18, T-5, and

L-006-014

The Final EIS discusses the reconfigured Whatcom Railyard with the tail track relocated for the Elevated Structure and Cut-and-Cover Tunnel Alternatives. The design for both the Cut-and-Cover Tunnel and the Elevated Structure Alternatives keeps the tail track operational and maintains access to Terminal 46. For the preferred alternative, the Bored Tunnel Alternative, the railyard would not be altered.

L-006-015

The infrastructure improvements at T-46 that were recently made by the Port of Seattle to support container operations were taken into consideration when the latest alignment designs were developed for both the Cut-and-Cover Tunnel Alternative (Conceptual Design Plans, August 2006) and the Elevated Structure Alternative (Conceptual Design Plans, January 2007).

L-006-016

As part of the SR 519 Phase 2 Intermodal Access Project, the FHWA and WSDOT proposed to increase mobility and safety by improving connections between I-5/I-90 and the stadium area, the waterfront commercial interests, the Seattle Ferry Terminal, and the Port of Seattle's container freight terminals. The SR 519 Environmental Assessment (EA) evaluated the Atlantic Corridor Option, which includes:

- Westbound off-ramp from I-5 to I-90 to the current S. Atlantic Street overpass.
- Improvements at intersections of First Avenue/S. Atlantic and S. Atlantic and Occidental Avenue.
- Grade-separated crossings for both vehicles and pedestrians at S. Royal Brougham Way.

FHWA and WSDOT released the SR 519 EA in late 2007. The project was completed in 2010.

L-006-018

the SIG Yard. Good access between these roadways must be maintained.

- As noted above, passenger vehicle and bus access to the Cruise Ship Terminal at T-30 must be retained during and after construction. Peak volumes at this location require a center turn lane.

L-006-019

- We support efforts to dedicate East Marginal Way to freight and local access (for employees and cruise ship terminal access).
- As recommended in the City/Port Access Duwamish study of 1999, further design efforts could evaluate the potential to significantly improve bicycle safety along East Marginal Way if a road-separated bike path were added in the reconfiguration of the SR 99 and Whatcom Yard.

L-006-020

c. **Central: Pier 48**

- The DEIS assumes that the Port will sell Pier 48 to the Washington State Department of Transportation for improvements to the ferry terminal at Colman Dock. This sale has not yet been negotiated, yet the only access currently under consideration uses the P-48 uplands. An evaluation of potential alternatives to this approach is needed.

L-006-021

- We also would like to make sure that the existing public access points—Periscope Park & Alaskan Square—at P-48 will be replaced. The DEIS indicates that Alaska Square Park will be displaced by the viaduct replacement project to provide new access to Colman Dock, Periscope Park will be unaffected by viaduct replacement but displaced by the Colman Dock project. (Appendix H, most alternatives.) Both parks were required mitigation for the T-46 project. Public access provided by these parks must be replaced. If public access provided by Alaska Square Park is not replaced at project expense, the Port must be released from its obligation.

L-006-022

- The project would displace existing tenants at Pier 48, aquatic/vessel uses, and would eliminate a large pay parking lot that is available to the public in an area where parking options are very limited. These impacts should be mitigated.

L-006-023

d. **North Waterfront: Cruise ship operations at Pier 66**

- Our review of the DEIS indicates that the project team has conducted only a limited review of the impact of various design alternatives on cruise ship operations.

L-006-017

The Port of Seattle is the taxpayer of record for blocks 350.1 and 360.1 (766207631 and 7666207695 [Pier 46]), with the exception of parcel 7666207697 owned by King County (outfall at King Street) and parcels on the west edge of the terminal (7666207696, -698, -699) owned by the State of Washington.

Block 390.1-5 is owned by the Coast Guard (parcel 7666207786) (south of S. Atlantic Street, closer to Elliott Bay). The owner is not displayed on the map, and this detailed information is only presented in Attachment D of Appendix Q, Hazardous Materials Discipline Report, in the Final EIS.

L-006-018

The lead agencies have been coordinating with the Port of Seattle to ensure reasonable truck access to the Port terminals at T-25, T-18, T-5, and the SIG railyard during construction. Please also see the response to L-006-016 above.

Local access during construction will be maintained to the cruise ship terminals as discussed in the Final EIS and in Appendix C, Transportation Discipline Report.

L-006-019

East Marginal Way will continue to provide access to Terminal 46 from the south. A shared use bicycle/pedestrian lane would be located along the west side of E. Marginal Way/Alaskan Way S. and would continue north along the west side of the tail track. In the area near Terminal 46, the S. Holgate Street to S. King Street Viaduct Replacement Project will be constructing the Port Side Trail and the City Side Trail, which are shared use bicycle/pedestrian facilities separated from vehicle traffic. The Alaskan Way Viaduct Replacement Project would shift the location of the City Side Trail slightly.

L-006-023

- We are concerned that not all design alternatives for Alaskan Way surface north of Pike maintain a curb lane. The lane is critical for loading and unloading of cruise ship passengers. Through a street use permit from the City of Seattle, our tenants currently have exclusive use of the south-bound, western curb/parking lane in front of P-66 during port calls. During peak loading hours, delivery trucks may be lined up in a north-bound through-lane, waiting to enter our apron. Anecdotally, our staff indicates that during port calls traffic utilizes the capacity of all existing lanes. Further information is available to the project team through the T-30 traffic impact analysis (Heffron Transportation, 2002), or by observing traffic on a cruise ship call day.
- Thus, we urge the project team to re-evaluate current solutions regarding the capacity and design of Alaskan Way surface to ensure adequate access for passengers and deliveries for cruise terminal at Pier 66 and Victoria Clipper at Pier 69.

L-006-024

e. **North Waterfront: Other issues related to Pier 66 (the Port's "Central Waterfront Project")**

- In addition to our first cruise ship terminal, Pier 66 is also home to the Bell Harbor International Conference Center, a restaurant complex, a maritime museum, grocery market, a sandwich shop and several public access viewpoints. Our World Trade Center is located on the east side of Alaskan Way surface. These businesses rely on access along Alaskan Way surface. Both pedestrian and vehicular access is important.
- The DEIS states that "No seawall work is required for any of the alternatives between Blanchard and Battery Streets adjacent to the Bell Harbor International Conference Center." The Port facilities at P-66 sit atop a bulkhead built around 1915, and strengthened in the 1990s with construction of Bell St. Pier. We are concerned, however, about the potential impact of soil strengthening work along Alaskan Way on the stability of our bulkhead. The project team should consult with our engineers on this issue as part of the FEIS process.
- In developing Pier 66, the Port carried out substantial cleanup work along the waterfront. There is a four acre sediment cap and a very healthy habitat mitigation site within the marina. The DEIS indicates that no seawall work will be required in this area. Should ongoing analysis show that seawall work is required at Pier 66, however, care must be taken not to disrupt this area.

L-006-025

L-006-020

The Port of Seattle has sold Pier 48 to WSDOT. WSDOT is currently the owner of this property. See the Final EIS for current information about the project's use of Pier 48.

L-006-021

The Port of Seattle has sold Pier 48 to WSDOT. WSDOT is currently the owner of this property. See the Final EIS for current information about the project's use of Pier 48. Construction workers would park in the upland area of Pier 48, northwest of Qwest Field. A temporary overwater access bridge to the ferries would be built between Pier 48 and Colman Dock (between S. Washington Street and Yesler Way). The temporary ferry access bridge would maintain access and egress for ferry operations. The temporary bridge would not interfere with the Washington State Ferries' planned reconstruction of Colman Dock, it would accommodate a range of potential ferry expansion plans while not requiring any of these plans to be constructed before the seawall construction. This overwater crossing would connect to a relocated ferry holding area east of SR 99.

The project will be responsible for replacement of any shoreline public access facilities that may be displaced. Any displacement of the Port's public access by the Colman Dock Project would be a separate action independent of this project, and the project would not be responsible.

Any displacement of the Port's public access by the Colman Dock Project would be a separate action independent of this project, and the project would not be responsible.

L-006-022

WSDOT is now the owner of Pier 48 and the uses that existed in 2004 are no longer there. Mitigation for the potential loss of some parking

L-006-026

- f. **North Waterfront: Lenora Street Pedestrian Bridge**
- The DEIS indicates that the bridge would be demolished for all alternatives. It also states that it is “not expected to be reconstructed in its current form although pedestrian access to the waterfront may be provided on the corridor. The public seating and waterfront viewing area at the top of the elevator/stairway tower is less likely to be replaced because of the cost of an elevated structure.” (Aerial, Tunnel, Bypass, and Surface alternatives in Appendix H.)
 - This facility is owned and maintained by the Port. The DEIS lists “view enjoyment and relaxation” (p. H-14) as primary uses. More importantly, however, the bridge is subject to a pedestrian easement that was required as part of a street vacation agreement with the City of Seattle. It provides a critical pedestrian connection between the central waterfront and Pike Place Market. It is an integral element of the Port’s Bell Street Pier/Central Waterfront Project and should be replaced. If the bridge is not replaced at project expense, the Port must be compensated and released from its agreement with the City.

L-006-027

- g. **North Waterfront: Pier 69**
- As indicated above, we are concerned that not all design alternatives for Alaskan Way surface north of Pike maintain a curb lane. Similar to cruise ship operations, the lane is critical for Victoria Clipper passenger drop-off and pick-up. Additionally, Seafloor Surveys Inc. leases office space from the Port at Pier 69. The Port of Seattle has its headquarter in that location. Future analysis must address the needs of our tenants and staff.

L-006-028

9. **Environmental impacts**
- a. **Air quality**
- As the DEIS acknowledges, it does not include an air quality conformity determination. Air quality modeling and cumulative analysis conducted for the FEIS should take into account the fact that marine vessel, rail and truck air emissions will need to be factored into a conformity analysis.
- Although the Seattle waterfront and Duwamish area were re-designated from PM-10 non-attainment areas, this area has come close to exceeding the NAAQS during stagnant conditions. If cumulative emissions exceed acceptable levels, emission sources may need to be reduced in the future to avoid operational and economic sanctions associated with NAAQS nonconformity.

spaces along the project route will be provided, but is not anticipated that every space that may be lost will be replaced.

L-006-023

Under the preferred Bored Tunnel Alternative, the City of Seattle is responsible for improvements to the Alaskan Way surface street through a separate project. The Cut-and-Cover Tunnel and Elevated Structure Alternatives include a 10-foot parking lane in front of Pier 66. Adequate street access to the cruise terminal facility at Pier 66 and the Victoria Clipper passenger service at Pier 69 is ensured for both facilities. Access for the bus and passenger vehicles that serve those facilities has been a consideration in the design of the Cut-and-Cover Tunnel Alternative and Elevated Structure Alternative.

L-006-024

Under the preferred Bored Tunnel Alternative, the City of Seattle is responsible for improvements to the Alaskan Way surface street. The Alaskan Way surface street is designated as a primary arterial and major truck route by the City of Seattle. The project team recognizes that it provides the only access to many Port facilities, businesses along the waterfront, as well as to ferry operations at Colman Dock. Vehicular capacity and access to and from the Alaskan Way surface street will be maintained or improved with all build alternatives evaluated in the Final EIS.

L-006-025

The soil improvement work that would take place as part of the Alaskan Way Viaduct Replacement Project next to Pier 66 would be far enough away from the Port’s bulkhead that any impact on the bulkhead would be unlikely.

With the preferred alternative, seawall replacement would occur under a

L-006-028	<p>Thus, future analysis and mitigation must take into consideration that the cumulative impacts of the viaduct project and other emission sources may place constraints on the Port's and tenant operations and activities. It should also include a scenario that gives less weight to voluntary traffic reduction. (See comments under Section A.7. above.)</p>
L-006-029	<p>b. Noise</p> <p>The DEIS provides limited analysis of noise generated by the new facility. We are concerned, however, that there are no baseline measurements for Terminal 46, Piers 48 and 66 or the World Trade Center. We would like to better understand the potential impacts of increased noise on Terminal 46, Pier 48, Pier 66 and the World Trade Center, as well as Pier 69, and request further analysis. Should the final design solution significantly increase noise levels, the project would need to provide mitigation.</p>
L-006-030	<p>c. Parks and recreation</p> <p>Our concerns about the potential loss of public access owned and operated by the Port are outlined above in sections 8.c and 8.f.</p>
L-006-031	<p>d. Fisheries, wildlife, and habitat</p> <p>Potential aquatic habitat compensation actions linked to seawall, tunnel, and Colman Dock improvements are described at four existing Port facilities:</p> <ol style="list-style-type: none"> 1. Pier 70/Myrtle Edwards Park—this is assumed to include Elliott Bay Park as well; 2. Pier 89; 3. Pier 48; and 4. The northeast corner of Terminal 5. <p>However, the Port has also identified these sites for mitigation of its own projects if future Port development requires habitat mitigation. The Port's costs for future mitigation would be much higher if the preferred alternative utilized these sites and the Port were forced to find alternative mitigation sites. Our preference is to retain these sites for Port use. If this is not possible, the project must mitigate these additional costs to the Port.</p>
L-006-032	<p>e. Hazardous Waste</p> <p>WSDOT's analysis has recommended that additional site investigations be completed for certain Port properties. If WSDOT must complete these investigations prior to viaduct construction, Port and tenant operations will be disturbed during investigation and any subsequent remediation. We request that WSDOT clarify timing and investigation requirements because the Port's existing</p>

separate project, the Elliott Bay Seawall Project, led by the City of Seattle.

L-006-026

Under the preferred Bored Tunnel Alternative, the City of Seattle is responsible for improvements to the Alaskan Way surface street. The Lenora Street pedestrian access bridge between Western Avenue and Alaskan Way would be maintained for the Elevated Structure and Cut-and-Cover Tunnel alternatives.

L-006-027

The layouts for the Alaskan Way surface street have been updated for the Final EIS. Both the Cut-and-Cover Tunnel and Elevated Structure Alternatives will maintain two southbound lanes and a parking lane in the vicinity of Pike Street. The Bored Tunnel Alternative does not include the Alaskan Way surface street as part of the project. However, the new street is expected to include sidewalks, bicycle facilities, parking/loading zones, and signalized pedestrian crossings at cross-streets. The ultimate design of Alaskan Way will be determined as part of the City of Seattle's Central Waterfront Project.

While construction activities near Pike Street may impact operations on Alaskan Way, the project will work closely with the Port and waterfront business to ensure reasonable access is maintained during business hours.

L-006-028

The current air quality modeling analysis is presented in Appendix M, Air Discipline Report, of the Final EIS. Marine vessel, rail, and truck emissions are included in the air quality analysis as background concentrations.

L-006-032

operations, and possibly future development of these properties, could be substantially impaired by WSDOT's investigation and analysis.

B. Construction Impacts

L-006-033

The construction impacts for the replacement of the viaduct and the seawall will be massive and should be identified as significant adverse impacts. We understand that the analysis carried out for the DEIS is limited and will be more substantial once a preferred alternative has been identified. Our letter to Secretary Douglas and Mayor Nickels outlines three structured approaches that will allow the Port to comment on the next steps of analysis and negotiate any mitigation needs before the FEIS analysis is completed.

Construction staging and detours will have a major impact on many of our tenants. We have attempted to address their concerns in our comments and will continue to do so throughout the process. However, it will be essential for the project team to contact these tenants and work with them as construction staging, detour and closure plans are developed.

Similarly, the project will require takings under any design alternative. At this point, the impact on the Port is unclear. The DEIS states that a Relocation Plan will be developed as part of the FEIS. We expect the opportunity to review and comment on the plan.

As indicated above, the DEIS contains only a very limited amount of information on construction impacts. Regarding that limited information, we have the following comments:

L-006-034

1. Temporary facilities

The DEIS contains two designs for temporary facilities intended to maintain an "open corridor." Both facilities would have a profound impact on the waterfront. The DEIS contains no analysis of these impacts. In-depth analysis will be needed to understand the implications of each alternative, including cost, corridor traffic flow, and the impact on businesses and traffic flow on the North Waterfront.

a. Broad Street Detour

Specific issues regarding this temporary facility that must be evaluated include:

- Traffic volumes/impact on Alaskan Way surface south of the touchdown.
- Impact on cruise ship access at Pier 66.

L-006-029

Noise impacts are only evaluated in areas with existing noise sensitive land uses. WSDOT and FHWA only consider mitigation measures for existing noise sensitive land uses. The waterfront area south of King Street is an industrial area owned by the Port of Seattle. No noise sensitive land uses currently exist in this area. Please see the Final EIS and Appendix F, Noise Discipline Report, for the current noise analysis.

L-006-030

The Port of Seattle has sold Pier 48 to WSDOT. WSDOT is currently the owner of this property. See the Final EIS for current information about the project's use of Pier 48.

The project will be responsible for replacement of any shoreline public access facilities that may be displaced. Any displacement of the Port's public access by the Colman Dock Project would be a separate action independent of this project, and the project would not be responsible.

Any displacement of the Port's public access by the Colman Dock Project would be a separate action independent of this project, and the project would not be responsible.

L-006-031

If the preferred alternative is selected, replacement of the seawall would occur under a separate project led by the City of Seattle. Similarly, the Colman Dock Project is a separate project. The Port of Seattle will need to coordinate with those projects to address concerns about their proposed compensatory mitigation sites.

L-006-032

Investigation requirements would be based on property-specific parameters and cannot be determined at this time. However, if

L-006-034

- Access to the “north apron” of Pier 69, which provides loading docks and minor on-site parking, including ADA parking.
- Impact on the Victoria Clipper’s operation. Currently, Victoria Clipper ground access relies on a curb lane on Alaskan Way surface adjacent to their loading dock at P-69 for taxi queuing, charter bus parking and loading, as well as private automobile pick-up and drop-off.
- Impact on south-bound movement of traffic from Ballard/Interbay, given that the Broad Street underpass will not be built in advance of this project. The DEIS states that “Southbound traffic from Ballard/Interbay area would travel under the railroad tracks at Broad Street by using an underpass.” (p. 23)

b. **Battery Street Flyover:**

Specific issues to be evaluated regarding this temporary facility include the impacts of the columns supporting the facility on:

- Traffic flow on Alaskan Way surface; and
- Access for our tenants at Pier 66, including the cruise ship terminal loading area, the world trade center, Bell Harbor International Conference Center.
- Impacts to other waterfront businesses and residences.
- Construction duration

L-006-035

2. **Analysis of “closed corridor” impacts**

a. **Analysis of SR99 closure**

In our July 2002 comments, we indicated that it is critical that the existing viaduct continue to operate until the replacement is complete. We made this statement because of the magnitude of the likely impacts of full closure for all through traffic on SR 99. However, analysis carried out for the DEIS indicates that maintaining traffic flow on SR 99 throughout the entire construction period significantly adds to project costs and construction duration. It would be valuable to evaluate the potential effects of a full closure of both the entire corridor and individual segments of the corridor for the entire construction period and determine the trade-offs associated with this approach. The analysis should include, but not be limited to the impacts on:

- Project cost;
- Construction duration;

necessary, explorations or other testing can be conducted at night or on weekends, which would minimize potential impacts to ongoing operations. Remedial activities, if necessary, could be accomplished during construction or could be designed to accommodate ongoing operations at the facility.

The statement “Site investigations, if necessary, will be coordinated with the property owner” has been added to the site investigation discussion Section 6.8.2 Recommendations for Further Investigations, Phase II ESA Recommendations of Appendix Q, Hazardous Materials Discipline Report, of the Final EIS. As stated in Appendix Q, Attachment H-1, focused environmental sampling at Terminal 46 may be performed in conjunction with geotechnical design. The only Port property identified for investigation is part of Terminal 46 that would be acquired for tie-backs. No remediation is anticipated. As stated in Section 6.8.2, investigations will be coordinated with the property owner.

L-006-033

Your comments are noted. Please see the Final EIS for the current construction plan for each build alternative, discussion of the expected construction effects, and presentation of proposed mitigation measures to address project effects.

L-006-034

When the Draft EIS was issued, construction planning was at a very early and conceptual stage. The analysis has advanced substantially since that time, and an evaluation of the effects of the Broad Street Detour that is part of the construction approach used with the Elevated Structure Alternative, is discussed in the Final EIS. This evaluation includes more detailed traffic forecasting and operational analysis. The lead agencies recognize the importance of maintaining adequate access for the cruise ship operations at Pier 69 and will continue to coordinate with the Port of Seattle as the construction

L-006-035

- Traffic flow on regional transportation system and local arterial streets, and related socio-economic costs;
- Businesses on the waterfront, including our tenants at T-46 and Piers 66 and 69; and
- Any other trade-offs.

L-006-036

b. **Analysis of periodic SR 99 closures**

- Similarly, even periodic closures as described in the DEIS—especially closures with several weeks of duration—would have a significant impact on the regional system and on our tenants along the waterfront. More substantive analysis will be needed. This includes in particular the impacts on Hanjin’s operations at T-46 and cruise ships at P-66 and T-30:
- Should the corridor be closed for prolonged periods, it would be critical for freight mobility that general-purpose traffic be channeled through the Duwamish on 1st and 4th Avenues South. This would allow East Marginal Way to be dedicated to local access to adjacent properties and terminals (including the US Coast Guard), as well as to drayage operations between container terminals and the intermodal rail yards.
 - Cruise ship port calls occur during the summer (between May and October) and mostly on weekends. These are the times when, according to the DEIS, periodic closures would occur. Future analysis must evaluate the impact on cruise ship operations.

L-006-037

3. **Coordination with other projects**

The DEIS contains almost no information on other projects that may be under construction at the same time. This includes the Monorail, I-5, Spokane Street and other projects on city streets, the Ferry Terminal, Sound Transit light rail, and many other projects. Constrained operation or periodic closures of SR 99 during construction will put additional pressure on an already stressed regional system. The cumulative impact of closures and detours related to any of these other projects, both within the study area and on the regional system, could be crippling. This would have a major impact on the ability of the region to do business. We encourage advance construction, fast-tracking to complete other projects in the corridor before construction starts. If that is not possible, we urge you to work with other projects to minimize the cumulative impacts associated with other projects under construction at same time. We will work with the project team to ensure that the impact on our tenants and port operations is minimized.

planning advances.

The Battery Street Flyover Detour has been eliminated from further consideration.

L-006-035

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

L-006-036

A detailed analysis of traffic operations during the construction period is included in the Final EIS for the alternatives. As noted in your comment, the 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing

L-006-037

The DEIS also lists redevelopment of T-46 for alternative uses as a project that could occur during the same time as replacement of the viaduct and seawall. At this time, the Port is committed to Hanjin, our current tenant, and its success in operating T-46 as a container terminal. Our primary goal is to ensure that access to T-46 is preserved in a fashion that is supportive of container operations.

L-006-038

4. Capacity and functionality of rail operations

- As stated earlier (see section A.4.), to maintain the functionality of all three container terminals, the capacity and efficiency (“adjacency”) of rail operations in the harbor cannot be reduced. This applies to the construction period as well.
- The tail track, and its existing length, is required to maintain railroad operations. Construction activities, staging and detours must be designed to maintain the track without interruption.
- Demolition and construction of the central segment will occur very close to the north portal of the downtown rail tunnel on the BNSF mainline. The portal must be protected to ensure the safety and reliability of rail operations for freight and passengers on the mainline.

L-006-039

5. Freight mobility

a. Separation of freight and general-purpose traffic

We support the project team’s intent to focus general-purpose traffic on 1st and 4th Avenues and dedicate East Marginal Way to freight and local access. This will help maintain the functionality of T-46 as container terminal and support cruise ship operations at T-30. We are concerned, however, that traffic impacts generated by use of East Marginal Way as a haul route may impact access to our properties along East Marginal Way. A thorough analysis will be needed.

L-006-040

b. Provisions for truck movement

The DEIS outlines some of the impacts of construction on freight mobility but does not evaluate truck detours and alternative routes sufficiently. We are concerned that there are no reliable alternatives to the SR 99 corridor in the city. This is particularly important for over-legal trucks and trucks carrying flammable materials. The DEIS indicates that Alaskan Way surface would be reduced to one lane in each direction; rail crossing and pedestrian/bicycle conflicts will reduce speed and reliability. Trucks longer than 27 feet are currently prohibited from the downtown core between 6:00 am and 6:00 pm. We urge you to develop alternative truck routes and provide for improvements on local truck routes in advance of construction to mitigate some of

the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

In the current construction plans for the build alternatives, freight movements are emphasized on East Marginal Way, and general-purpose traffic and transit are largely directed to First Avenue, Fourth Avenue, and other corridors to the east. Throughout the construction period, local access will be maintained to the cruise ship terminals.

L-006-037

The Final EIS describes the cumulative and secondary impacts of the Alaskan Way Viaduct Replacement Project. It also discusses the specific projects that are likely to be under construction during some portion of the project’s construction period and are likely to be affected by the project’s periodic and longer-term closures of SR 99 and potential detours through the corridor. Also discussed is the ongoing coordination that is occurring now and will continue during construction to minimize the cumulative and secondary impacts that are expected.

A detailed description of the proposed traffic mitigation measures can be found in Appendix C, Transportation Discipline Report, of the Final EIS.

L-006-038

The project team has coordinated continuously with the Port of Seattle to

L-006-040

these impacts. This may include reevaluating the truck restrictions in the downtown core.

L-006-041

c. **Impacts on east-west corridors**

The DEIS does not adequately identify the impacts of construction to east-west corridors in the Seattle. According to the DEIS, the projected loss of capacity, increase in travel time, and reduction in access points in the SR 99 corridor will shift trips—including truck trips to and from BINMIC—to I-5 and other north-south arterials already experiencing severe congestion today. This could have major impacts on the east-west routes used to access these other north-south corridors, including Spokane Street, Lander Street, SR 519, the Mercer/Roy Street corridor, Nickerson Street, and N 39th Street. The FEIS should document the impacts on these facilities and mitigate them.

L-006-042

6. **Access and impacts to Port Properties**

The DEIS alludes to use of Port property for staging and other purposes during construction. We anticipate working with the project team where temporary use of Port property may be required, and to negotiate temporary construction easements from the Port and our tenants. Where construction would adversely impact access for the Port and/or its tenants, we will need to negotiate access and mitigation with the project team.

We are also concerned about the following issues:

L-006-043

a. **Lane reductions on East Marginal Way and Alaskan Way surface**

The DEIS indicates that East Marginal Way and Alaskan Way surface would be reduced to one lane in each direction from S Massachusetts to Broad Street for much of the construction period for most alternatives. We are concerned about potential impact of increased traffic on East Marginal Way on our container terminals, the cruise terminal at T-30, and Horton Street Maintenance Shop. Passenger and delivery access to T-30, truck access to T-46 and drayage movement to the railroad yards, passenger and delivery access to Piers 66-69 must be maintained.

L-006-044

b. **Utilities and public services**

The DEIS discusses construction impacts on utilities and public services and states that “most impacts for the Tunnel Alternative” occur in the south end from Spokane to King. It also warns about potential unplanned interruptions or accidental disconnections (p. 25). We are concerned about the risk to our facilities, in particular T-46, T-30, and the SIG Yard. These facilities require uninterrupted service.

to minimize both short- and long-term effects on freight rail operations and container terminal access. The Port of Seattle and other stakeholders have been directly involved in design efforts not only for the current alternatives analyzed in the 2011 Final EIS, but for the S. Holgate Street to S. King Street Viaduct Replacement Project which provides an aerial overcrossing at S. Atlantic street to accommodate east-west traffic flow when rail cars block the at-grade roadway. This project also provides an aerial connection with East Marginal Way S., allowing for increased north-south mobility through the project area.

The project design team is currently coordinating with the Port of Seattle as the design and construction planning becomes more defined.

L-006-039

In the south sub-area, the primary construction material haul route would likely use the area around the southbound WOSCA detour off-ramp to S. Atlantic Street. Southbound haul egress would be provided on the existing ramp (which connects to the WOSCA detour). Northbound ingress would feature a temporary adjoining roadway from S. Atlantic Street connecting to the southbound on-ramp at about S. Charles Street. Over-legal loads to the south end of the project area would likely travel via SR 599 to First Avenue S. to the job site. Over-legal loads traveling within the city are required to obtain a special permit, and appropriate routes are selected via the permit approval process.

Alternate routes to port facilities along the waterfront would be via Alaskan Way or exit at S. Spokane Street. Northbound trucks on East Marginal Way S. would be required to use S. Atlantic Street and the East Frontage Road (or First Avenue S.) because Alaskan Way S. would be closed from S. Atlantic Street to S. King Street. A northbound on-ramp to SR 99 would be provided at the S. Royal Brougham/East Frontage Road intersection. A more in-depth discussion of mobility, including freight, is provided in Appendix C, Transportation Discipline Report.

L-006-045

c. Access to T-30 and T-46

The location of construction staging areas and detours in the south-end could potentially have a major impact on both our cruise ship terminal at T-30 and container operations at T-46. Staging areas and detours must be designed to maintain unimpeded access to T-46. The long-term effects of losing Hanjin to another port because of negative impacts from construction on access to the terminal are unacceptable.

L-006-046

d. Access to Pier 66 for cruise ship operations

The FEIS must address passenger drop-off and delivery access to the cruise terminal at P-66 during construction. The DEIS states that "locations for pedestrian access and bus and taxi cab pick-ups will likely move around throughout construction to accommodate construction activities." (P-95) There appear to be no provisions for curb space. We are concerned that these factors will make it very difficult to maintain cruise ship operations at P-66. Cruise ships make a significant contribution to the local economy. It can be lost if cruise operators move their vessels to a different harbor to avoid access problems due to construction. More work will be required to ensure adequate access during port calls. (Please see also the discussion on cruise ship access needs under Section A.8.d.)

e. Access to Pier 66 in general

Other tenants at Pier 66, at the World Trade Center on the east side of Alaskan Way, and along the waterfront may also be severely impacted. We are concerned about the impacts of the viaduct/seawall project on their business livelihood and access.

f. Access to Pier 69

We are also concerned about access to Pier 69 during construction, both for our tenants and our staff. The Victoria Clipper also requires access for passenger drop-off and deliveries and depends on a curb/parking lane.

L-006-047

7. The Flexible Transportation Package

The Port supports the project's aggressive traffic management program encouraging alternative modes of transportation. However, we cannot support the truck restrictions the DEIS mentions as a possible component of the package. Freight mobility should not be curtailed to maintain capacity for single-occupant vehicle travel. Much of the movement of trucks destined for warehouse and distribution centers is based on strict schedules that support just-in-time deliveries. Many of these facilities, and our own terminals have coordinated schedules. If trucks were, for

L-006-040

The project team is committed to working with the Port and the freight community to develop alternative freight routes and strategies to address freight concerns during the construction period. Additionally, WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

L-006-041

Additional traffic analysis has been completed specifically targeting construction-related impacts, including impacts to east-west arterials. The results of this analysis, plus a list of mitigation measures for reducing travel demand and traffic congestion on key freight routes, are included in Appendix C, Transportation Discipline Report, of the Final EIS.

L-006-042

The lead agencies will coordinate staging activities and the use of affected properties with individual property owners prior to construction. This coordination will include negotiations for potential easements, temporary uses of parcel areas, and access needs for each affected property.

L-006-043

The project team is committed to work with the Port and the freight community to develop strategies to maintain access into and out of the port terminal facilities. To help reduce congestion on East Marginal Way, the project is proposing that this roadway be open only for freight and construction-related traffic (haul route).

Further details about the performance of the Bored Tunnel Alternative (preferred alternative) and construction mitigation measures can be found in the Final EIS Appendix C, Transportation Discipline Report.

L-006-047

example, forced to operate at night, a significant portion of the supply chain would be forced to change hours of operation as well. We are also concerned that the mode split that is assumed for the construction period may not be achievable. We encourage the project team to more thoroughly evaluate this issue and will work with the team to develop a package that provides for adequate freight movement for inclusion in the FEIS.

L-006-048

8. Environmental issues

a. Air quality

- The DEIS correctly notes the current attainment status of the region, however, this area has come close to violating the National Ambient Air Quality Standards for ozone and particulate matter during adverse weather events. Increased PM_{2.5} emissions due to diesel construction equipment and traffic congestion could jeopardize the region's attainment status.
- Emissions from construction could leave little room in the airshed for other projects. The project must mitigate adverse construction impacts as necessary to allow for development of other projects given constraints in the region's air quality.
- The FEIS should address cumulative impacts of construction related tailpipe and fugitive emissions from concurrent projects and from increased congestion and should evaluate air toxics impacts of construction. It should also include mitigation to address adverse impacts, including phasing where possible.
- We endorse minimizing diesel particulate emissions as described on Page 72 of Appendix F. A design that does not improve the current and projected no build levels of service will most likely compromise air quality in the future unless provision and use of adequate transportation alternatives coupled with VMT-reducing land use decisions are assured.
- Vehicular emissions estimates seem to assume emissions are all re-entrained road dust (Page 21, Appendix Q). The analysis does not take into account primary particulates from the vehicles nor emissions of NO_x and SO_x that contribute to secondary nitrate and sulfate PM₁₀ in ambient air.
- The magnitude of the construction emissions and emissions from traffic congestion during construction are essential to the cumulative impact analyses, which should include a scenario that gives less weight to voluntary traffic reduction. We request review and comment of these analyses before they are final.

L-006-044

The comment has been noted that maintaining uninterrupted service to Port of Seattle container yards T-30 and T-46 and the SIG railyard is very important. Please see the Final EIS and Appendix K, Public Services and Utilities Discipline Report, for current project information about how construction of each build alternative could affect public services and utilities and what mitigation measures are proposed to avoid or minimize the effects.

L-006-045

The project team recognizes the importance of maintaining access to the Port of Seattle terminals during the construction period and for the longer term, even though the Port cruise ship terminal has been moved north to Terminal 91, further from the potential construction staging areas and construction detours. It is the policy of the project to maintain access to all Port facilities during project construction.

The project team continues to work with the Port of Seattle to understand access needs and take steps to accommodate them in the best manner possible as more detail on construction staging and project phasing become available.

L-006-046

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

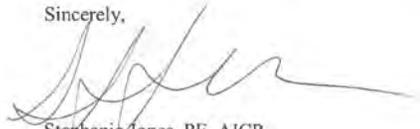
L-006-049

b. Noise

We are concerned about the impacts of construction noise on Terminal 46, Pier 48, Pier 66 and the World Trade Center, and Pier 69. Should noise from construction activities impact existing uses at these or other facilities owned by Port, the project would need to provide mitigation.

Thank you again for the opportunity to participate in this project and comment on this Draft Environmental Impact Statement. We look forward to continuing work with your project team to define and fund a project that will replace the SR 99 Viaduct and the City's aging seawall. Please do not hesitate to contact me at 206-728-3818, or Christine Wolf, our new Regional Transportation Program Planner for the Seaport, at 206-728-3458, if you have any questions.

Sincerely,



Stephanie Jones, PE, AICP
Manager
Seaport Strategic Planning and Policy
Port of Seattle

L-006-047

The project team is committed to working with the freight community to explore opportunities to mitigate construction related impacts.

Since the publication of the Draft EIS, the project team has continuously worked with the Port and members of the freight community to ensure their interests are heard and reflected in the transportation planning process for construction. Measures for managing mobility and access for freight during construction are found in the Final EIS Appendix C, Transportation Discipline Report. In addition, WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

L-006-048

Since the publication of the Draft EIS, the project area has been reclassified as in attainment for ozone. The revised PM10 analysis conducted for the Final EIS follows FHWA's guidance for qualitative hot-spot analyses. Under this approach, the quantitative estimation of emissions is not necessary. Please see the current air quality analysis for this project in Appendix M, Air Discipline Report, of the Final EIS.

A Memorandum of Agreement (MOA) is in place between WSDOT and the Puget Sound Clean Air Agency (PSCAA) to help eliminate, confine, or reduce construction period emissions for many larger and longer term projects in Washington State. This MOA would apply to the Alaskan Way Viaduct Replacement Project. Mitigation measures during construction of the project are shown in Appendix M of the Final EIS.

L-006-049

Project noise effects and proposed mitigation measures are described in the Final EIS and Appendix F, Noise Discipline Report.



May 28, 2004

Allison Ray
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104

RECEIVED
JUN 01 2004
AWVSP Team Office

RE: Alaskan Way Viaduct and Seawall Draft Environmental Impact Statement

Dear Ms. Ray:

The Puget Sound Regional Council appreciates the opportunity to comment on the Alaskan Way Viaduct and Seawall Replacement Project Draft Environmental Impact Statement (DEIS). The project represents a significant step toward implementing the region's long-range growth management, economic, and transportation strategy, VISION 2020, and the Metropolitan Transportation Plan, Destination 2030, through the preservation of a key transportation corridor and the enhancement of one of the region's major urban centers.

The first portion of this letter provides comments on the DEIS. The comments primarily concern regionally significant land use and transportation issues. The second portion of the letter summarizes the process and steps to be taken to advance the Alaskan Way Viaduct and Seawall Replacement project from a Candidate project to an Approved project in Destination 2030. This is a necessary step before purchasing right-of-way and initiating the construction of facilities.

Destination 2030, the long-range regional transportation plan, includes and generally describes the preservation needs in the Alaskan Way Viaduct corridor. The project, as currently described in Destination 2030, is based on the Washington State DOT's direction to the Regional Council at the time of plan development.

However, in order for the project to be fully incorporated into Destination 2030, the project sponsor will need to take steps to advance the project from its current status of "candidate project" to "approved project." Also, once the FEIS is complete for the project, the sponsors should submit a revised project description to be used in refining, or amending the current project description in Destination 2030. This will update the information in the regional plan and provide consistency with the decisions identified in the FEIS.

L-007-001

Part 1: Comments on the DEIS

Regional Policy Context

As you know, we have a broad vision for the region's future, called VISION 2020. It's a coordinated, long-range vision that balances competing interests, and lays out a growth management, economic, and transportation strategy. A key strategy of VISION 2020 is to focus growth in urban centers. These are locations that offer transportation, housing, employment, shopping, services, and amenities choices for residents and visitors. VISION 2020 describes the community space objectives for centers in the following manner "*central gathering places and open spaces, such as parks, plazas and landscaped areas, are included and located to be accessible and complement other land uses.*" (p. 85)

We can see VISION 2020 taking shape on the ground through the development of urban centers and the region's incremental steps to link them with a multi-modal transportation system. If VISION 2020 is to continue to be successfully implemented, the responsible implementing agencies must define and address problems in a comprehensive manner and look for creative, innovative solutions. Lead agencies need to identify solutions that address the wide range of interests and objectives that are often embodied in complex urban projects.

VISION 2020 attempts to point the way with policies such as:

- RG – 1.4. "*Promote design that preserves community character and livability, creates lively and people-oriented areas, and supports transit, pedestrian and bicycle access.*"
- RO – 6.1. "*Conserve and enhance the region's natural resources and environmental amenities while planning for and accommodating sustainable growth.*"
- RE – 7. "*Foster economic opportunity and stability, promote economic well-being, and encourage economic vitality and family wage jobs while managing growth. Support effective and efficient mobility for people, freight, and goods that is consistent with the region's growth and transportation strategy.*"
- RE – 7.7. "*Support investments in community services, infrastructure and amenities that promote sustainable economic activity within centers.*" The economic strategy goes on to stress "*the importance of enhancing the viability and sustainability of centers and compact communities through the provision of adequate housing and employment opportunities, investment in services and*

L-007-001

Vision 2020 has been updated since the Draft EIS. FHWA, WSDOT, and the City of Seattle continue to strive to develop and design the project in a manner consistent with PSRC's updated plan *Transportation 2040* policies and design guidelines. Thank you for your comments, specifically regarding the Draft EIS. The lead agencies recognize the opportunity we have to redefine the waterfront and the SR 99 corridor.

L-007-001

amenities that promote economic activity, and development of a efficient transportation system."

- RT – 8.3 *"Maintain and preserve the existing urban and rural transportation systems in a safe and usable state. Give high priority to preservation and rehabilitation projects which increase effective multimodal and intermodal accessibility, and serve to enhance historic, scenic, recreational, and/or cultural resources."*

Destination 2030, the Metropolitan Transportation Plan, also provides guidance to the Viaduct Project. *Destination 2030* states the following.

"Transportation improvements and programs must be focused on establishing a more balanced transportation system, shifting emphasis from movement of vehicles to movement of people and goods. A balanced system provides travel options that include choices for private vehicles, public transit, ridesharing, walking, biking, and various freight modes." (D2030 page 4)

Destination 2030 also contains 10 physical design guidelines (p. 37). *"The guidelines are intended to advance fundamental design principles and site development characteristics that can serve as a starting point to achieving successful and mutually supportive connections between land use and transportation."* The following three guidelines are particularly relevant to the Viaduct project:

- #3 – *"Link neighborhoods, connect streets, sidewalks, and trails."*
- #6 – *"Design for pedestrians and bicycles."*
- #7 – *"Provide usable open spaces for the public."*

It is through this policy lens that we offer the following comments on the information that is contained in the DEIS.

Document Format

The Alaskan Way Viaduct and Seawall Replacement Project Draft Environmental Impact Statement (DEIS) summary document is a very readable and accessible document. The innovative design and discussion format is to be applauded.

Urban Context

This project represents a rare opportunity to design a solution that recognizes this land as a unique resource in the region's largest urban center. Once the project is completed, we will have to live with the results for many years to come. The project needs to make maximum use of the opportunity.

L-007-002

The purpose and need statement in the DEIS reflects the expectation that the project would largely be a replacement, or corridor preservation project. Consistent with the purpose and need statement, the build alternatives will improve facility access and egress, bring facilities up to current design standards and improve connections to other regional transportation facilities, such as SR 519.

This project has the potential to greatly enhance the character and livability of downtown Seattle. The alternative analysis is focused, however, on the motorized vehicle capacity and seawall replacement issues and provides only limited assessment of the many other functions that take place on this important land. While providing urban design and development direction may be outside the scope of review, we believe that the EIS should explain how the analysis of alternatives reflects the wide range of interests and functions associated with this urban land use setting. This is supported in the goals and objectives section following the purpose and need statement under the heading "Seattle's Plans for the Downtown Waterfront" (page 168). While addressing alternative ways to meet the transportation objectives for the area, the EIS should address how the alternatives help to accomplish the other needs and objectives. For example, how can this project physically and visually reconnect the waterfront to the rest of downtown, add open space and public amenities, provide increased opportunities for housing and mixed use developments, strengthen the attractiveness and unique characteristics of the area for tourism, enhance shoreline habitat?

L-007-003

Corridor Improvements

It appears that some of the build alternatives may add considerable capacity within the corridor, particularly by adding lanes via the surface treatments. The EIS should contain a descriptive summary of vehicle capacity measures (such as total lane miles within the study area) for the existing facility and for each of the build alternatives. Ultimately, if the project were to evolve into a broader examination of mobility improvements in the defined corridor, as opposed to a roadway preservation project, additional strategies might warrant further consideration, such as: the addition of HOV lanes, improvements that could be done to downtown streets and connections to better carry north/south traffic, and investments in travel demand strategies in the corridor.

L-007-004

Parallel Improvements

No alternative examines major operational improvement strategies for parallel surface facilities through downtown Seattle. It is possible that a strict commitment to replacing all existing functionalities could limit the design development for a generally functional Seattle waterfront corridor given real cost and right-of-way constraints. For example, is streetcar replacement justified in all alternatives given low ridership and sizable right-of-way requirements (12" to 13" buffers on each side of the streetcar)?

L-007-002

These considerations are included in the evaluation of alternatives that meet the project's purpose. The evaluation is contained in the Draft, Supplemental Drafts, and this Final EIS.

L-007-003

Net increases in overall capacity are small under any of the alternatives, and some alternatives evaluated in the Draft EIS reduced overall capacity (Surface Alternative). The Alaskan Way surface street is expanded under several alternatives, but this is in response to reductions in lanes or ramps on the mainline. For example, mainline SR 99 has fewer lanes under the Bored Tunnel Alternative than it does today. This reduction is offset by an increase in lanes on surface Alaskan Way to accommodate downtown trips and a rearrangement of ramp locations to better distribute traffic on the mainline.

A comparison of lane-miles was not conducted since combinations of surface arterials and limited access lanes comprise each alternative, and the carrying capacities of these facilities can vary widely. Please see the Final EIS Appendix C, Transportation Discipline Report, for updated analysis of the three build alternatives: the Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure.

L-007-004

Opportunities to improve or develop alternate corridors are limited by the lack of parallel routes, the densely developed setting, and competing needs/uses on alternate routes. Opportunities on alternate corridors were considered prior to initial screening and again during transportation planning for the construction period.

L-007-005

No Action Analysis

The no action alternative, evaluated for comparative purposes, involves the continued operation of the existing structure in 2030. This results in a comparatively conservative assessment of the operational/performance benefits of the build alternatives. Yet, our read of the DEIS suggests that the two versions of a No Build Alternative where the current facility is no longer operational are possible scenarios, especially considering the speculative nature of project funding. The EIS should indicate how the potential environmental impacts resulting from a non-operational Alaskan Way Viaduct are to be fully understood and addressed.

Page 12 of Appendix C states that the 2030 Baseline assumptions include funded projects, and that unfunded facilities are not included. Yet, it appears that the 2030 Baseline modeling scenario (No Build) includes some projects that are not currently funded (listed on page 13 of Appendix C), including the Sound Transit Link Light Rail segment that terminates at Northgate and the Washington State Ferry system expansion of Coleman Dock (appears to go from 3 to 4 auto ferry slips). These projects should be removed from the No Build Alternative, or clarification should be provided regarding the differences between the 2030 Baseline and the alternatives.

L-007-006

Finally, it would be helpful if the EIS contained a line drawing (Appendix W), in addition to the shown cross-section, of the existing structures that would be operational in a future no-build scenario. This would allow a direct comparison of facility configuration and roadway-engineering improvements that will be part of the rebuild option.

L-007-007

Cost breakdown for Sub-elements of the Project

Costs should be broken out by categories or groups of investments to facilitate an understanding of the various corridor elements. Appropriately, the Alaskan Way Viaduct corridor has been construed more broadly than simply the elevated facility at risk of failure resulting from a major seismic event. At a minimum, all alternatives, and the resulting "project", appear to include the Seattle Seawall replacement, surface street improvements, temporary structures erected during construction, Viaduct replacement structures (varying by alternative), and the Coleman Dock expansion.

L-007-008

Economic Analysis

Since the successful preservation of this transportation corridor is important to the region's economic future, a fully developed economic analysis of the alternatives is warranted. Economic analysis is not directly required under the State Environmental Policy Act or the National Environmental Policy Act. However, it is certainly best practice to perform formal analysis, such as benefit cost analysis, prior to a decision on a preferred alternative. This analysis might be undertaken outside of the environmental review process, but shares the common aim of providing information that is relevant to the decision process. Destination 2030, the region's long-range transportation plan,

L-007-005

The Final EIS analyses the Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure Alternatives. In addition, the Viaduct Closed (No Build Alternative) is carried forward as required by environmental regulations to provide baseline information about conditions in the project areas if nothing were done. These alternatives are fully described in Chapter 3 of the Final EIS.

The project baseline assumptions for 2030 have been updated for the Final EIS. The Transportation Discipline Report, Appendix C, Chapter 2 Methodology and Chapter 5 Operational Effects, Mitigation, and Benefits, respectively, explain how the 2030 No Build Alternative was modeled and how transportation and land use could be affected.

L-007-006

A drawing comparing the width of the current design for the Elevated Structure with the existing viaduct structure is included in the Final EIS.

L-007-007

Although costs are an important part of project planning and decision-making, they are purposely not part of the environmental review process. Overall project costs are included with the overall project description and are used by the economic impact analysis. Cost estimates by project element were used by the lead agencies in developing the preferred alternative. It should be noted the Colman Dock project is a separate project and its costs are not included with this project's costs.

L-007-008

A cost-benefit analysis is not warranted for the project because economics are not a direct component of the project's purpose and need. The purpose and need reflects the project lead agencies' desire for a

L-007-008

contains the following language relating to economic analysis on project status in the plan.

Destination 2030 utilized least cost planning analysis as input to regional decision processes. In addition, all major "Candidate" projects must conduct and document an enhanced benefit-cost analysis (appropriate to the scale and complexity of the study) that considers reasonable full public and private costs of transportation in its environmental analysis leading to a decision on a preferred alternative or option.

--Appendix 6

A formal economic assessment, recognizing opportunity costs and quantifying user benefits, is the preferred way to estimate the economic viability of this type of project. The assessment of economic impacts associated with the project construction is handled responsibly within a traditional input-output framework. However, this tells us very little about the economic viability of the project itself or the relative economic importance of project alternatives. For example the same construction multipliers effects would result from an alternative project, with equivalent federal participation, regardless of the nature of the construction project. A project that is economically important will in fact change production functions in some small way.

The input-output analysis recognizes that only new dollars represent net contributions to the regional economy. For consistency, the same perspective should be applied to the measure of sales tax impacts.

In addition to the project capital and operating costs, the substantial economic impacts of construction will relate to the business disruption during the prolonged construction period associated with any build alternative. It was not clear that these economic impacts were formally quantified in the DEIS. As they are quantified, they should be included in formal economic analysis in a manner that can aid the decision-making process.

Construction Impacts and Duration

L-007-009

The reader should be able to determine the added or avoided costs (business impacts, cost of temporary structures, travel delay costs, pedestrian impediments, construction staging efficiencies/inefficiencies, environmental impacts of temporary aerial structures, etc.) of keeping through lanes open in the corridor through the construction period. As referenced above, the construction timeline for any build alternative is substantial, as much as 11 years. It is our understanding that, in part, the assumptions governing analysis of the construction period include partial operation of the existing or temporary replacement structures, as described in the purpose and need statement. Alternative construction approaches probably need to be evaluated, including those that do not provide partial, but continuous, through vehicle capacity in the corridor. Essentially, the question of what construction management approaches to be employed requires a more detailed assessment of various strategies, their timelines, costs, and localized economic

safer transportation facility that will maintain or improve mobility, accessibility, and traffic safety. The cost of not maintaining the current benefit of a north-south traffic corridor would be the costs associated with increased congestion as the existing 110,000 vehicles per day use alternative routes. Economic viability is not the appropriate benchmark for public infrastructure projects, especially this project that has such a strong public safety component.

Sales taxes would not be new dollars, as the funds to pay sales taxes would originate either within the Puget Sound Region or within the state (from the funds collected to construct the project). In essence, the project trades gasoline taxes for sales taxes; the result is a transfer of gasoline tax income (collected within Washington State) into individual city and county coffers (collected within Washington State). These are still funds that originate and are spent within the state. In the absence of this project, the gasoline taxes would still be spent on other highway and roadway projects within Washington State, thereby generating their own sales taxes.

An economic analysis for individual businesses is not feasible. Impacts were evaluated by separate business districts, as appropriate, that share common economic characteristics such as location, reliance on on-street short-term parking for customers, business size, and access. Assessments of the total value of individual businesses are typically not found within publicly-available information. Evaluations of an individual business' ability to continue operating during the prolonged construction period would be speculative, would rely on information that may not be able to be independently verified, and would be subject to economic forces beyond the direct control of the project. For these reasons the economic analysis limited itself to identified business districts as the smallest division for analysis.

L-007-009

and environmental impacts. We could not find a complete assessment of quantifiable construction related impacts for the construction scenarios outlined in the EIS summary document and technical appendices.

In addition, as a preferred alternative is developed, we expect that a detailed construction management and mitigation plan that covers the above categories of impact will be put in place that reflects significant public involvement.

Transportation Operational Analysis

L-007-010

The analysis in the transportation technical appendix is not clear enough to allow a reasonable assessment of the appropriateness of the analysis, verify the uniform treatment of alternatives, or draw unambiguous conclusions about operational deficiencies or benefits across alternatives. Examples include the following:

- Does the sum total of all the various modeling approaches result in an assumption of near total inelastic demand, not just for trip generation, but for all meaningful aspects of trip behavior such as origin and destination parings? Is the reader to conclude that alternatives with similar surface configurations will result in dramatically different surface network operating conditions? If so, does this reflect best professional judgment relating to human behavior, or the application of state-of-the-art modeling techniques? If professional judgment and modeling results diverge, how is the reader to reconcile the two? These are particularly important questions when build alternatives represent widely varied approaches to corridor investment.

L-007-011

- Even the technically literate reader is unable to disentangle the elements of the methods employed sufficient to reconstruct the analytical design. It is unclear how the combined use of the regional travel demand model with CORSIM and Synpro has contributed to an appropriate description of operational issues associated with different alternatives. So, for example, it is difficult to eliminate the possibility of the unintended introduction of analytical bias. This ambiguity is compensated for with statements like the following:

This methodology results in conservative establishment of detailed traffic estimates for analysis and decreases the likelihood (and potential magnitude) that operating conditions for 2030 were overstated. (Page 15)

But one is still left wondering what this means. How are the words "conservative" and "overstated" to be interpreted?

L-007-012

- The transportation report contains numerous measures of effectiveness (beginning on page 19), but there is considerable overlap across the various measures: traffic density, speeds, hours of delay, traffic distribution, and volume to capacity ratios.

L-007-009

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

L-007-010

The analysis employed makes use of standard and accepted tools and practices available to transportation planners. Travel forecasting was conducted using a version of the regional travel demand model developed by the Puget Sound Regional Council. This tool is used to estimate forecasted conditions for all major projects in the four-county Puget Sound region. While some elements of the model are fixed (population and employment forecasts, for example), the model is not inelastic in nature. Travel choices are based on relationships between travel opportunities and costs. Hence, fewer trips are forecast in the study for reduced-capacity alternatives than for higher-capacity alternatives (see screenline tables). The traffic projections are based on travel demand modeling using the PSRC's regional model and are confirmed by professional judgement. Please see the Final EIS

L-007-012 | How will the peak hour operational findings get incorporated into a more comprehensive assessment of alternative viability, or effectiveness analysis? Two important questions remain: How will the costs and benefits of the alternatives be expressed in manner that allows comparison (not merely peak-hour measures of effectiveness) and avoids the pitfalls of multiple and non-exclusive measures? And how will the measures be utilized as part of the development of a preferred alternative? The DEIS appears to be silent on these important issues.

L-007-013 |

- It is unclear how traffic impacts from the expanded ferry terminal facilities (diagrams in Appendices W and X appear to display a terminal with four auto slip and two passenger ferry slips) are treated in the operational analysis of the build alternatives. Do these methods differ from a no-build alternative that includes ferry terminal expansion as referenced on page 13 of Appendix C? What are the auto and passenger ferry facility and service assumptions for each alternative?

L-007-014 |

- Detailed analysis of pedestrian movements and additional potential pedestrian demands is lacking though general impacts to existing conditions are discussed by alternative in Appendix C.

Development of a Preferred Alternative

L-007-015 | It is not entirely clear from the DEIS how the preferred alternative will be developed. The analysis of "measures of effectiveness" relates entirely to the transportation objectives and the transportation technical reporting. Are these to be used in a formal way in the development of a preferred alternative, and if yes, in what manner? Will the leadership team have a formal role in developing the preferred alternative? Some general description of the process from this point forward would be helpful for the interested reader.

L-007-016 | **Part Two: Steps to be taken to advance the Alaskan Way Viaduct and Seawall Replacement project from a Candidate project to an Approved project in Destination 2030.**

- Background. In May 2001, the Puget Sound Regional Council adopted a new regional transportation plan – Destination 2030. This plan included guidance for capacity investments that categorized all regionally significant improvements as either Candidate or Approved (please refer to Guidance for Major Capacity Investments for a more detailed explanation of these distinctions). The Alaskan Way Viaduct and Seawall Replacement project is included in Destination 2030 as a candidate project. Candidate projects must satisfactorily address Approved project criteria before being designated as Approved in Destination 2030.
- Process. Destination 2030 includes a policy that enables the Regional Council's Executive Board to authorize a change in status of regionally significant projects from Candidate to Approved. Listed below is a summary of the requirements

Appendix C, Transportation Discipline Report, for updated transportation analysis.

L-007-011

A more detailed description of the methodology used for the preparation of traffic forecasts and traffic operations analysis can be found in Chapter 2, Methodology, of the Final EIS Appendix C, Transportation Discipline Report.

L-007-012

The range of measures of effectiveness are intended to provide a broad and comprehensive picture of transportation conditions for each of the alternatives studied. These measures covered both daily and peak period conditions, as appropriate. While they inform the selection of a preferred alternative, no formal scoring or weighting system was employed to combine the results of these measures. The decision of the preferred alternative (Bored Tunnel Alternative) was based on numerous criteria, many beyond the transportation measures identified in the Draft EIS. Note that a cost-benefit analysis is not typically part of a NEPA/SEPA environment process.

Subsequent analysis for the Final EIS considered a smaller, more focused set of transportation measures.

L-007-013

The Washington State Ferries' proposal to expand Colman Dock to include four slips for vehicle ferries and two slips for passenger ferries has changed since it was discussed in the 2004 Draft EIS. Subsequent traffic analysis for the Final EIS reflects forecast conditions (under year-2030 demand) given current services, which has two slips for vehicle ferries at Colman Dock. The Transportation Discipline Report,

Ms. Allison Ray
Page 9
5/28/2004

L-007-016

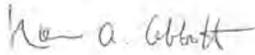
identified in the Guidance for Major Capacity Investments for moving a project from Candidate to Approved status.

1. Regional Council staff review and determine consistency of the project's final preferred alternative with Destination 2030 policies.
2. Sponsor provides documentation for completed benefit cost analysis.
3. Environmental documentation is completed and submitted with sufficient detail as to the final nature, character, components or design of the given project or program to determine regional policy consistency.
4. Sponsor satisfactorily addresses any other planning requirements, which might have been specified by the Regional Council's Executive Board for a given project.
5. Sponsor submits financial plan demonstrating project feasibility by showing how the entire corridor project or its individual project components are to be funded.
6. The project's final preferred alternative is reviewed for consistency with the current plan air quality conformity analysis; a new air quality plan conformity determination may be required.

When a Candidate project meets the above requirements, the project sponsor(s) may request the Regional Council to change the project and associated supporting projects to Approved status.

In conclusion, the Regional Council would like to again thank the study team for their commitment to this project. If you have questions about our comments, please call me at (206) 464-7134 or Kevin Murphy, Program Manager at (206) 464-6411.

Sincerely,



Norman A. Abbott
SEPA Responsible Official

Appendix C, Chapter 5 Operational Effects, Mitigation, and Benefits, explains how transportation, including ferry service, could be affected.

L-007-014

Since publication of the Draft EIS, further efforts have been undertaken to improve the pedestrian assessment for the Final EIS. Additional detail on pedestrian effects is provided in Chapter 5 of the Final EIS Appendix C, Transportation Discipline Report. Chapter 6 of the Final EIS details effects during construction.

One example of these additional efforts is the updated pedestrian volumes that were collected by video along the Alaskan Way surface street in downtown Seattle in August 2006. The purpose of these counts was to quantify pedestrian activity in the summer season along the waterfront for use by the project team in assessing transportation conditions, developing mitigation programs, completing the Final EIS, and furthering project design. Data collected for this effort confirms that pedestrian activity on the waterfront promenade is substantially higher in the summer, particularly during summer weekends.

L-007-015

Please see Chapter 2 in the Final EIS for a description of how project alternatives were identified and developed.

L-007-016

Thank you for describing this process. The lead agencies have been coordinating with PSRC as appropriate.



Working Together For Clean Air

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May 27, 2004

Allison Ray
AWV Project Officer
Wells Fargo Building
999 Third Avenue, Suite 2424
Seattle, WA 98104

RECEIVED
JUN 01 2004
AWWSP Team Office

Re: Draft Environmental Impact Statement (EIS) for Alaskan Way Viaduct and Seawall Replacement Project

Dear Ms. Ray:

The Puget Sound Clean Air Agency appreciates this opportunity to comment on the Draft EIS for the Alaskan Way Viaduct and Seawall Replacement Project. The agency concurs that replacing the seismically vulnerable viaduct and seawall is necessary to safeguard the mobility of people and goods along the SR 99 Corridor and to maintain the vitality of the waterfront district, the city and the Puget Sound region. However, the Draft EIS does not contain an adequate analysis projection of the air quality impacts from criteria pollutants or hazardous air pollutants (HAPs) during the demolition or construction phase of the project nor is there an adequate evaluation of the available mitigation measures or a firm commitment to employ them in a highly populated area. In addition, there is insufficient information upon which to make a conformity determination. The agency believes there are designs and available remedies that will allow the construction and operation to proceed in a manner that will significantly reduce both criteria and HAP emissions, decrease smoke and odor impacts and moderate health risks.

The agency acknowledges the complexity of planning and managing a construction project during a 7.5 to 11 year period in a sensitive urban environment. Abutting the construction zone are many public and private entities with varying interests. The area is a Northwest transportation hub served by the Port of Seattle, Burlington Northern Railroad, two Cruise Line terminals, and the Coleman ferry Dock. In addition, it is home to local residents and there are numerous public activity centers surrounding the project such as the waterfront retail stores, Safeco Field, Seahawk Stadium, Seattle Aquarium, and the Pike Place Market which attracts multitudes of people to the area and potentially exposes them to harmful emissions during demolition and construction operations.

The agency commends the Washington State Department of Transportation (WSDOT) for addressing the air quality impacts from mobile sources for all

L-008-001

The project is located in a Carbon Monoxide (CO) maintenance area. The Final EIS evaluated the reasonable worst case CO operational effects during construction for the preferred Bored Tunnel Alternative. The Bored Tunnel Alternative would meet the standards for criteria pollutants. No additional analysis of criteria pollutants or hazardous air pollutants (HAPs) is needed for the short term effects of demolition of the existing viaduct and construction phase of the project. Puget Sound Clean Air Agency (PSCAA) would regulate particulate emissions (in the form of fugitive dust) during construction activities. A Memorandum of Agreement (MOA) has been developed between WSDOT and PSCAA to help eliminate, confine, or reduce construction period emissions for many larger and longer term projects in Washington State. This MOA would apply to the Alaskan Way Viaduct Replacement Project. Mitigation measures are described in detail in the Final EIS Appendix M, Air Discipline Report.

A conformity determination has been performed for the Tolloed and Non-Tolloed Bored Tunnel Alternative. Based on the results presented in Appendix M, as well as the results of a WASIST analysis conducted for the year of opening (2015) and PSRC's long-range transportation plan analysis year (2040), the project would not cause or exacerbate an exceedance of the NAAQS for CO. The Bored Tunnel Alternative would meet the project-level conformity requirements in accordance with 40 CFR 93.123. In addition, the project is included in the Metropolitan Transportation Plan and the Statewide Transportation Improvement Program, demonstrating that it conforms with the Puget Sound region's Air Quality Maintenance Plan.

- EXECUTIVE DIRECTOR
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- EVERETT
Dey Stephens, Mayor
- MEMBER AT LARGE
Loren Chastain

L-008-001

six construction alternatives as well as its commitment to implement fugitive dust and other mitigation measures. It is hard to understand why this same level of detail was not used to estimate the environmental impacts of criteria pollutants and HAPs during the demolition and construction phases of the project.

The agency recognizes the preliminary nature of the project design at this stage in the EIS process, but without a full evaluation of the air quality impacts from demolition and construction operations it is difficult for commenters and decision-makers to provide specific input to protect the public health, influence selection of the best alternative, and ensure compliance with state and federal Clean Air Acts. The agency has two general comments regarding the adequacy of the Draft EIS for compliance with environmental regulations and conformity regulations and a series of recommendations for the forthcoming "construction air pollution emission plan" within that context.

The agency reiterates its earlier stated position that compliance with state and federal conformity regulations does not constitute compliance with state and federal environmental regulations. In particular, demolition and construction period, diesel exhaust impacts, and mitigation must be addressed in greater detail in the EIS. Second, as stated in Appendix Q Air Quality Discipline Report, the Conformity determination will occur after selection of the Preferred Alternative, its inclusion in the Puget Sound Regional Council's Metropolitan Transportation Plan and Transportation Improvement Program and specific project level conformity analysis. That process should ensure compliance with state and federal conformity regulations. As noted, the Draft EIS does not provide sufficient information upon which to determine compliance with state and federal environmental and conformity regulations in particular because the year of peak emissions of both criteria and hazardous air pollutants have not been identified and construction period emissions and mitigation have not been adequately addressed. This is particularly important because construction activity emissions must be included in the conformity determination.

L-008-002

It is also important that the EIS adequately address construction period emissions and mitigation because the construction period could pose significant risks to air quality and public health. Prior to providing the agency's project and construction activity mitigation recommendations, a brief discussion of the probable health and environmental impacts associated with operating diesel powered engines is important.

Diesel exhaust is a complex mixture of thousands of chemicals.¹ Over 40 of these are listed as by the U.S. Environmental Protection Agency (EPA) as hazardous air pollutants, known human carcinogens, probable human carcinogens, reproductive toxics or endocrine disrupters. In addition, USEPA, CalEPA, and the International Agency for Research on Cancer have all reviewed the health studies pertaining to DPM, and rated the complex mixture as a probable human carcinogen.^{2, 3, 4} In other words, DPM as a whole is likely to cause cancer in humans. No single chemical or suite of chemicals has been identified as the cancer-causing agent in diesel particulate matter.

¹ CalEPA/OEHHA. *For the Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant. Part B: Health Risk Assessment for Diesel Exhaust.* May 1998.

² CalEPA/OEHHA, 1998.

³ International Agency for Research on Cancer (IARC). *IARC Monograph on the Evaluation of Carcinogenic Risks to Humans. Vol. 46: Diesel and Gasoline Engine Exhausts.* 1989.

⁴ EPA. *Health Assessment Document for Diesel Engine Exhaust.* Office of Research and Development. EPA/600/8-90/057F.

L-008-002

The Final EIS and Appendix M, Air Discipline Report, address construction period emissions and presents proposed mitigation measures. This analysis has been updated since the publication of the Draft EIS in 2004.

L-008-002

Diesel exhaust particles carry many of the organics and metals present in the exhaust. Over 90 percent of the mass of these particles are less than 2.5 microns in diameter, commonly referred to as PM_{2.5}. Because of their small size, these particles are easily inhaled into the bronchial and alveolar regions of the lung. In 1998, the State of California declared diesel particulate emissions from diesel fueled engines a toxic air contaminant and has launched a state wide diesel risk reduction program to clean up emissions from public and private fleets operating in California.

L-008-003

As you may be aware, the U.S. Environmental Protection Agency's (EPA) National-scale Air Toxic Assessment study estimated diesel particulate matter (DPM) concentrations in King County.⁵ Our agency conducted a screening analysis on these DPM concentrations and over 30 other air toxics.⁶ We found that DPM poses the greatest potential cancer risk among the 30 air toxics. We also confirmed EPA's DPM predicted concentrations in a separate study with the University of Washington using local monitoring data.⁷ We calculate the potential lung cancer risk from ambient DPM at approximately 500 in a million. This potential health risk is 500 times EPA's "one in a million" acceptable risk level for Superfund sites. Because the existing ambient concentration of DPM already presents a significant health risk, any increases in DPM concentrations should be mitigated as much as possible.

In response to EPA national findings and numerous health studies indicating that diesel emissions are a significant public health risk, EPA has taken definitive action to reduce the emissions by on-road and non-road diesel engines by requiring more stringent emission standards for new engines and requiring the use of Ultra-low Sulfur Diesel (ULSD) fuels beginning in mid 2006 for on-road vehicles. The longevity of the older highly polluting diesel engines has prompted voluntary emission reduction initiatives involving transit and school bus fleets, garbage trucks and public diesel fleets and diesel construction equipment across the U.S. and throughout the world. The prolonged construction period and close proximity to dense population areas make diesel emission mitigation necessary for this project. In addition to the health benefits, a diesel emission reduction program could substantially reduce visible smoke and diesel odor making the project more acceptable to residents, tourists, workers and local business owners.

The Puget Sound Clean Air Agency recommends that WSDOT use the diesel engine retrofit/clean fuels programs undertaken during the Central Artery/Tunnel (CA/T) Project in Boston, Massachusetts, and the I-95 construction project in Southern Connecticut as a basis to design its construction air pollution emission control plan. In the CA/T project, approximately 200 pieces of non-road equipment were retrofitted with diesel oxidation catalysts. In the I-95 project it was projected that if all the equipment with engine size over 60 HP were retrofitted, more than 98% of the emission benefits of retrofitting all equipment would be achieved.

At this point in time the agency recommends the following mitigation elements be included in the construction air pollution emission control plan:

- All diesel construction equipment should be fueled with ULSD fuel or a ULSD/biodiesel blend, and;

⁵ USEPA, *National-scale Air Toxics Assessment for 1996*. Office of Air Quality Planning and Standards. EPA-453/R-01-003. January 2001.

⁶ Puget Sound Clean Air Agency. *Puget Sound Air Toxics Evaluation*. Keill and Maykut, 2003.

⁷ Maykut N, J Lewtas, E Kim and T Larson. *Source apportionment of PM2.5 at an urban IMPROVE site in Seattle, WA*. Environmental Science and Technology. September 2003.

L-008-003

Your concerns about diesel particulate matter (DPM) are noted. The lead agencies are proposing mitigation to address this concern. For instance, appropriate emissions-control devices, such as diesel particulate filters, on large diesel-fueled equipment and the use of low or ultra-low sulfur fuels are both measures that could be required during construction.

Mitigation measures are described in detail in the Final EIS Appendix M, Air Discipline Report and a Memorandum of Agreement with the PSCAA has been developed and will be implemented for this project. The Record of Decision for this project will discuss the mitigation to which the lead agencies are committed.

L-008-003

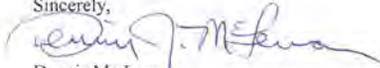
- All diesel equipment with a horse power rating of 60 hp and above that will remain on site or travel to and from the site for more than 30 days total during the entire construction period should be retrofitted with a diesel oxidation catalyst or more efficient pollution control device that is currently verified either by the EPA Voluntary Diesel Retrofit Program or the California Air Resources Board (CARB) verification process. Oxidation catalysts are sulfur tolerant and machinery equipped with them can be used off the project site and fueled with higher sulfur fuels elsewhere without damaging the catalysts, and;
- All diesel construction equipment not in active use and dump trucks that are idling while waiting to load or unload material for three minutes or more, should be turned off, and;
- Staging zones for trucks that are waiting to load or unload material at the work zone should be established in locations where diesel emissions will have the least impact on the public, and
- Construction equipment should be located away from pathways to sensitive receptors such as fresh air intakes to buildings, air conditioners, and operable windows, and;
- A compliance verification process should be developed and implemented to self-police each element of the plan.

Mitigation measures for other impacts discussed in the EIS also have air quality benefits and the agency looks forward to discussing their inclusion in the air pollution plan. The agency also anticipates recommending additional mitigation measures after additional information on construction period activities and equipment is provided.

In closing, the agency acknowledges that the conformity determination can be deferred until a preferred alternative has been selected and looks forward to reviewing it again at that time. Furthermore, the agency believes that the demolition and construction phases of the project must be conducted in a manner that limits public health risks and minimizes quality of life impacts for residents, visitors and waterfront business owners. The agency is prepared to assist WSDOT with the development of a construction air pollution emission control plan to this end.

If you have any questions concerning my comments please contact me or Tom Hudson of my staff at 206.689.4025 or email tomh@pscleanair.org

Sincerely,



Dennis Mc Lerran
Executive Director

jwc

cc: Stu Clark, Ecology
Wayne Grotheer, Port of Seattle
Marina Cofer-Wildsmith, ALAW
Steve Nicholas, Seattle Office of Sustainability and Environment.



June 1, 2004

Mr. Douglas B. MacDonald
Secretary of Transportation
Washington State Department of Transportation
c/o Allison Ray
WSDOT Environmental Coordinator
AWV Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

Re: Seattle Monorail Project comments on the SR 99 Alaskan Way Viaduct & Scawall Replacement Project Draft Environmental Impact Statement

Dear Mr. MacDonald:

The Seattle Monorail Project (SMP) appreciates the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the Alaskan Way Viaduct (AWV) and Scawall Replacement Project prepared by the Washington State Department of Transportation (WSDOT), Federal Highway Administration (FHWA), and the City of Seattle. The viaduct project is important to the city and the region, and the SMP looks forward to coordinating with you on the Monorail Green Line, as it moves toward construction later this year.

SMP is currently completing final route selection and obtaining key permits and approvals for the Green Line. The AWV DEIS discusses impacts to the Green Line in a number of chapters. SMP will continue to work with WSDOT and the City of Seattle to ensure the construction of both projects is coordinated to minimally impact the downtown area, including:

- SMP supports the DEIS proposal for pedestrian crossings over Alaskan Way during construction of the AWV to provide continued access for walk-on ferry passengers. The FEIS should provide additional detail about where pedestrian crossings could be located and the positive impacts of providing convenient access to the Green Line on 2nd Avenue during construction.
- While the DEIS addresses construction impacts to transit services for routes utilizing the West Seattle Bridge and the south SR 99 corridor, the FEIS should also discuss the impacts of rerouting traffic to 1st Avenue, 2nd Avenue, 3rd Avenue and 4th Avenue in the downtown. What impacts will there be on bus routes using those streets and how could those impacts be mitigated?
- AWV preconstruction work, e.g. contractor staging, utility relocation, etc., is currently scheduled for mid-2006 to 2008. The construction of the Green Line is

L-009-001

The lead agencies appreciated receiving these comments. The Transportation Discipline Report, Appendix C, Chapter 5 Operational Effects, Mitigation, and Benefits explains construction effects including how transit service could be affected. 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. 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.

L-009-001

Mr. Douglas B. MacDonald
Page 2
June 1, 2004

L-009-001

contemplated to occur from 2005-2009. SMP agrees with the AWV DEIS Cumulative Impacts Chapter that states these activities should be coordinated with SMP to avoid or reduce impacts, and we look forward to working with your team.

- The FEIS should discuss the AWV Central Area utility relocations and the importance of coordinating with SMP to avoid impacts to downtown Green Line construction, and utility customers.
- The DEIS discusses the impacts of construction staging areas. SMP will likely be completing downtown Green Line construction in 2008 when AWV construction is expected to begin. The FEIS should discuss the benefits and impacts to the downtown of coordinating with the SMP to utilize, where feasible, former Green Line construction staging areas located in the vicinity of the AWV Project.
- The FEIS should discuss any impact on the Seattle Green Line column placements at S. Horton as a result of BNSF track realignments in the Seattle International Gateway yard and Whatcom tail track required by the AWV project.

The Seattle Monorail Project supports the proposed Flexible Transportation Package described in Chapter 10 of the DEIS. SMP looks forward to working with the AWV project to develop transit options for citizens traveling to and through downtown, the West Seattle and the Interbay/Ballard areas which are important feeders for the AWV corridor. The Green Line is projected to be operational in 2009, and because it is an elevated structure, riders will have the option of a completely congestion-free commute during the time the AWV has only one lane open for vehicles. We look forward to coordinating with all the agencies providing transit options within the city, including working on the interagency team.

We appreciate the opportunity to comment on the Draft Environmental Impact Statement and look forward to working closely with you as you complete the Final Environmental Impact Statement. If you have any questions, please contact Denna Cline at (206)587-1737.

Sincerely,



Joel Horn
Executive Director

JH:dc

AWV Draft EIS Comment Form Results:

Name: Catherine Stanford, Director of Real Estate, Pike Place Market, PDA
Address: 85 Pike Street Room 500
City: Seattle
State: WA
Zip Code: 98101
Email: stanford@pikeplacemarket.org
Affiliation (optional): Pike Place Market PDA

Would like to be added to the project mailing list?

Yes

Project Comments:

L-010-001

We believe that the Pike Place Market is situated in a key geographical location, providing a critical link between the Central Business District and the Waterfront. Currently we are one of the few locations along the corridor where the public can find assisted access to and from the Waterfront. We were disappointed that the tunnel option includes replacement of an arial structure from Pine to Battery to access the existing tunnel at Battery. We ask for further exploration of lidding the structure from Pine (at the Southwest corner of the PC-1 site) to at least past the northwest corner of Victor Steinbruek Park. Thank you for the opportunity to comment.

Comments apply to:

L-010-001

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel Alternative and evaluated in the 2006 Supplemental Draft EIS. It was included in the project, due in part to numerous 2004 Draft EIS public comments requesting the lead agencies to consider a lid in the Pike Place/Belltown area. The proposed lid would extend north from where SR 99 emerges from the tunnel's north portal near Pine Street to Victor Steinbrueck Park near Virginia Street. The design for this lid structure with the current Cut-and-Cover Alternative is described in this Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.



RECEIVED
JUN 08 2004
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June 8, 2004

HAND DELIVERED

Ms. Allison Ray
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, Washington 98104

Re: Comments on SR 99: Alaskan Way Viaduct and Seawall Replacement Project,
Draft Environmental Impact Statement

Dear Ms. Ray:

L-011-001

The Washington State Major League Baseball Stadium Public Facilities District (PFD) appreciates the opportunity to review and comment on the draft Environmental Impact Statement ("draft EIS") for the SR 99 Project (the "Project"). While the PFD is supportive of the transportation and infrastructure improvements to be provided by the Project, the PFD is concerned that the draft EIS does not adequately analyze alternatives, impacts and mitigation measures for portions of the Project. In particular, the PFD is concerned that reasonable alternatives have not been considered for the overcrossings and connections from the Project to SR 519 at S. Atlantic St. and S. Royal Brougham Way, and to the current Port of Seattle Terminal 46. In addition, the impacts of these connections have not been adequately evaluated, both during the construction phase and during operations. Finally, design alternatives or mitigation measures for reducing the significant impacts that will result from these connections immediately adjacent to the pedestrian rich environment of Safeco Field have not been adequately considered.

L-011-002

The PFD believes that these omissions are serious and need to be corrected in the final EIS if that document is to meet the standards established in the State Environmental Policy Act (SEPA). The PFD is willing to work with the Project proponents on these issues and encourages direct discussion between Project staff, the PFD and the Seattle Mariners on these topics. While there has been substantial public input and opportunity for comment on the central and

L-011-001

Since the publication of the Draft EIS in 2004, a separate project was completed to address the concerns in this comment. The second phase of SR 519 improvements included the Royal Brougham Way Bridge and the I-90/I-5 off-ramp to S. Atlantic Street. These improvements eliminated the remaining safety issues related to surface-level rail crossings on Royal Brougham Way, and provide safe and efficient waterfront and stadium access for drivers and freight haulers.

Numerous measures to reduce the construction impacts on traffic in the project corridor, and specifically in the stadium area, are described in Appendix C, Transportation Discipline Report, construction mitigation section.

L-011-002

Please note that SR 519 was a separate project with independent environmental analysis. The alternatives developed and evaluated for this project have explored a reasonable range of configurations in the south end of the project that meet the project's purpose and accommodate surrounding activities.

L-011-002 waterfront segments of the Project, additional attention needs to be paid to the south segment and its connections to the surrounding community.

Additional information about the PFD's concerns is provided below. The PFD also joins in the detailed comments submitted by the Seattle Mariners on the Project.

L-011-003 • **Reasonable Alternatives to the Overcrossings and Connections from the Project to SR 99 and the Current POS T-46 Must be Evaluated.**

On July 15, 2004, Safeco Field will celebrate its 5th year anniversary of operations. In each full year of operation, the ballpark has attracted more than 3 million fans to attend the 81 home baseball games. In addition, tens of thousands more people attend other events at the ballpark each year. All told, there are more than 100 days of baseball games or other major events at Safeco Field every year, and the number of events is increasing.

Fan attendance at ballgames and other events at the ballpark produce a very high level of pedestrian and vehicle traffic both before and after events. The streets immediately surrounding the ballpark (in particular S. Royal Brougham Way and Atlantic Street S.) are subject to direct police control. These streets are highly congested with traffic and with pedestrians both before and after games and major events at the ballpark.

The SR 99 Project proposes to provide connections between SR 99, I-5 and I-90 by building aerial overcrossings of, or interchanges with, SR 99 that would place traffic at grade right at the two main entrances to Safeco Field: the home plate entrance at First Ave. S. and S. Atlantic Street and the left field entrance at First Ave. S. and S. Royal Brougham Way.

The PFD is concerned that these connections will prove to be unworkable more than 100 days each year due to the pedestrian and traffic congestion related to events at Safeco Field. The PFD believes that reasonable alternatives for providing connections between SR 99, I-5 and I-90 should be evaluated.

In addition to the impacts mentioned above, another reason for evaluating alternatives is the continued evolution of the properties and land uses adjacent to the ballpark. In particular, the Port of Seattle's Terminal 46 is subject to growing uncertainty as to its future use and development. The terminal is currently used by Hanjin as part of its container shipping operations, but there is uncertainty regarding how long that use will continue (the current lease expires in 2010). There are also preliminary proposals circulating for a major change in use from port facilities to residential/commercial development. This is significant, because it changes the underlying premises (e.g., freight mobility) for the connections.

L-011-003

Phase 1 of the SR 519 Intermodal Access Project added a new grade separation at S. Atlantic Street to provide grade-separated access in the eastbound direction between First and Fourth Avenues S., I-90, and I-5. Phase 2 of the SR 519 Intermodal Access Project, completed in spring 2010, added a corresponding westbound connection. Construction has started on the S. Holgate to S. King Street Viaduct Replacement Project. This project is part of the Alaskan Way Viaduct and Seawall Replacement Program. The S. Holgate to S. King Street Viaduct Replacement Project will build a new section of SR 99 that will have three lanes in each direction south of S. Royal Brougham Way and new on- and off-ramps near the stadiums. A new S. Atlantic Street overcrossing will improve connections between the Port of Seattle and major freeways by allowing traffic to bypass passing trains.

The ramps associated with the interchange in the stadium area replace the Railroad Avenue ramps between SR 99 and First Avenue S. today. Therefore, the traffic that will use these ramps is already traveling through the intersections in question on First Avenue S. The reconfigured interchanges in the SR 99 corridor (west of First Avenue S.) should help redistribute traffic somewhat away from First Avenue S. that normally would continue north to the Railroad Avenue S. ramps. Please see the Final EIS Chapter 5 for description of the proposed improvements in the stadium area. Also please see Appendix C, Transportation Discipline report.

It is likely that police traffic enforcement will continue to be needed on game days well beyond completion of the project. Current staging of the baseball games and especially day games generate increased demand in the area with the evening peak hour commute. Transit service and demand management strategies will continue to be needed to help reduce auto traffic in the area, but they would not completely solve the traffic congestion problems.

L-011-003

The PFD is supportive of the need for connections between these major roadways, and it recognizes that it is one of the direct beneficiaries of these connections. But the PFD also believes that it is time for a thorough review of the transportation needs in this area, including reasonable alternatives to the connections proposed in the SR 99 Project draft EIS. There is more than \$1 billion in public investment reflected in Safeco Field and the Seahawks Stadium and Exhibition Center, and the PFD is concerned about diminishing the value of that public investment by running freeway on-ramps immediately adjacent to and between those facilities. An analysis of additional alternatives should be part of the final EIS.

L-011-004

- **The Impacts of the Project on the Area Surrounding Safeco Field have not been Adequately Evaluated.**

The draft EIS discusses at length the construction and operational impacts of the SR 99 Project, at least with respect to the central and north waterfront portions of the project. The draft EIS fails, however, to adequately analyze the impacts resulting from the construction and operation of the south portions of the Project, including the aerial overcrossings that will directly impact Safeco Field. If the south portion of the Project were an independent project, far more detail analysis of impacts and mitigation measures (both during construction and operation) would be provided than is included in the draft EIS.

For example, the draft EIS discloses that overall Project construction could last between 7.5 and 11 years, not including the year-and-a-half for utility relocations at the beginning of the Project. But there is little discussion of how construction impacts during this decade plus period will affect Safeco Field and the surrounding area and how those impacts will be addressed. In particular, while there are detailed drawings and photo simulations of the impacts of some of the temporary construction "fly-over" for the central portion of the project, no visual simulations are provided for the permanent aerial overcrossings adjacent to the ballpark. View protection from the ballpark has been and will continue to be an important issue for the PFD. This is just one example of the kind of impacts on Safeco Field from the Project that should be evaluated in the final EIS.

L-011-005

- **Design Alternatives or Mitigation Measures for Reducing Significant Impacts on and around Safeco Field Must be Evaluated.**

The final EIS should include detailed analysis of design alternatives or mitigation measures that will reduce the impacts of the Project on and around Safeco Field. These might include measures specifically designed to reduce the construction impacts of the Project and other measures to reduce operational impacts. For example, as noted above Safeco Field is a pedestrian rich environment. The final EIS should include design alternatives or mitigation measures to ensure that pedestrians traveling to and from

L-011-004

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

Construction has started on the S. Holgate to S. King Street Viaduct Replacement Project. This project is part of the Alaskan Way Viaduct and Seawall Replacement Program. The S. Holgate to S. King Street Viaduct Replacement Project will build a new section of SR 99 that will have three lanes in each direction south of S. Royal Brougham Way and new on- and off-ramps near the stadiums. A new S. Atlantic Street overcrossing will improve connections between the Port of Seattle and major freeways by allowing traffic to bypass passing trains.

L-011-005

The Final EIS Appendix C, Transportation Discipline Report, describes the proposed pedestrian facilities near the stadiums and discusses event traffic. Chapter 6 contains details regarding effects on pedestrian facilities and event traffic during construction.

Ms. Allison Ray
June 8, 2004
Page 4

L-011-005

Safeco Field or the Seahawks Stadium and Exhibition center can get there safely. How this will be accomplished, given the proposed aerial overcrossings adjacent to Safeco Field, simply is not discussed or demonstrated in the draft EIS. This needs to be corrected in the final.

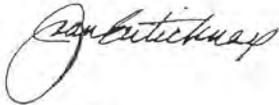
L-011-006

- **The PFD Joins in the Detailed Comments on the draft EIS Made by the Seattle Mariners.**

The Seattle Mariners submitted a detailed comment letter on the draft EIS, raising concerns about the EIS's content but also expressing support for the Project in general. The PFD has reviewed those comments and joins in raising them to the SR 99 Project team for response in the final EIS.

Thank you again for the opportunity to comment. We look forward to working cooperatively with WSDOT and the City of Seattle as they study further the impacts, alternatives and mitigation measures described in this letter. If you would like to arrange a meeting with the PFD, please contact Kevin Callan our Executive Director. Kevin can be reached at (206) 664-3079 or (206) 767-7800.

Sincerely,



Joan Enticknap
PFD Board Chair

cc: PFD Board Members
Kevin Callan, Executive Director
Seattle Mariners
Steve Pierce, City of Seattle

Pedestrian access would be maintained at all times during construction, although at times it may be necessary to reroute pedestrians using temporary facilities/detours designed to minimize user inconvenience. The Transportation Discipline Report contains proposed mitigation measures to reduce construction effects, including in the stadium area. These mitigation measures may be refined as construction plans evolve.

L-011-006

Your agreement with the comments submitted by the Seattle Mariners is acknowledged. The responses to the Seattle Mariners comment letter can be found in item B-008.

September 22, 2006

HAND DELIVERED

Ms. Kate Stenberg
WSDOT Environmental Manager
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, Washington 98104

Re: Comments on SR 99: Alaskan Way Viaduct and Seawall Replacement Project,
Supplemental Draft Environmental Impact Statement

Dear Ms. Stenberg:

The Washington State Major League Baseball Stadium Public Facilities District (PFD) appreciates the opportunity to review and comment on the *supplemental* draft Environmental Impact Statement ("supplemental draft EIS") for the SR 99 Project (the "Project"). The PFD commented previously on the draft EIS, by letter dated June 8, 2004.

L-012-001 While the PFD continues to be supportive of the transportation and infrastructure improvements to be provided by the Project, the PFD is concerned that the supplemental draft EIS still does not adequately analyze alternatives, impacts and mitigation measures for the southern portion of the Project. While the supplemental draft EIS narrows the range of alternatives evaluated and incorporates numerous design changes and new construction plans, the PFD believes that additional analysis is required for the alternatives, impacts and mitigation measures relating to the south portion of the project.

L-012-002 In particular, the PFD is concerned that the overcrossings and connections from the SR 99 Project to SR 519 at S. Atlantic Street and S. Royal Brougham Way have not been fully studied. To the extent that these intersections have been studied, much of the analysis appears to be based on designs that have since been modified. For example, Appendix W to the supplemental draft EIS contains detailed drawings of the Alternatives and Options, and it includes drawings for the Atlantic Street and Royal Brougham intersections. However, those

L-012-001

This Final EIS includes additional analysis of refined designs for the southern end of the project and more detailed discussion on construction impacts and mitigation measures.

L-012-002

Construction has started on the S. Holgate to S. King Street Viaduct Replacement Project. This project is part of the Alaskan Way Viaduct and Seawall Replacement Program. The S. Holgate to S. King Street Viaduct Replacement Project will build a new section of SR 99 that will have three lanes in each direction south of S. Royal Brougham Way and new on- and off-ramps near the stadiums. A new S. Atlantic Street overcrossing will improve connections between the Port of Seattle and major freeways by allowing traffic to bypass passing trains. As requested by this comment several face-to-face meetings were held with the PFD and Seattle Mariners as project designs and construction plans proceeded. Information provided during these meetings was helpful and incorporated into the project to the extent practical.

L-012-002 drawings show an aerial interchange at Atlantic Street, rather than the at-grade Atlantic Street that we understand has replaced it. Similarly there have been major changes to the Royal Brougham interchange that are not appropriately reflected in the Appendix W design drawings. To the extent that these outdated drawings were used for the analysis of impacts and potential mitigation measures, both the drawings and the analysis will need to be updated in the final EIS.

We understand that complicated roadway projects like this one are often in an almost constant state of revision, especially when they are part of a larger roadway network that is itself changing (e.g., the SR 519 connection). But we are concerned that the impacts of construction and potential mitigation measures be evaluated in more detail. We appreciate the additional information and detail on the three construction plans evaluated in the supplemental EIS, but for a project of this complexity development of the mitigation plan should include one-on-one meetings with key affected stakeholders. Those stakeholders, at a minimum, should include the PFD and our tenant, the Seattle Mariners.

L-012-003 We appreciate that you have identified the need to provide further public and agency review of mitigation elements (*see, e.g.*, Chapter 7, Question 23), and we look forward to participating in that process. We have been working effectively with WSDOT and the City of Seattle on such issues as they relate to the SR 519 project, and we look forward to working with the same parties on the SR 99 project.

L-012-004 As a spectator sports facility and pedestrian venue, the continued success of Safeco Field turns in large part on our baseball fans and patron's ability to access our facility. We understand that facility access will be affected during much of Project construction, but we would like to continue to work with you regarding the details of mitigation planning. Areas of particular concern for the PFD that we trust will be addressed in the final EIS include all of the following:

- Pedestrian access and pedestrian safety
- Automobile ingress and egress
- Transit access and impacts of closures
- Detour route information
- Parking (on-street and off); parking loss and parking mitigation
- Height/View impacts from the Atlantic Street and Royal Brougham interchanges
- Noise impacts on Safeco Field
- Light, glare, vibration and dust impacts (during construction and operation)

L-012-003

Thank you. Your organization's input has been a valuable part of the project development process.

L-012-004

As you are aware, the project and proposed build alternatives have changed substantially since these comments were submitted in 2006. Please see the Final EIS for updated information on the proposed alternative, their effects, and proposed mitigation.

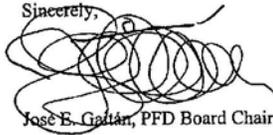
Ms. Kate Stenberg
September 22, 2006
Page 3

L-012-004

- Mitigation commitments, during Project construction and thereafter

Thank you again for the opportunity to comment. We look forward to working cooperatively with WSDOT and the City of Seattle as you study further the impacts, alternatives and mitigation measures described in this letter. If you would like to arrange a meeting with the PFD, please contact Kevin Callan our Executive Director. Kevin can be reached at (206) 664-3076 or (206) 767-7800.

Sincerely,

A handwritten signature in black ink, appearing to read "Jose E. Gattán", written over a circular scribble.

Jose E. Gattán, PFD Board Chair

cc: PFD Board Members
Kevin Callan, Executive Director
Clyde MacIver, Seattle Mariners



RECEIVED
SEP 26 2006

September 22, 2006

Kate Stenberg
Alaskan Way Viaduct Environmental Manager
999 Third Avenue, Suite 2424
Seattle, WA 98104-4109

Dear Ms. Stenberg:

Thank you for the opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Alaskan Way Viaduct (AWV). This letter details comments from King County Department of Transportation (DOT). Some of the concerns are highlighted below; more detail is provided in the full comments found in the attachments to this letter (Attachment 1).

L-013-001 First, we would like to state that all of our comments on the Draft Environmental Impact Statement (DEIS) are still applicable (Attachment 2). In the DEIS letter dated June 1, 2004, DOT noted concern about construction and operational impacts to transit access and operations, Paratransit service, pedestrian access and freight mobility.

Thank you once again for producing a high quality document with helpful and understandable graphics. We applaud your effort to make environmental documents readable, which has made our review more effective.

Transportation

L-013-002 Easy access to downtown Seattle from the south, central and the north end is important to maintain and attract downtown commuters to continue to use transit. Therefore, transit mobility and reliability for downtown transit service need to be considered during and after the construction period.

We will continue to work with the project team to determine how transit will move safely through anticipated bottlenecks, and to identify changes to bus stops and other facility improvements. Facilities and treatments required to accommodate transit operations and minimize transit delay on access routes to downtown should be developed for the preferred alternative and included in the Final Environmental Impact Statement (FEIS).

L-013-003 Coordinated Construction Mitigation Plan
There are several regional transportation projects that are expected to occur during the seven to ten year reconstruction period for the AWV. It is critical that these mitigation plans are coordinated and sequenced in order to deliver efficient and effective services to the



L-013-001

Please see L-005 for response to your June 1, 2004 Draft EIS comment letter. Thank you for your careful review of the Draft and Supplemental Draft EISs.

L-013-002

The Final EIS has been prepared in close coordination with King County, and we greatly appreciate your assistance.

The Washington Department of Transportation, the City of Seattle, and King County Metro have developed a mitigation program to address construction impacts. This program includes expanded public transit service along the affected corridor. The project includes new facilities that would enhance speed and reliability of transit services in the project corridor. These enhancements include a northbound shoulder bus lane on SR 99 between Holgate Street and north of Dearborn Street in the SODO area. Also, a bus-only lane would be provided in the north area of the project corridor in the vicinity of Aurora Avenue and Denny Way.

L-013-003

One of the main benefits of the Bored Tunnel Alternative is the ability to maintain operations on SR 99 throughout the construction period. Current construction plans call for a relatively short (several-week) closure during the end of construction to connect the tunnel with the remainder of SR 99. A detailed discussion of the construction effects on transportation facilities and services is provided in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report. This discussion includes an assessment of the effects of concurrent construction projects on transportation facilities and services. Also included in Chapter 6 is a listing of the planned construction mitigation activities.

L-013-003 | community. We suggest that the FEIS include a description of how the cumulative construction impacts of multiple concurrent projects will be monitored, and how a mitigation program will be managed dynamically to address them.

Because of changes in access to downtown Seattle, transit priority measures such as shoulder transit lanes should be considered on First Avenue South, the Denny Way ramp area, and the Pike/Pine and Madison/Marion corridors, especially during construction. In addition, King County believes it is necessary complete the Spokane Street Viaduct and the Lander grade separation projects prior to construction start of the AWV.

L-013-004 | Adequate Funding for Construction Mitigation

During reconstruction of the AWV, the impacts to transit will be significant. Metro transit is working with the AWV team to develop a comprehensive set of transit mitigation measures that are required to support the transit service during the reconstruction. We strongly support the 31 strategies included in the document, and appreciate the collaborative approach that the AWV team is taking to develop these concepts further. However, we want to emphasize that the size and cost of the mitigation program should not be limited by any placeholder budget assigned to these items in the SDEIS. Costs should reflect the transit priority measures needed, the additional service needed to provide mobility, and the unmitigable cost to transit of longer trip time, both through the Central Business District (CBD) and approaching the CBD on I-5, Aurora Avenue North, 15th Avenue West, Spokane Street South, and other corridors that will be affected by construction traffic diversion and delay. When these costs are better understood and disclosed in the FEIS, the size and cost of the mitigation program should be revisited prior to the Record of Decision to reflect the true costs of mitigation.

L-013-005 | Analysis of Construction Impacts to Transit

The size and extent of the transit mitigation program should be based on an analysis of the travel time and reliability impacts along key transit corridors, rather than on an analysis of specific intersections alone. Transit agencies have made an effort to propose routings for the construction period that would concentrate transit service along a minimum set of street segments where priority treatments would be applied. The construction management plan included in the FEIS should be based on an analysis of the total delay expected for transit along each of these corridors from end to end by time of day and at each major stage of construction.

L-013-006 | Mitigation Beyond Transit

During construction of the AWV, all the traffic that currently uses the AWV will be dispersed to roadways throughout the region. Mitigation for this project must be expanded to include intelligent transportation systems (ITS) projects throughout the region to help keep transit and vehicles moving.

L-013-007 | Shorter Construction Preferred

Due to the high inflation rates for construction and the disturbance to Seattle streets, King County prefers the shorter construction period.

L-013-004

As part of the Bored Tunnel project and related projects, WSDOT and partner agencies have or will implement several strategies to keep traffic moving during construction. 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. The agreement signed by the Governor, County Executive, and Mayor in January 2009 described a program of independent yet complementary projects for replacing the Alaskan Way Viaduct and providing a strategy for overall mobility in Seattle. The State is responsible for replacing the viaduct, the City for the seawall and central waterfront, and the County accepted responsibility for additional RapidRide and express bus service, with some identified as construction mitigation. These future transit service improvements have benefits independent of replacing the Alaskan Way Viaduct. WSDOT recognizes the funding anticipated in the agreement has not been realized, and that the recent economic downturn has reduced other funding sources King County currently relies on for providing transit service throughout King County.

Currently, WSDOT is providing funding for King County on the S. Holgate Street to S. King Street Viaduct Replacement Project to provide additional transit service hours to help mitigate the effects of construction. This program is ongoing and regularly monitored to evaluate its effectiveness. For the Alaskan Way Viaduct Replacement Project, WSDOT will continue to evaluate the need for increased bus service in the West Seattle, Ballard, Uptown, and Aurora Avenue corridors during the initial portions of the construction period, as well as a bus travel time monitoring system.

WSDOT will prepare a traffic management plan, which will contain

South Park Bridge

L-013-008

The South Park Bridge carries 14th and 16th Avenues South over the Duwamish River in the South Park neighborhood and is scheduled to be replaced in 2010-2012. This bridge carries 20,000 vehicles per day and is an important regional link connecting southwest King County to the manufacturing/industrial centers of the Duwamish area and various arterials leading to downtown Seattle. If the replacement bridge construction project is not fully funded by 2010, King County will close the bridge due to safety concerns. This closure will severely impact traffic on First Avenue South Bridge, doubling delays at intersections immediately north of the bridge, which will reduce traffic flow at these intersections to Level of Service F during both commutes. In addition, the completion of the SR 509 link between SeaTac and I-5 will add 20,000 vehicles per day to the First Avenue South Bridge and the South Park Bridge will be a critical facility in mitigating these heavy volumes.

In the event that funding for the South Park Bridge is not obtained, the South Park Bridge will be closed at some point during the construction of the AWV project. The AWV project will need to plan for and mitigate the additional traffic on the First Avenue South Bridge when the South Park Bridge is closed. Should funding be secured to replace the South Park Bridge and the project is constructed concurrently with the AWV project, then only minor closures of the South Park Bridge would occur with minimal impact to the AWV project.

King County looks forward to working collaboratively with the AWV team to develop the construction mitigation plan and to add detail to the preferred alternative in the FEIS.

Sincerely,



Harold S. Taniguchi, Director
King County Department of Transportation

Attachment 1: Specific comments from DOT on the Supplemental Draft
Environmental Impact Statement

Attachment 2: June 1, 2004 letter outlining King County's comments on the Draft
Environmental Impact Statement

localized traffic mitigation measures. These measures will be developed as construction details are refined. Please see the Final EIS, Appendix C, Chapter 6 of the Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

L-013-005

The Final EIS provides travel time tables that show the anticipated effect of construction activities on transit. The travel times presented in the Final EIS are for the stage of construction that is expected to have the most extensive travel delays. The results indicated relatively small changes in travel times between the baseline and construction scenarios.

L-013-006

As part of the Bored Tunnel project and related projects, WSDOT and partner agencies have or will implement several strategies to keep traffic moving during construction. 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.

The agreement signed by the Governor, County Executive, and Mayor in January 2009 described a program of independent yet complementary projects for replacing the Alaskan Way Viaduct and providing a strategy for overall mobility in Seattle. The State is responsible for replacing the viaduct, the City for the seawall and central waterfront, and the County accepted responsibility for additional RapidRide and express bus service, with some identified as construction mitigation. These future transit service improvements have benefits independent of replacing the Alaskan Way Viaduct. WSDOT recognizes the funding anticipated in the agreement has not been realized, and that the recent economic

Attachment 1: Specific Comments from King County Departments

Department of Transportation:

- L-013-009** Transit Access to Downtown Seattle from the South
Since the Seneca Street and Columbia Street ramps will be eliminated, the most likely transit routing from SR 99 to downtown Seattle from the south will be to use the ramps in the vicinity of King Street and to access the downtown street system using S. Main or S. Washington Street. Since the DEIS was published and based on the recent discussion with AWV project staff, our understanding is that the King Street ramp will be the sole access point to/from SR 99 from the Seattle CBD. The ramp is also used as access and egress to the stadium vicinity and may likely be congested during the special events. The FEIS should assess the likely delay to transit making the movements between SR 99 and the downtown street system, and include transit priority treatments necessary to ensure that transit will have a reliably clear path to enter and leave the CBD. Transit priority measures such as shoulder transit lanes should be considered to ensure transit would operate reliably through anticipated bottlenecks and long signal cycles near ramps. The movement between Alaskan Way and Main or Washington St. should be limited to transit vehicles to avoid attracting general-purpose traffic to these routes.
- L-013-010** The intersections at 1st Avenue/Atlantic Avenue and 1st Avenue/Royal Brougham are expected to be more congested than today. For transit service to function effectively on 1st Avenue through the area, transit priority treatment(s) are needed to maintain transit speed and reliability.
- L-013-011** To provide mobility from south Seattle to downtown for both vehicles and freight, two projects need to be completed before the construction of the AWV- the final phase of the Spokane Street project (Phase IV) and the Lander Street grade separation. Lander St. is needed to provide a fast and reliable route between the Spokane St. viaduct and the E-3 busway. If the Lander St. grade separation cannot be completed before AWV construction begins, a reliable alternative transit route must be defined to bring West Seattle transit riders into the CBD during the construction period.
- L-013-012** Transit Access to Downtown Seattle from the North
The SDEIS includes changes to transit access into downtown Seattle from Aurora Avenue N. under the "lowered Aurora" options. If these options are selected, it will influence Metro's access routes and requirements to enter the CBD. Metro operates both local and express services in this corridor, having different access requirements.
- Use of the Denny Way ramps is our preferred option for express services, but placement of the on-ramp to enter on the left side of SR 99 will require buses to weave across traffic before making their first northbound stop. To use the Denny Street ramps, both northbound and southbound bus stops must be located in the vicinity of Denny Way. Metro staff is available to help determine safe locations and design for these stops.
- Local service will enter and exit at the Roy St. interchange. If it is found that the weaving movement for buses entering SR 99 northbound at Denny Way is unsafe or unreliable, express buses may need to use this interchange also. The at-grade design of this interchange under the lowered Aurora options will require buses to operate on a couplet using both Dexter and Sixth

downturn has reduced other funding sources King County currently relies on for providing transit service throughout King County. Currently WSDOT is providing funding for King County on the S. Holgate Street to S. King Street Viaduct Replacement Project to provide additional transit service hours to help mitigate the effects of construction. This program is ongoing and regularly monitored to evaluate its effectiveness. For the Alaskan Way Viaduct Replacement Project, WSDOT will continue to evaluate the need for increased bus service in the West Seattle, Ballard, Uptown, and Aurora Avenue corridors during the initial portions of the construction period, as well as a bus travel time monitoring system.

WSDOT will prepare a traffic management plan, which will contain localized traffic mitigation measures. These measures will be developed as construction details are refined. Please see the Final EIS, Appendix C, Chapter 6 of the Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

L-013-007

The lead agencies note and acknowledge King County's preference for the shorter construction period associated with the project's construction plan analyzed in the 2006 Supplemental Draft EIS. Please see the Final EIS for updated construction sequencing.

L-013-008

Specific construction transportation planning measures, including coordination with other projects in the region, will continue to be developed as the project construction timeline evolves. The South Park Bridge is currently closed. However, funding has been obtained to replace the existing bridge. The County plans to go to bid in early 2011 with an anticipated completion in late 2013.

A traveler information system is proposed that would help direct drivers

L-013-012 Avenues N. This will add more transit travel time as stated in the SDEIS. Transit priority treatments will likely be required on these streets to minimize delay. Since passengers will need to access transit on alternative sides of SR 99, they will need to cross the facility in one direction of each round trip. Pedestrian connections across SR 99 and into both the Seattle Center and South Lake Union will be critical to making transit effective in the area.

Specific Comments on SDEIS:

L-013-013 1. *Chapter 5, Question 18*
The parking mitigation strategy in the FEIS should include measures for reducing parking demand, in addition to measures for changing supply. Measures for reducing demand for parking include changing parking fee levels, changing fee structures, prioritizing parking for carpools and vanpools and measures for encouraging the use of other alternative modes. An effort should be made to quantify the impacts of demand-side measures on the level of parking demand. When evaluating the need for additional parking supply, the parking mitigation strategy should assume that demand-management strategies will be in effect.

L-013-014 2. *Chapter 7, Question 3*
It is unclear whether these shifts in behavior were quantified and incorporated in the analysis of traffic impacts. The FEIS should more clearly identify and explain these relationships. The report should also discuss the possibility of maintaining these shifts into the post-construction period.

L-013-015 3. *Chapter 7, Question 3*
The strategies included under the heading "Enhance Traveler Information" should incorporate information about these alternate routes. As an additional measure, the project partners should consider installing signage to inform drivers about the location of alternate routes. When designating alternate routes for automobile traffic, effects on transit service should be explicitly evaluated. Detrimental impacts on transit speed and reliability should be minimized through measures identified in King County Metro's "Transit Blueprint" plan.

L-013-016 4. *Chapter 7, Question 7*
The FEIS and Construction Transportation Management Plan should indicate that strategies (both additional strategies and strategies from the list of 31 included in the DEIS) will be evaluated and prioritized to ensure that funds are devoted to TDM programs that have potential to spur the largest non-SOV mode shift. Common criteria for prioritization include but are not limited to (not in order of importance):

- Practicality to implement
- Number of people or trips impacted
- Efficiency (number of dollars spent per shifted trip)
- Administrative oversight required

The final Construction Transportation Management Plan (CTMP) should include a plan for funding the key strategies. The funding plan should include the total amount of funding available and the amount to be spent on each strategy included in the plan.

to alternate routes during project construction. Additional information about the South Park Bridge could be incorporated into the system.

L-013-009

The Final EIS provides travel time tables that show the anticipated effect of construction activities on transit corridors. The travel times presented in the Final EIS are for the stage of construction that is expected to have the most extensive delays. The results indicated small changes in travel times between the baseline and construction conditions. For transit travel between West Seattle and downtown Seattle, buses will have travel time benefits with the provision of a northbound bus-only shoulder lane on SR 99 that will be available when project construction starts.

L-013-010

The Washington Department of Transportation, the City of Seattle, and King County Metro have developed a mitigation program to address construction impacts. The program elements include ITS development along major streets, including First Avenue S. More localized mitigation measures will be developed as construction details are refined. Also, a construction traffic management plan will be prepared to ensure that construction effects on local streets, property owners, and businesses are minimized.

L-013-011

Construction of the Spokane Street widening is underway and is anticipated to be complete by the time construction starts for the preferred Bored Tunnel Alternative. The Spokane Street Viaduct project will include a Fourth Avenue off-ramp for traffic from West Seattle. The Lander Street project is currently on hold. However, the Alaskan Way Viaduct Replacement Project includes the provision of a northbound bus-only shoulder lane on SR 99 between S. Holgate Street and past S. Royal Brougham Way.

L-013-017 5. *Chapter 7, Question 17*

The final CTMP should include a component geared toward construction worker transportation. Transit, carpools or vanpools may be viable options for many of these construction trips, reducing the need for 2,000 construction worker parking spaces. In addition to the possibility of having construction crews park in remote lots and reach the worksite via shuttle, the FEIS and Construction Transportation Management Plan should include strategies for moving construction-related trips to these alternate modes. Strategies could include:

- Employer-provided secure on-site storage for tools and equipment
- Employer-provided transit passes
- Personalized trip planning for construction workers
- Origin/end van share programs to transport workers from transit hubs to and from the worksite.

L-013-012

WSDOT, the City of Seattle, and King County Metro have developed a mitigation program to address construction effects. This program includes expanded public transit service along the affected corridor. More localized mitigation measures will be developed as construction details are refined. Also, a construction traffic management plan will be prepared to ensure that construction effects on local streets, property owners, and businesses are minimized.

WSDOT will prepare a traffic management plan, which will contain localized traffic mitigation measures. These measures will be developed as construction details are refined. Please see the Final EIS, Appendix C, Chapter 6 of the Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

In the north portal area, improved access to and from SR 99 near the north portal and added network redundancy across SR 99 would result in reduced congestion before and after Seattle Center events. These roadway changes would likely improve circulation and reduce overall congestion levels at critical intersections near the Seattle Center during large events by providing more direct access to regional facilities such as SR 99 and I-5. A detailed traffic analysis has been conducted for all alternatives and is described in this Final EIS. Please refer to Appendix C, Transportation Discipline Report, for additional detailed analysis of impacts to transportation elements, including transit.

L-013-013

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number

of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide frequent parking updates
- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

L-013-014

Impacts to traffic during major construction activities for the each build alternative have been analyzed as part of the Transportation Discipline Report (TDR) for the Final EIS. Traffic management approaches (detours), mitigation measures, and expected performance associated with major construction stages are discussed in the TDR (Appendix C of the Final EIS).

L-013-015

One of the main benefits of the Bored Tunnel Alternative is the ability to maintain operations on SR 99 throughout the construction period. Current construction plans call for a relatively short (several-week) closure during the end of construction to connect the tunnel with the remainder of SR 99. A discussion of the construction effects on transportation facilities and services is provided in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report. Also included in Chapter 6 is a listing of the planned construction mitigation activities. Included in this list are advance traveler information systems to warn vehicles of construction activities and provide information regarding alternative routes.

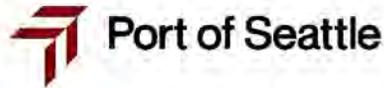
L-013-016

As part of the Bored Tunnel project and related projects, WSDOT and partner agencies have or will implement several strategies to keep traffic moving during construction. 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. WSDOT will prepare a traffic management plan, which will contain localized traffic mitigation measures. These measures will be developed as construction details are refined. Please see the Final EIS, Appendix C, Chapter 6 of the Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

L-013-017

The transportation planning process for construction encourages construction workers to use alternatives to the single-occupant vehicle to access the job site in order to minimize traffic congestion during peak travel periods. The Transportation Discipline Report (Appendix C of the

Final EIS) includes strategies targeted specifically to construction workers. Construction transportation management strategies will continue to evolve as the project construction plans become more definite.



September 22, 2006

Ms. Kate Stenberg
AWV Environmental Project Manager
AWV Project Office
WSDOT
999 Third Avenue, Suite 2424
Seattle, WA 98104-4019

Re: Port of Seattle—Comments on the Viaduct/Seawall SDEIS

Dear Ms. Stenberg:

Thank you for the opportunity to comment on the *Supplemental Draft Environmental Impact Statement for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project*. We very much appreciate the team's effort, and its willingness to provide an opportunity for Port staff to participate in the process. This already allowed us to include many Port concerns in the analysis, even if they are not addressed directly in the document we are commenting on today. We are looking forward to continuing work with the project team to address these and other, as yet unidentified, issues.

L-014-001

Our letter from Port of Seattle Commission Vice President Lloyd Hara to Secretary McDonald and Mayor Nickels (please see attached) 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.

A. Project Long-term

1. Maintaining corridor capacity

L-014-002

a. Selected design alternatives

We fully support the decision to carry forward only the alternatives that retain the existing capacity of the corridor. The region, and the state, cannot afford the congestion and related economic impact of the 40-50% reduction in capacity that a surface alternative would create. SR-99 is not a local street, it comprises a significant percentage of the north-south highway capacity through the City of Seattle. It is in the entire state's interest to maintain that capacity.

L-014-001

The letter to Secretary MacDonald and Mayor Nickels is included at the end of this correspondence.

L-014-002

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Tunnel Alternative in 2006. We also appreciate receiving your comments on the 2010 Supplemental Draft EIS and support of the preferred Bored Tunnel Alternative, which is item L-001 in Appendix S. The lead agencies recognize and acknowledge that the existing capacity of the corridor must be sufficient. Chapter 3, Alternatives Description, of the Final EIS discusses the current configuration of the proposed build alternatives. Chapters 5 (Permanent Effects) and 6 (Construction Effects) describe the right-of way effects for each alternative.

L-014-002

We prefer the stacked tunnel for the tunnel alternative due to its somewhat lesser right-of-way impacts on the waterfront.

L-014-003

b. Capacity and functionality of Alaskan Way surface

Freight mobility

Any design configuration for Alaskan Way surface must ensure that the route is safe and reliable for through-traffic, including over-legal trucks and trucks carrying flammable materials. Alaskan Way surface is, apart from Interstate 5, the only “over-legal” north-south freight route through downtown (transporting by special permit). All flammable materials will be prohibited from a Viaduct replacement facility, be it a tunnel or an aerial structure, at least part of the day. Alaskan Way Surface will then be essential for fueling trucks traveling to Fisherman’s Terminal and other maritime uses in the BINMIC/Ballard area from Harbor Island fueling facilities.

L-014-004

In-traffic streetcar reliability and impact on cruise at P-66

The tunnel design for Alaskan Way surface places the streetcar, together with vehicle traffic, in the center lanes. We urge further analysis of its trip reliability and impact on other traffic, especially freight, and cruise-related trips. Alaskan Way, more so than other streets, is periodically subject to severe congestion due to train crossings (closing Broad, Vine, Clay and Wall Streets); stadium traffic pre- and post-events; and ferry traffic unloading from Colman Dock. With the current design, the streetcar will be subject to the same stop-and-go traffic as other vehicles sharing its lanes, which will impact the headways it can achieve and maintain. To date it does not appear that these congestion impacts have been analyzed in sufficient detail.

We are particularly concerned about the design of Alaskan Way surface north of the aquarium, where congestion occurs today. Rail traffic is forecast to double from 2001 to 2020, blocking traffic twice as long (North Waterfront Access, 2001). Freight train blockages are usually 5-10 minutes per train and will become longer as intermodal trains increase in length. Operational modeling that evaluates the movement of all modes in the corridor, as well as events like ferry (un)loading, is needed.

A comparison analysis of the streetcar modeled (1) as proposed, contrasted with (2) being in dedicated right-of-way all along the waterfront, or (3) consolidating to one track near the aquarium and continuing north with a separate right-of-way, single-track to the northern terminus of the streetcar line, would test this issue.

L-014-003

The City of Seattle, through its Central Waterfront Project, will develop final designs for Alaskan Way. At this time, it is anticipated that there will not be any changes to the roadway classification or use of a future surface Alaskan Way. Over-legal trucks and trucks hauling flammable materials are expected to continue using this route once construction is complete.

L-014-004

Construction of the Olympic Sculpture Park in 2007 led to the indefinite suspension of the George Benson Line Waterfront Streetcar service because it displaced the vehicle storage and maintenance facility. King County Metro currently provides replacement service with fare-free bus service on the Route 99 Waterfront Streetcar Line. The routing and stop locations for this line do not exactly duplicate those of the waterfront streetcar; however, Route 99 serves the same neighborhoods—the waterfront, Pioneer Square, and Chinatown/International District. With the Bored Tunnel Alternative the final location of the streetcar will be determined by the Central Waterfront Project being led by the City of Seattle. Both the Cut-and-Cover Tunnel and the Elevated Structure Alternatives include the streetcar along Alaskan Way.

L-014-004	<p>Ridership levels for the streetcar north of the aquarium may not justify double track operation. Moving to a separate right-of-way, single track at that location could help the streetcar avoid vehicle congestion at at-grade train-crossings and at Pier 66 (P-66) cruise terminal.</p>
L-014-005	<p>In addition, it will be necessary to ensure that large trucks (53' trailer) and buses, which currently need to turn from the outside north-bound lane onto the apron at P-66, will be able to make that movement across/under two streetcar tracks and related overhead wires, should the streetcar remain in the center lanes.</p>
L-014-006	<p>c. Capacity and functionality of rail operations</p> <p>We support the project team's preference for a reconfigured Whatcom rail yard because it has less impact on rail operations. Increasing numbers of both trains and train lengths will make full replacement of the current tail track length critical.</p>
L-014-007	<p>2. Elliott/Western ramps</p> <p>We appreciate that both remaining alternatives now retain the Elliott/Western ramps, unlike in the DEIS. They are essential for moving freight between the city's two manufacturing-industrial centers. They also provide access from the viaduct to a planned cruise terminal at Terminal 91. The SDEIS, however, does not provide information on the grade of the north-bound off-ramp at Western; it should be designed for trucks.</p>
L-014-008	<p>3. Grade separation at Broad Street</p> <p>The SDEIS removed the underpass at Broad Street providing grade separation from the BNSF mainline at Alaskan Way surface. However, the need for a grade-separated arterial connected to Belltown will increase, rather than decrease, over the planning horizon of the project. This affects access to our facilities on the north waterfront.</p>
L-014-009	<p>4. North of Battery Street Tunnel</p> <p>The SDEIS proposes partially lowering Aurora from the Battery Street Tunnel to Republican Street, in conjunction with a design for a widened, two-way Mercer Street. We support the concept of the Partially Lowered Aurora, reconnecting the street grid, combined with two-way Mercer Street. The design and construction sequencing of these new components must provide for a viable truck corridor between Terminal 91 and I-5.</p>
L-014-010	<p>5. Access and impacts to Port properties</p> <p>Many of the Port's facilities, and the tenants using these facilities, will be impacted by the project. It will be critical for the project team to</p>

L-014-005

Construction of the Olympic Sculpture Park in 2007 led to the indefinite suspension of the George Benson Line Waterfront Streetcar service, because it displaced the vehicle storage and maintenance facility. With the Bored Tunnel Alternative (preferred alternative) the final location of the streetcar will be determined by the Central Waterfront Project being led by the City of Seattle.

L-014-006

The configuration Whatcom Railyard and the viaduct replacement in this location was addressed in the S. Holgate Street to S. King Street Environmental Assessment and is no longer part of the Alaskan Way Viaduct Replacement Project.

L-014-007

The project has evolved since 2006. Please refer to the Final EIS for updated information. The preferred Bored Tunnel Alternative would remove the Elliott and Western ramps. The connection between Alaskan Way and Elliott and Western Avenues would be constructed as a separate independent project associated with the Bored Tunnel Alternative. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would provide ramps at Elliott and Western Avenues, similar to the existing viaduct structure. Both configurations are designed to accommodate trucks and meet current design standards.

L-014-008

The Port's concern regarding grade separation for the BNSF mainline at Alaskan Way surface street in the north waterfront is acknowledged. These improvements are not currently included as part of the design for the Alaskan Way Viaduct Replacement Project. Because the project has evolved since comments were submitted in 2006, please refer to the Final EIS for current information.

- L-014-010** | communicate with our tenants to understand their needs before a final design decision is made.
- L-014-011** | **a. South Segment: Terminal 30**
The SDEIS describes an option for a south segment design (“Relocated Whatcom Yard”) that would move Whatcom rail yard to the east of its existing location. This relocation would require approximately 65,300 square feet, or about 5% of the land area on T-30. (Appendix K, p. 18-19.) The SDEIS indicates that this is not expected to result in displacing existing uses. However, the Port of Seattle is in the planning process for relocating the existing cruise terminal to Terminal 91, returning T-30 fully to container uses. We hope that move to be complete before SR-99 reconstruction begins. T-30 is, in its current size, a very constrained container facility, and loss of the land area indicated by the SDEIS would have a negative impact on the use of the terminal for containers. We could not accept such loss and concur that this should not be the Preferred Alternative.

We appreciate that the project team has worked together with Port staff since the SDEIS was closed for information to avoid loss of land on T-30. The current design alternatives accomplish this goal without the Relocated Whatcom Yard option. (Note: Appendix I, p. 34-5 discusses impacts on Terminal 30 only as a cruise ship terminal, not reflecting the proposed new use.)
- L-014-012** | **b. South Segment: Terminal 46**
Similarly, the design for the south end of the project, as described in the SDEIS, would require a significant land take on Terminal 46. It would also require all trucks serving North SIG yard from the waterfront to use an elevated structure. These design features are of great concern to us. We appreciate the project team’s efforts to address our concerns with a new, improved design developed since the SDEIS was closed to new information. We will continue to work with the project team to develop a final design that meets the freight needs for both the region and our cargo.
- L-014-013** | Remaining issues include the amount of land that will be required to accommodate a new tail track for the SIG and Whatcom rail yards on the eastern edge of the terminal. That includes its impact on truck gate lane operations, the loss of parking, and emergency access to the terminal. Poles for a new overhead utility system will need to be located to minimize impacts on the operation of the terminal. Additional concerns are related to the noise impact of

L-014-009

The project acknowledges the Port's concerns regarding mobility for the freight corridor in general, and specifically between Terminal 91 and I-5 during the construction period. Freight issues and challenges are addressed in the Final EIS and Appendix C, Transportation Discipline Report. The Final EIS and Appendix C describe the current configuration in the north project area for all alternatives, which includes reconnecting the street grid and changing Mercer Street to a two-way street. The lead agencies are committed to working with the Port to minimize impacts throughout the duration of construction.

L-014-010

FHWA, WSDOT, and the City of Seattle appreciate the Port of Seattle's cooperation to discuss the access concerns for the Port and its tenants. Access to businesses (including Port and tenant facilities) will be maintained throughout construction. If changes to access are needed during construction, the project team will work with the businesses affected to mitigate the impacts to the extent practicable.

The issue of accessibility during construction for businesses and residences will continue to be addressed in the on-going construction impacts evaluation and through ongoing work of the project staff, in coordination with stakeholders from businesses, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

L-014-011

The lead agencies for the project anticipate continued cooperation with the Port of Seattle and other prominent property owners in the project area. The potential relocation of the Whatcom Railyard to the east of its current location was previously identified as a design option. Under the current design, this option is no longer proposed and property from Terminal 30 would not need to be acquired.

L-014-015

shipside space on the apron, a small number of trucks must hold for final apron access in the eastern, outside north-bound lane. With the current street and trolley design proposal, when a trolley is stopped at an adjacent station stop, through traffic on Alaskan Way would be blocked.

L-014-016

▪ **Terminal operating characteristics**

For your information, below is further detail on our cruise ship operations. Our cruise terminals operate from May to October. Port calls occur on Friday, Saturday and Sunday, with some Monday and Thursday operations. We expect to have regular sailings on two weekdays by 2008. Passenger and goods delivery trips are generally between 8 am and 5pm. The annual schedule for ships calling at P-66 can be viewed on the port's website at:

<http://www.portseattle.org/seaport/cruise/cruiselinesandschedules.shtml#schedule>

Cruise ship port calls can generate over 1,200 passenger vehicle trips:

Number of Vehicle Trips Generated by Passengers on a Cruise Ship

Mode of Travel	Vehicle Occupancy	1,800 Passenger Ship		2,800 Passenger Ship	
		Drop-off	Pick-up	Drop-off	Pick-up
Pass. Veh. Parked ^a	2.0/veh.	165	165	210	210
Pass. Veh. Drop-off ^b	2.0/veh.	110	110	140	140
Buses ^b	33.0/veh.	100	100	128	128
Taxis ^b	2.0/veh.	110	110	140	140
Total		485	485	618	618

^aEach drop-off and pick-up generates one trip on either side of the dock. ^bEach drop-off and pick-up generates two trips on either side of the dock. (Source: Technical Transportation Traffic Impact Analysis for Cruise Ship Terminal at Terminal 31, September 3, 2002)

L-014-017

e. **North Waterfront: Other issues related to Pier 66 (the Port's "Central Waterfront Project")**

- In addition to our first cruise ship terminal, Pier 66 is also home to the Bell Harbor International Conference Center, a restaurant complex, a maritime museum, grocery market and sandwich shop, and several public access viewpoints. Our World Trade Center is located on the east side of Alaskan Way surface. These businesses rely on access along Alaskan Way surface. Both pedestrian and vehicular access is important.

L-014-018

Appendix I, p. 25, does not recognize the public access points at Pier 66. Further, Section 5.3.3, p. 41, mistakenly identifies

on- and off-ramps near the stadiums. A new S. Atlantic Street overcrossing will improve connections between the Port of Seattle and major freeways by allowing traffic to bypass passing trains.

L-014-014

WSDOT and the Port of Seattle completed the purchase of Pier 48 in August 2008. As identified in the 2006 Supplemental Draft EIS, both the Cut-and-Cover Tunnel Alternative and Elevated Structure Alternative would displace the Alaska Square Park. As identified in the 2010 Supplemental Draft EIS, WSDOT intends to use the uplands for contractor parking as part of the construction-related activities for the Bored Tunnel Alternative. These activities would not affect Alaska Square Park.

L-014-015

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

L-014-016

Thank you for the information provided.

L-014-017

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the

L-014-022

the rationale for selecting project components for the core project (e.g. for including Steinbrueck Park walkway rather than the north seawall), and outline the traffic and economic impacts of focusing on the core project only.

We are particularly concerned that the northern portion of the seawall is not included in the core project. Yet its failure, and related failures of the main rail line and Alaskan Way surface, would have severe impacts on international trade, and the economy of the region. The FEIS should address the impacts of a potential failure of the north seawall. We cannot lose sight of this critical infrastructure. We look to the City for a funding and implementation plan that ensures it will be replaced within a reasonable timeframe.

It will also be critical to consider the timing of providing the Aurora improvements north of Battery Street Tunnel since construction will require the full or partial closure of Aurora north of the Battery Street Tunnel. Construction of this project component must be coordinated and timed to minimize disruption to both the SR-99 and the east-west corridor.

L-014-023

7. Coordination with proposed land use changes

The SDEIS summarizes concurrent land use and comprehensive planning efforts along the waterfront and in the South Downtown area, the City's Waterfront Concept Plan and the Livable SODO plan (Appendix G, p. 15-17). It discusses the continued need for industrial land within the City's boundaries, 77% of which are located adjacent to the south end of the project, and points to future City policies "for protecting industrial land for industrial uses". Yet, the document then goes on to indicate that, by providing improved connections between Pioneer Square and the waterfront, it may reinforce zoning changes being considered under the Livable SODO planning effort.

The Port has consistently voiced concerns with regard to plans to change zoning designations and densities in the stadium overlay area. We continue to oppose any changes in zoning or increased densities that have the potential to negatively impact access to and the viability of our container terminals, in particular T-46 in this case. The project should not be used as a stepping stone for facilitating such change with deleterious impacts to industrial operations.

L-014-020

Where elements such as the public seating and viewing area associated with the Lenora Street bridge are disturbed by the project, the lead agencies are committed to restoring those elements to a condition that is equivalent to the original.

L-014-021

The issue of accessibility during construction for businesses and employees shall be more directly addressed in the ongoing construction impacts evaluation and through ongoing work of the project staff with the Waterfront Piers, Pioneer Square, and Downtown. The project will maintain access to all waterfront businesses during all phases of project construction, regardless of alternative.

L-014-022

There is no longer a core versus full project. After the 2006 Supplemental Draft EIS was published, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2006, please refer to this Final EIS for the current information.

The Final EIS and Appendix B, Alternatives Description and Construction Methods Discipline Report, describe the current alternatives. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront. With the Bored Tunnel Alternative, the seawall would be replaced by the City-led Elliott Bay Seawall Project. If the Cut-and-Cover Tunnel Alternative or

8. Environmental impacts

a. Air quality

L-014-024

▪ **Toxics**

This region is in attainment with all National Ambient Air Quality Standards (NAAQS). The highest air quality priority is reduction of exposure to toxic air pollution. The SDEIS air report compares modeling results to the NAAQS with an emphasis on carbon monoxide which has not been a problem pollutant in this region for a decade or more. Air toxics from mobile sources, especially diesel engines, pose the greatest risk to the public from urban air pollution. The SDEIS reflects that EPA rules reducing emissions from mobile sources will reduce air toxics even though VMT is increasing. The SDEIS analysis does not evaluate the magnitude of the health risks compared to the existing, construction, and operational phases.

The project should consult with the Puget Sound Clean Air Agency regarding adequate evaluation of the risks and mitigation to assure adverse public health impacts are avoided during construction and operation of the new facility. Failure to do so could put costly additional pressures related to air toxics on future projects. The Puget Sound Clean Air Agency has requested much more detailed modeling of air toxics impacts as part of environmental evaluations for redevelopment projects that include diesel sources. All entities with projects related to diesel emissions, should do the same to help avoid adverse public health, economic, environmental, and operational problems in the future.

L-014-025

▪ **Alternatives and air quality**

The tunnel alternative would result in lower air emissions from the viaduct along the length of the underground sections, so it is probably the best choice for air quality reasons. However, the highest levels of particulate pollution in the City are measured at a monitoring station in the Duwamish so special care to avoid increasing emissions at the south end of the tunnel is needed to minimize risk to public health and to avoid violation of National Ambient Air Quality Standards. The vent for emissions referenced in Section 5.1.3 should be vented through an air pollution treatment device to avoid hot spot exposures in the waterfront area if it is used for more than emergency purposes as stated.

Elevated Structure Alternative is selected, the seawall would be replaced as part of the project.

L-014-023

The project is not expected to facilitate a substantial amount of new development. The preferred Bored Tunnel Alternative would create the potential for some new development opportunities including sites in the south project area. Through its planning efforts in the South Downtown area, the City is studying future land uses there and will consider the appropriateness of zoning designations or density levels that differ from existing uses. The City Planning Commission has also recommended that City staff develop a strategy to address the protection of industrial land and uses throughout Seattle, including the south downtown area. It is expected that policies adopted as a result of these efforts will have a greater influence in guiding future development proposals in the project area than the the build alternatives.

L-014-024

A Memorandum of Agreement has been developed between WSDOT and the Puget Sound Clean Air Agency to help eliminate, confine, or reduce fugitive dust during the construction period. State and federal environmental regulations, as well as the air conformity regulations, will be followed. Please see the Final EIS Appendix M, Air Quality Discipline Report, for the current methods used to assess air quality effects for this project and for the effects discussion. Mitigation measures will be in place during the demolition and construction of the project as discussed in Chapter 8 of the Final EIS, and in the Air Discipline Report.

Mobile Source Air Toxic (MSAT) emissions have been analyzed in the Final EIS. This analysis follows FHWA guidelines. FHWA has developed this approach because currently available technical tools do not allow a prediction of the project-specific health effects (such as health risks) that would result from the potential emission changes associated with a

L-014-026

- **Efficient truck and goods movement**
The completed project must enhance connectivity for trucks coming to and from the Port both during construction and in final operation to assure excess idling and extra trip length do not increase emissions resulting in problems noted above. Efficient goods movement is very important for air quality since trucks operate through the City. People located closest to the sources are the most impacted. The highest levels of air pollution are measured in the south harbor area so attention to freight efficiency is vital.

L-014-027

- b. **Noise and vibration**
The proposed new south end design, as well as the design contained in the SDEIS, moves the tail track for the SIG and Whatcom rail yards close to the administrative building on T-46. The project must take care to minimize and mitigate noise and vibration impacts generated by switching movements on staff in that building.

L-014-028

- c. **Parks and recreation**
Our concerns about the potential loss of public access owned and operated by the Port are outlined above in section 5.f.

L-014-029

- d. **Fisheries, wildlife, and habitat**
The Port's 2004 DEIS comments on the fisheries, wildlife, and habitat included the following statement:
"Potential aquatic habitat compensation actions linked to seawall, tunnel, and Colman Dock improvements are described at four existing Port facilities:
 - Pier 70/Myrtle Edwards Park—this is assumed to include Elliott Bay Park as well;
 - Pier 89;
 - Pier 48; and
 - The northeast corner of Terminal 5.
 However, the Port has also identified these sites for mitigation of its own projects if future Port development requires habitat mitigation. The Port's costs for future mitigation would be much higher if the preferred alternative utilized these sites and the Port were forced to find alternative mitigation sites. Our preference is to

project. These limitations and more information on the MSAT analysis is discussed in the Final EIS Appendix M, Air Quality Discipline Report.

L-014-025

The exhaust from the ventilation stacks and tunnel portals were modeled in the Final EIS, and, based on this modeling, no exceedance of the National Ambient Air Quality Standards (NAAQS) would occur. In addition, the air that will be released through the tunnel's portals and ventilation stacks will primarily be air--with vehicular contaminants being only a very small fraction of the exhausted air. As such, any treatment system would have to process huge amounts of air to control very small (and diluted) amounts of pollutants. This would require very large and expensive emission control equipment (e.g., scrubbers, electrostatic precipitators, etc.) as well as the generation of substantial amounts of electricity (that would in turn generate additional air pollutants), which, according to the results of the air quality analyses, are not needed to meet the applicable air quality standards at nearby sensitive land uses.

L-014-026

The project team will work with the Port of Seattle to ensure that access to businesses and Port activities is maintained throughout construction. If changes to access are needed during construction, the project team will work with the Port to mitigate impacts to the extent practicable.

The build alternatives presented in the Final EIS, along with the S. Holgate Street to S. King Street Viaduct Replacement Project, will enhance connectivity for freight between SR 99, SR 519, and the waterfront via the new SR 99 stadium area interchange. This should help reduce delay and idling and reduce vehicle emissions in the immediate area.

L-014-031

Chapter 1 of the SDEIS describes the “Changes Made to Construction Plans” (page 4). In that section it states that “the Tunnel and Elevated Structure Alternatives could be built under any of the three construction plans.” The time frames listed range from 7 to 9.5 years for the tunnel alternative and 6.5 to 10 years for the elevated alternative. Therefore, other media that compare these two alternatives should use the full range of construction options for both alternatives rather than just the analysis assumption used for the purpose of the SDEIS.

L-014-032

2. Analysis and comparison of construction scenarios

In addition to proposing design changes, a second reason for publishing a Supplemental DEIS was to provide information on new options for construction planning. However, while the document does outline three different construction scenarios, it does not address major construction-related issues that are of critical importance to the Port, the waterfront, and the region as a whole. It provides only minimal information on what will happen under different construction scenarios, stages, and/or methods. We are unable to interpolate the impacts on a parcel-by-parcel basis along the waterfront, nor the impact on the corridor itself, and nor extrapolate the impact on the region as a whole. For example, the exhibits addressing Alaskan Way do not distinguish closure information south of Pike and north of Pike, where we know closures will also be necessary for Seawall construction.

We cannot support any construction plan that does not provide adequate information.

L-014-033

3. Economic impacts

Like the DEIS, the SDEIS focuses the analysis of economic impacts on jobs, sales and taxes related to construction activities, and the impact on businesses in the immediate vicinity of the project. It alludes to, but does not describe, any broader impacts. It does not evaluate the economic impact of different construction scenarios, stages, and/or methods beyond these factors. This applies to the impact of prolonged lack of access to waterfront businesses, including our terminals. As the largest property owner in the project area, we are concerned about impacts to our terminals, piers and other facilities. For example, we cannot see how our cruise terminal at Pier 66 and operations at Pier 69 can function with the Broad St. Detour in place: review of the Appendix P, Section 6.1.5, reflects limited understanding of cruise ship operations, referencing only passengers and charter bus access. Nor does the SDEIS address the economic impact of project-related congestion lasting for several years on the region as a whole. The SDEIS also does not contain mitigation strategies that could be employed to buffer these impacts, nor does it identify the costs of such measures.

construction effects of each of the alternatives are described in Final EIS Appendix C, Transportation Discipline Report. For environmental documentation purposes, the worst stage of construction for traffic was analyzed quantitatively while the overall construction activities were described qualitatively. Demolition of the existing Alaskan Way Viaduct would occur as part of the viaduct replacement project. As part of that project, standard maintenance of traffic during construction plans will be developed, communicated with the general public, and implemented during project construction. As part of the Bored Tunnel project and related projects, WSDOT and partner agencies have or will implement several strategies to keep traffic moving during construction. 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. WSDOT will prepare a traffic management plan, which will contain localized traffic mitigation measures. These measures will be developed as construction details are refined. Please see the Final EIS, Appendix C, Chapter 6 of the Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

Because operational effects of the built alternative would be substantially better than the Viaduct Closed (No Build Alternative), long-term transportation mitigation measures are not anticipated. However, a number of mitigation measures in place during construction could have benefits over the longer term. Refer to Chapter 8 Mitigation in the Final EIS for details.

L-014-031

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at

L-014-033 | How can our region, or the state, make a rational decision on construction of a project of this magnitude without thoroughly understanding the economic impacts, and the cost and impact of any mitigation strategies, before any decision is made? Both the impact on the businesses along the corridor, in particular along the waterfront, and the impact on the regional economy must be evaluated. We understand that the project team is in the process of developing a business mitigation plan, and expect that it will address the broader as well as the immediate impacts of construction. We cannot support any construction plan without that information.

The Port must understand the impacts of the project on its facilities, its tenants, and their business operations, as well as the cost and impact of applicable mitigation strategies, to be able to participate in funding the project. The limited information that is currently available indicates that economic impact and mitigation costs to the Port and its tenants could comprise a substantial portion of the Port's proposed financial participation in the project.

L-014-034 | **4. Closure of Western/Elliott Avenue ramps**
Exhibit 7-3 of the SDEIS compares the closure times of SR 99 access ramps for the various construction plans. For both the shorter and intermediate construction plans, the Elliott Avenue on-ramp would be closed for an estimated 42 months; for the longer plan, it would be closed for an estimated 75 months. The Western Avenue off-ramp would be closed for an estimated 42 months for the shorter plan and for 63 months for both the intermediate and longer plans. These very long closures will significantly affect access to and from Ballard and Interbay, where the Port has substantial facilities. The AWV design team should evaluate all possible construction methods to minimize the closure time for these ramps.

L-014-035 | **5. Temporary facilities**
The SDEIS retains the Broad Street Detour design as temporary facility intended to maintain an "open corridor." This would have profound impacts on the waterfront. The SDEIS contains no analysis of these impacts. It is unclear under which construction scenarios the detour would be required, and for how long. In-depth analysis will be needed to understand the implications of the detour alternative, including cost, corridor traffic flow, and the impact on businesses and traffic flow on the North Waterfront.

L-014-036 | Specific issues regarding this temporary facility that must be evaluated mirror those expressed with regard to the 2004 DEIS:

least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

L-014-032

The information provided in the 2006 Supplemental Draft EIS describes construction in sufficient detail to convey the impacts to distinct portions of the project area and to support selecting which construction approach should be used. The Final EIS provides the current construction information. The lead agencies have been coordinating with the Port of Seattle as a major regional stakeholder since the project's beginning, and would be glad to meet with Port staff to review construction planning and potential construction impacts on Port properties or functions, as the project moves toward final design.

L-014-033

The types of impacts identified in the comment are secondary economic impacts. For the purposes of this EIS, the degree of accuracy regarding the secondary impacts are placed at the business-district level. Because of the diversity of business types along the entire 2-mile corridor, a business-by-business analysis is not feasible and beyond the scope of

L-014-036

- Traffic volumes/impact on Alaskan Way surface south of the touchdown (near Vine or Wall Streets).
- Impact on cruise ship access at Pier 66. Currently, all truck and most bus staging takes place from the outside north-bound lane due to turn radius needs. Taxi staging occurs in the south-bound parking lane. There is no alternative terminal available to accommodate these port calls.
- Access to the “north apron” of Pier 69, which provides loading docks and minor on-site parking, including ADA parking. One of our tenants, Fugro Seafloor Survey—a water-dependent business, requires large truck (WB-67) access for heavy equipment.
- Impact on Clipper Navigation’s operation. Currently, Clipper Navigation ground access relies on a curb lane on Alaskan Way surface adjacent to their loading dock at P-69 on the north apron for taxi queuing, charter bus parking and loading, as well as private automobile pick-up and drop-off. In 2005, Clipper Navigation served over 335,000 passengers.
- Impact on south-bound movement of traffic from Ballard/Interbay.

L-014-037

6. Coordination with other projects

The SDEIS lists a number of transportation projects for which construction could overlap with AWV replacement. These include SR-519, Spokane St., Link Light Rail, Colman Dock, I-5, I-405. It also points out that other construction projects within the City’s boundaries, such as new development in the South Lake Union area, could have impacts on the street system in that area. The document rightly points out that “If construction periods for these projects overlap, they could have a cumulative impact.” The project team is expected to work with responsible agencies to avoid and minimize cumulative impacts.

We agree with the project team that coordination will be of critical importance. Unfortunately, the SDEIS does not yet contain any guidance as to how these impacts could be avoided. There is a need for a coordinated mitigation plan addressing the various public construction projects. Local development projects should be required to address the cumulative impacts of street closures due to construction activities that occur concurrently with AWV replacement.

L-014-038

7. Capacity and functionality of rail operations

The SDEIS states that train traffic along the mainline north of the north tunnel portal could be affected and interrupted by construction activities for a new retaining wall. The northern mainline is a critical freight and passenger corridor. Any rail disruptions must be kept to a minimum, both

this EIS. The Final EIS identifies those business districts that clearly have identifiable risk factors that will be directly affected by the project, such as loss of parking for Pioneer Square. The Final EIS also includes mitigation measures that will be tailored to specific high-risk business districts, including the Central Waterfront.

The economic analysis, as presented in the Final EIS, accounts for those impacts and benefits which are under the direct control of the project. Indirect and secondary impacts and benefits are identified when they can be reasonably tied to a general project activity. To go beyond this would be speculative and any conclusions that would be drawn would be subject to forces not reasonably related this project.

Port of Seattle operations are not expected to be obstructed; however, they will experience some freight mobility congestion. The cost of congestion for freight mobility is presented in the Final EIS. The regional cost of congestion for passenger cars is also discussed in the Final EIS. Mitigation measures are included in Chapter 8 of the Final EIS.

L-014-034

The lead agencies recognize the critical importance of the entire SR 99 facility, including the Elliott Avenue and Western Avenue ramps. The 2006 Supplemental Draft EIS discusses the trade-off between maintaining partial traffic capacity on the facility during construction and the savings in cost and time of closing it to traffic while construction is underway. Construction under traffic is also inherently less safe than closure, both for the construction workers and for the traveling public. Also, some designs lend themselves to construction under traffic better than others. See the Final EIS, Chapters 3 and 6, for the current description of the construction plan for each proposed build alternative.

L-014-035

The Broad Street Detour described in the Final EIS is only for the

L-014-038 | along the mainline and in the yards. The construction of the south end will require some track relocations.
 Yet, Appendix C, the Transportation Discipline Report, does not discuss rail operations or how they could be impacted during construction. Please describe the potential impacts of construction to rail operations, and the mitigation to minimize these impacts.

L-014-039 | **8. Access and impacts to Port Properties**
 The SDEIS does not provide a traffic and/or business mitigation plan for the businesses along the waterfront, including our tenants, although it states that such plans will be developed. We urge the project team to work with the Port, its tenants, and other property owners on the waterfront to develop such a plan immediately and provide opportunities for public comment. Based on the limited information currently available, we offer the following comments:

L-014-040 | **a. Construction staging and traffic management in the South end**
 ▪ The SDEIS does not specify the location of any construction staging sites in the south end, but indicates that there would be multiple sites. The location of these staging areas and detours in the south-end could potentially have a major impact on container operations at T-25, 30 and 46. All existing terminals fully utilize their respective footprint for container operations, and the redevelopment of T-25/30 to its former use as a container terminal (by 2008) also relies on use of its entire footprint. Construction staging and lay-down areas must maintain the functionality and capacity of both our container terminals and drayage routes.

We cannot support any construction plan that does not provide adequate information or generates significant impact on our container terminals or drayage routes.

▪ Staging areas and detours must be designed to maintain both functionality and unimpeded access to all three terminals. Drayage routes must be maintained, and any constraints on these routes need to be discussed with our staff and terminal operators.

L-014-041 | ▪ The 2004 DEIS alluded to use of Port property for staging and other purposes during construction. We anticipate working with the project team to identify those Port properties where temporary use is feasible without negative impacts on the functionality of our facilities, and to negotiate temporary

Elevated Structure Alternative. The detour would construct a temporary trestle structure from approximately Alaskan Way and Vine Street to the intersection of Broad Street and Western Avenue. The Broad Street Detour would be in place for approximately 27 months while the improvements to the Battery Street Tunnel are completed. An updated description of the alternatives and of construction-related transportation effects is provided in the Final EIS and Appendix C, Transportation Discipline Report.

L-014-036
 The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

L-014-037
 We agree on the need for continued close coordination and look forward to the Port's continued participation. Chapter 7 of the Final EIS discusses the potential cumulative effects of other transportation projects that may overlap with the Alaskan Way Viaduct Replacement Project.

L-014-038
 Overall construction effects of each of the alternatives are described in Final EIS Appendix C, Transportation Discipline Report, Chapter 6. For environmental documentation purposes, the worst stage of construction was analyzed quantitatively while the overall construction activities were described qualitatively. As part of that project, standard maintenance of

- L-014-041** | construction easements where appropriate. Where construction would adversely impact access for the Port and/or its tenants, we will need to negotiate access and mitigation with the project team.
- L-014-042** |
- The SDEIS designates East Marginal Way as a haul route for construction traffic. We generally agree that it is a good idea to designate East Marginal Way as a dedicated truck route. Our staff will continue to work with the project team to ensure that port-related drayage movement can flow between all our terminals and both the north and the main gates to the SIG rail yard as needed. This is particularly important for the terminals on East Marginal Way—T-46, 30, and 25.
- L-014-043** |
- The maintenance facility for the Port’s seaport, and many of its public access points and parks, is located at Horton St. The Viaduct construction staging and project-related congestion will make it difficult for our staff to continue to effectively serve the multiple seaport facilities they care for, many of which are north of the central waterfront. The CTMP and Business Mitigation Plan should also address impacts and strategies for these trips.
- L-014-044** |
- b. South end project construction**
- Due to the proximity to some of our major container terminals, the construction staging and management approach for the south end of the project is of critical importance to the Port. We very much appreciate the cooperative effort used to address Port concerns in the design process. However, we have not yet received detailed information, or had any discussions on how this project component will be constructed. Port staff will need to be involved in the development of the construction management and mitigation plan to ensure the continued operation of our terminals and drayage routes during construction.
- L-014-045** |
- c. Access to the Port’s north waterfront properties**
- **Pier 66 for cruise ship operation**
The SDEIS does not address access to P-66 for cruise operations. Both access for passengers and trucks must be ensured during the cruise season. (See Section A.5.d of this letter for quantitative information.). The same operating requirements apply during the construction period:

traffic during construction plans will be developed, communicated with the general public, and implemented during project construction. Minimal effects on rail operations are foreseen. The S. Holgate Street to S. King Street Viaduct Replacement Project that is currently under construction will separate street and train traffic. A primary objective of this project is to minimize effects on freight and passenger rail operations. If closures of the rail line are necessary, they would be temporary.

The Elliott/Western Connector is conceptual at this stage and will be the subject of a separate environmental review process. The new roadway connecting Alaskan Way to Elliott and Western Avenues (in the area between Pike and Battery Streets) would be four lanes wide and would provide a grade-separated crossing of the BNSF mainline railroad tracks. The Elliott/Western Connector would provide a connection from the Alaskan Way surface street to the Elliott/Western corridor that provides access to and from BINMIC and neighborhoods north of downtown Seattle (including Ballard and Magnolia).

L-014-039

As promised in the 2006 Supplemental Draft EIS, construction mitigation plans have been developed in cooperation with the Port of Seattle and other stakeholders in the project area. These measures are included in the Final EIS. The comments provided in this letter and by the Port during the planning process have been helpful and incorporated to the extent practical.

L-014-040

Information on construction staging sites has developed and is presented in Chapter 3 of the Final EIS. The project acknowledges the importance of maintaining access to the Port of Seattle terminals (particularly Terminals 25, 30 and 46). It is a construction planning assumption that the project will maintain access to Port facilities during

L-014-048

now docking at Terminal 30. Access for provisioning and trucks and busses from the airport are critical:

There are generally two ships in port at the same time. Currently, there are two weekend-day and one week-day sailings. We expect the number of weekday sailings to increase by one or two weekdays during the construction timeframe. Depending on the size of the ships in port, two cruise ships calling at T-91 would generate 100-150 truck, 350-500 bus, and 4,750-6,000 car, taxi, van or limousine trips, totaling between 5,200 and 6,700 trips over the course of a day. The majority of passenger trips will occur between T-91 and the airport.

L-014-049

e. Utilities and public services

The SDEIS describes utility relocations in a generic fashion. It does point out that the south end will require a large number of temporary and permanent relocations, especially with a tunnel alignment. Please work with our engineers, maintenance staff, and terminal operators, as well as the railroad, to keep service disruptions to our terminals and the rail yards to a minimum. Disruptions, to the extent they are unavoidable, should be timed to minimize the impact on operations. Issues include power and gas shut-downs—recent power shut-downs on the terminal were limited to four hours or less and took place on days when there was little or no cargo activity. Also of concern is the major stormwater and sewer outfall at King St.

For the north waterfront, the SDEIS indicates that there are no utility relocations required for an elevated structure. However, relocations will likely be necessary during seawall replacement and soil stabilization efforts. The FEIS should address these issues. Again, any service disruptions should be minimized and coordinated with our maintenance staff and our tenants.

We are also concerned about emergency access and the availability of water for fire fighting purposes. The SDEIS points to potential temporary restrictions for emergency access and the fact that water may not be available during relocation of fire hydrants. These services must be available at all times.

Due to the large number of utilities involved, utility relocation will be managed by many different utilities, and carried out by an even larger number of contractors. We support the concept of a consolidated utility relocation plan, which provides one point of contact for any utility-related work.

Viaduct Replacement Project addressed in this Final EIS, a detailed discussion of the construction effects on transportation facilities and services is provided in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report. Also included in Chapter 6 is a listing of the planned construction mitigation activities which should help address effects associated with the planned construction activities north of King Street.

L-014-044

Construction staging, is discussed in the Final EIS, Chapter 6 Construction Effects. More detail on the proposed staging areas can be found in Appendix G, Land Use Discipline Report, Chapter 6. WSDOT will continue to discuss the construction plans and staging areas near the south portal with the Port to minimize impacts. The project team appreciates the continued coordinated with the Port.

L-014-045

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

The preferred alternative for the replacement of the Alaskan Way Viaduct is now the Bored Tunnel Alternative. One of the major benefits of this alternative is the ability to maintain operations on the existing SR 99 facility while the tunnel is being constructed. The Bored Tunnel Alternative would not construct the Broad Street Detour. The Broad

L-014-050

f. Seawall and relieving platform construction affecting Port terminals and/or piers

In reviewing the SDEIS, we noted that the document proposes significant construction activity near and/or under Port-owned piers and/or terminals, in particular T-46 and Piers 48, 66, and 69. Issues of concern to the Port include:

- Lack of reference to fender piles west of the seawall;
- Removal of riprap and installation of temporary sheet pile under piers west of the seawall;
- Maintaining under-pier utility connections;
- Excavation of the entire relieving platform; and/or
- Jet grouting work performed in an area where wooden piles are supporting the relieving platform. We are not confident that the concrete will flow sufficiently around these obstacles.

Please coordinate any potential work related to the seawall or the relieving platform behind the seawall near our piers and terminals with our engineering and environmental staff. Any impacts on our facilities or tenants related to these activities will need to be mitigated.

L-014-051

9. Traffic mitigation strategies

The document begins to outline traffic mitigation strategies, and the Port generally agrees with the direction taken by the project. However, we are concerned that the SDEIS does not contain a fully developed Construction Transportation Mitigation Plan—although we understand that it is under development. Nor does the document contain any information on the impact or cost of proposed mitigation strategies. Understanding the traffic impacts, and the cost and impact of any mitigation strategies, is critical. The Port must understand the impacts of the project on its facilities, its tenants, and their business operations, as well as the cost and impact of applicable mitigation strategies, to be able to participate in funding the project. We are concerned that:

- It is difficult to understand the impact of the strategies as a package. How do these strategies work together to mitigate the project's impacts? What impact do they have on traffic in the region, beyond a localized effect?
- The information provided does not yet describe the intended and/or expected impact of the proposed strategies. That makes it difficult to tell how useful the strategies are, or whether the list includes all important, let alone all viable strategies.

Street Detour described in the Final EIS is only for the Elevated Structure Alternative.

L-014-046

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

L-014-047

The lead agencies plan to maintain access to businesses and residences throughout construction, including the parking structure mentioned by the commenter. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

L-014-048

The Elliott/Western Connector is conceptual at this stage and will be the subject of a separate environmental review process. However the new roadway connecting Alaskan Way to Elliott and Western Avenues (in the area between Pike and Battery Streets) would be four lanes wide and would provide a grade-separated crossing of the BNSF mainline railroad tracks.

L-014-051

- It would be useful to outline the goals/results of the package with regard to the main user groups/O-D pairs. Show who the target/main beneficiaries are, what is being implemented for each of the major user groups, and how it will support that group's mobility needs. Of particular concern to us is 1) Container freight among port terminals, rail yards and the highway system, 2) Cruise ships & passenger vessels, & 3) Airport.

That being said, the Port supports most of the strategies presented in the document (reference Section 10 below), they appear to be useful in mitigating the impact of AWV construction. We are looking forward to a traffic mitigation plan that provides more detailed benefit-cost information, as outlined above.

L-014-052

10. Freight mobility

The Port's general concerns regarding the status and contents of the traffic mitigation plan are presented above. The following specifically addresses freight mobility during construction.

The general objectives which form the basis of the mitigation strategies (presented in Appendix C, p. 154) are highly transit focused with only one reference to the movement of goods. Given the importance of freight movements especially in the Duwamish, higher visibility should be given to it as an objective.

L-014-053

a. Provisions for truck movement

The SDEIS outlines some of the impacts of construction on freight mobility and provides some preliminary strategies for supporting freight mobility during construction. However, the document does not evaluate truck detours and alternative routes sufficiently.

We understand that the current list of strategies is preliminary, and urge the project team to work closely with the freight community to expand and improve on the list of strategies targeting truck mobility to ensure that trucks can move. This includes both making the movement of freight a priority in critical truck corridors and suspending the prohibition on large trucks on at least one north-south street downtown. The congestion generated by construction will have a dampening impact on our economy. Ensuring that freight can continue to move is essential in minimizing and mitigating this impact. Treating trucks like cars on all facilities and at all times of the day will not be sufficient to achieve this goal.

As discussed in Appendix P, p 47, freight traffic (such as diesel fuel trucks) moving between the Duwamish and the BINMIC will

The Elliott/Western Connector would provide a connection from the Alaskan Way surface street to the Elliott/Western corridor that provides access to and from BINMIC and neighborhoods north of downtown Seattle (including Ballard, Magnolia, and Pier 91). The project team will continue their coordination activities with business and residential stakeholders, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups to minimize construction effects. WSDOT will prepare a traffic management plan, which will contain localized traffic mitigation measures. These measures will be developed as construction details are refined. Please see the Final EIS, Appendix C, Chapter 6 of the Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

L-014-049

Final EIS Appendix K, Public Service and Utilities Discipline Report, discusses impacts to public services and utilities in greater technical detail. Utility relocations will occur after extensive coordination between the project design team and utility providers. Utility disruptions will be minimized where practicable. Timing and scheduling of utility disruptions will be coordinated with the utility providers as design proceeds in future design phases and during the construction phase. The lead agencies will also coordinate with public service providers to maintain emergency response times or provide satisfactory mitigation. See Appendix K for more information about proposed mitigation measures to ensure that disruptions to utilities and public services are minimized.

L-014-050

Under the preferred alternative, the Bored Tunnel Alternative, seawall replacement would occur as an independent project led by the City of Seattle. The project would not touch the seawall or relieving platform if the preferred alternative is selected.

L-014-056

- Most of the trucks serving the Port already operate outside of the commuters' peak hours. That's because our truckers don't like being stuck in traffic and are already avoiding it whenever and wherever they can.
- With the exception of a limited number of streets in the immediate vicinity of our container terminals and the rail yards, Port-related truck traffic comprises a small percentage of overall traffic. Trying to change the times in which our cargo moves may not be the best use of scarce resources.
- The Port doesn't operate its terminals, we are the landlord. We cannot tell our tenants when they should do business any more than someone who is leasing store space to someone else.
- Our tenants also do not operate in a vacuum—there are very complex labor rules and contracts that need to be honored. Changing those is difficult. The vast majority of businesses that receive freight from the Port are only open during daytime hours.
- Our tenants already open their gates and work at night when there is enough cargo to make it worthwhile—and when there is an open door at the other end of the trip. (This is the case for all of our intermodal business, that is the containers that move between our terminals and the rail yards.) One of our terminals is already operating a container yard off-site, and spending its own money to truck containers there when there is little traffic, and the businesses who own them can pick them up at their own convenience. If they aren't doing more of it, it means that it does not make economic sense.
- Keeping terminals open at night is very expensive. A cursory analysis indicates that it costs about \$60,000 per night in ILWU labor alone to keep T-5, 18, and 46 open—at five nights per week that would amount to over \$15 million per year. This does not yet include other costs like terminal staff and operating expenditures, security, trucking, etc.

L-014-057

11. Environmental issues

The Port commented extensively on the environmental impacts of construction described in the DEIS. Most of these concerns still need to be addressed today. Following is a list of issues that are of special interest to the Port.

- Provide information about travel alternatives and incentives to encourage use of transit, carpool, and vanpool programs.

In addition, WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

The lead agencies look forward to coordinating with the Port in the process of refining the strategies included as construction transportation mitigation measures.

L-014-052

Refer to Chapter 8 Mitigation of the Final EIS for more current information on mitigation measures. In addition, WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

L-014-053

Further analysis of the traffic effects during construction has been conducted. The Final EIS Appendix C, Transportation Discipline Report, has been updated to address more fully the needs of the freight community.

The freight mobility strategies presented in the Transportation Discipline Report will continue to evolve over the course of the project. Input from the Port and the freight community via direct outreach, plus special workshops, have been incorporated in the Transportation Discipline Report.

The lead agencies are committed to working with freight interests to minimize operational impacts during the construction. Continued dialogue among all stakeholders will continue to be an important and essential part of project development and implementation.



September 22, 2006

Mr. Douglas B. MacDonald
Secretary of Transportation
State of Washington
Transportation Building
PO Box 47316
Olympia, WA 98504-7316

The Honorable Greg Nickels
Mayor
City of Seattle
Seattle City Hall
600 Fourth Avenue, 7th Floor
Seattle, WA 98104-1876

Re: Port of Seattle—Viaduct/Seawall Replacement SDEIS Comments

Dear Secretary MacDonald and Mayor Nickels:

L-014-063

Thank you for the opportunity to comment on the *Supplemental Draft Environmental Impact Statement for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project*. This project is vital to the Port's and the region's future. We appreciate the progress that has been made since we submitted our comments to the DEIS two years ago:

- We fully support the decision to carry forward only the alternatives that retain the existing capacity of the corridor. The region, and the state, cannot afford the congestion and related economic impact of the 40-50% reduction in capacity that a surface alternative would create.
- We appreciate that both remaining alternatives now retain the Elliott/Western ramps, unlike the DEIS. They are essential for moving freight between the city's two manufacturing-industrial centers. They also provide access from the viaduct to a proposed cruise terminal at Terminal 91.

We will continue to work with the project team to develop a final design and construction management approach that meets the freight needs for both the region and our cargo. This includes:

- The design and construction staging/lay-down concepts for the south end of the project, as described in the SDEIS, would require a significant land take on Terminal 46 and, potentially, Terminal 25/30. T-46 operates on very constrained footprint, and the redevelopment of T-25/30 to its former use as a container terminal (by 2008) also relies on use of its entire footprint. The SDEIS design would require all trucks serving

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discussed in the Environmental Assessment for that project.

Construction noise levels would meet the City of Seattle noise ordinance for industrial zone properties, such as Terminal 46. The lead agencies developed noise and vibration mitigation measures for this project. To reduce construction noise at nearby receptors, mitigation measures such as those discussed in Chapter 8 of the Final EIS and in Appendix F, Noise Discipline Report, would be incorporated into construction plans, contractor specifications, and variance requirements.

WSDOT will work closely with the Port to resolve any issues with the security cameras.

L-014-061

FHWA, WSDOT and the City of Seattle appreciate the Port of Seattle's comments regarding in-water work near the Pier 66 marina. WSDOT will coordinate with Port staff regarding work in the vicinity of Port-owned properties for the Cut-and-Cover and Elevated Structure Alternatives. No in-water work is proposed as part of the preferred Bored Tunnel Alternative. Specific reference to the listed Port properties was eliminated for the Final EIS as potential mitigation sites. Coordination will continued between WSDOT, the Port, and other entities for developing appropriate mitigation for improving the marine habitat of Elliott Bay. The City of Seattle is leading redevelopment efforts and associated environmental reviews processes for the central waterfront, which would take place under NEPA and / or SEPA as appropriate. In addition, the project compliments a number of other projects with independent utility that would provide other improvements such as the seawall replacement, transit enhancements, and a new Alaskan Way Promenade and public space. These individual projects include the moving forward projects identified in 2007, as well as improvements recommended as part of the Partnership Process. Please refer to Chapter 2, Alternatives Development, of the Final EIS for a description of these projects.

L-014-063

the North SIG rail yard from the waterfront to use an elevated structure. Construction staging and lay-down areas, while as yet unidentified, could have a significant impact on container drayage and terminal operations. We appreciate the project team's efforts to date to address our concerns with a new, improved design developed since the SDEIS was closed to new information. However, final design and construction must maintain the functionality and capacity of both our container terminals and drayage routes.

- The SDEIS proposes partially lowering Aurora from the Battery Street Tunnel to Republican Street, in conjunction with a design for a widened, two-way Mercer Street. The design and construction sequencing of these new components must provide for a viable truck corridor between Terminal 91 and I-5.

In addition to proposing design changes, a second reason for publishing a Supplemental DEIS was to provide information on new options for construction planning. However, while the document does outline three different construction scenarios, it does not address major construction-related issues that are of critical importance to the Port, the waterfront, and the region as a whole:

- The traffic analysis presented in the document shows the impact of losing the street and highway corridor. It does not address impacts to rail capacity. It provides only minimal information on what will happen under different construction scenarios, stages, and/or methods. It also does not give information on the impact of any potential traffic mitigation strategies. This applies to the impacts on a parcel-by-parcel basis along the waterfront, the impact on the corridor itself, and the impact on the region as a whole. The document begins to outline traffic mitigation strategies, but does not contain any information on their impact.
- The SDEIS also does not evaluate the economic impact of different construction scenarios, stages, and/or methods. This includes the impact of prolonged lack of access to waterfront businesses. As the largest property owner in the project area, we are concerned about impacts to our terminals, piers and other facilities. For example, we cannot see how our cruise terminal at Pier 66 and operations at Pier 69 can function with the Broad St. Detour in place. Nor does the SDEIS address the economic impact of project-related congestion lasting for several years on the region as a whole. The SDEIS also does not contain mitigation strategies that could be employed to buffer these impacts, nor does it identify the costs of such measures.

Understanding the traffic and economic impacts, and the cost and impact of any mitigation strategies, is critical. We cannot understand or support any construction plan without that information. The Port must understand the impacts of the project on its facilities and tenants and the business operations, and the cost and impact of applicable mitigation strategies, to then support the project and be able to participate in its funding.

L-014-062

The text should have referred to fishing on Pier 66. This has been updated in the Final EIS.

L-014-063

As you noted, the letter to Ms. Stenberg repeats and expands upon the points made in this letter to Secretary MacDonald and Mayor Nickels. Please refer to the responses provided above.

L-014-063

The limited information that is currently available indicates that economic impact and mitigation costs to the Port and its tenants could comprise a substantial portion of any Port financial participation in the project.

In addition to introducing changes to design and construction plans, the SDEIS also proposes using available and projected funds to construct a "core project"; project components not contained in that core would be built at a later, as yet unspecified time. The northern portion of the seawall is no longer included in the core project. Yet its failure, and related failures of the mainline rail and Alaskan Way surface, 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.

However that being said, we would like to echo both the Governor's, and the Expert Panel's, comments that it is time to make a decision and move forward with the project, with these issues resolved. The risk, both financial and safety, of not doing so is too great.

Thank you again for the opportunity to participate in this project and comment on this Supplemental Draft Environmental Impact Statement. We are also sending a more detailed, technical set of comments to WSDOT's SEPA Responsible Official, Kate Stenberg. We look forward to continuing work with your project team to define and fund a project that will replace the SR 99 Viaduct and the City's aging seawall.

Sincerely,



Lloyd Hara
Vice President
Port of Seattle Commission

Cc: Kate Stenberg, Alaskan Way Viaduct Environmental Manager, WSDOT
Port of Seattle Commission
Mic Dinsmore, Chief Executive Officer, Port of Seattle



King County
Department of
Natural Resources and Parks
 Director's Office
 King Street Center
 201 South Jackson Street, Suite 700
 Seattle, WA 98104-3855

RECEIVED
 SEP 26 2006

September 22, 2006

Kate Stenberg
 Washington State Department of Transportation
 Environmental Manager
 Alaskan Way Viaduct and Seawall Replacement Project
 999 Third Ave, Suite 2424
 Seattle, WA 98104

Dear Ms. Stenberg:

King County Department of Natural Resources and Parks (DNRP) appreciates the opportunity to comment on the Alaskan Way Viaduct and Seawall Replacement Supplemental Draft Environmental Impact Statement (EIS).

L-015-001 The original Draft EIS described stormwater management options which included a convey-and-treat approach. King County DNRP strongly objected to that approach. In our attached letter dated June 1, 2004, we described the adverse impacts it would have on our wastewater management system and the environment, as well as the regulations prohibiting the approach. While King County staff have been informed in project meetings that the convey-and-treat approach will not be carried forward into the Final EIS, we want to reiterate our objections to it, and endorse again the Best Management Practices approach as a viable and better alternative.

The Supplemental Draft EIS addresses proposed changes to the project that have occurred since the Draft EIS. The following are a few of our comments on the new elements—in particular, comments related to the relocation of the Whatcom rail yard, utility relocations, and coordination on dewatering and stormwater management in the Aurora Avenue area of the project:

L-015-002 1. Impacts to King County pipelines and facilities are not identified under the alternative involving relocation of the Whatcom rail yard to east of SR 99. We would like to see any impacts addressed in the Supplemental Final EIS as we have many critical pipelines and shallow pipes in the area that may need additional protection from the rail traffic.

L-015-001

Your objections to the convey and treat approach are acknowledged, and the approach is not being carried forward in the Final EIS. Please see L-005 for the responses to your 2004 Draft EIS comment letter.

L-015-002

The project area that contains the Whatcom Railyard is now covered under a separate project--S. Holgate Street to S. King Street Viaduct Replacement Project. Please refer to that project's Environmental Assessment and Finding of No Significant Impact (FONSI) for details about project effects.

- L-015-003** | 2. *Appendix S, Water Resources, Exhibit 5.3.1*
This exhibit shows significantly greater impervious area in the Denny, Broad and Dexter Basins, which are connected to the combined system, than was shown in the Draft EIS – from a total of 21.3 to 27.9 acres. A King County combined sewer overflow (CSO), the Dexter CSO, is connected to these basins. It was to be controlled by the Mercer Tunnel, which was part of the recently completed (May 2005) Denny Way/Lake Union CSO Control Project. The Mercer Tunnel also controls the City of Seattle's East Lake Union CSOs and King County's Denny Way CSO. Any increased stormwater in this area may adversely affect the flow balance of this tunnel and the control status of these CSOs in violation of state and federal regulations. The Viaduct project will need to coordinate with King County to identify detention needed to avoid this.
- L-015-004** | 3. *Section 6.1.1, Dewatering*
It is stated that dewatering for construction of the lowered Aurora Avenue project element in the Denny Way/Broad Street Area may be discharged to Lake Union with treatment or discharged to the combined sewer. King County prefers discharge to Lake Union due to the capacity issues around the new Mercer Tunnel, described above.
- L-015-005** | 4. *Appendix K, Relocations, Page 18, Tunnel (preferred)*
The text mentions potential displacement of a Metro utility structure near the western end of South Lander Street. King County has not been made aware of this in our relocation discussions with the project team. Additional information should be provided to King County so we can determine impacts.
- L-015-006** | King County DNRP would like the opportunity to work with the Alaskan Way Viaduct team to provide information on design and operation of King County's wastewater facilities, as well as technical studies of the effects of wastewater and stormwater discharges on water quality and sediments in Elliott Bay.

If you have additional questions please contact Karen Huber, CSO Program Manager, in the Planning and Compliance Section of the Wastewater Treatment Division of the Department of Natural Resources and Parks at 206-684-1246.

Sincerely,



Pam Bissonnette
Director

Enclosure

cc: Ron Paananen, Alaskan Way Viaduct Project Director, Washington State Department of Transportation
Karen Huber, CSO Program Manager, Planning and Compliance Section, Wastewater Treatment Division, Department of Natural Resources and Parks

L-015-003

A detailed land use analysis has been performed for the Final EIS that accurately calculates existing and proposed impervious surfaces within the project limits for each alternative. To the extent possible, stormwater will be managed so that sub-basin boundaries and receiving waters will not change.

L-015-004

Please see Appendix P, Earth Discipline Report; significant dewatering is no longer expected in the North End. Dewatering methods, treatment, and disposal will be determined in the permitting and design phase of the project. We appreciate your comments regarding dewatering treatment options in the north project area. Your preference for discharge of dewatering water to Lake Union will be considered.

L-015-005

The build alternatives would not affect the Metro utility structure near the western end of South Lander Street. Since 2006, the lead agencies have selected the Bored Tunnel Alternative as the preferred alternative. Please refer to Appendix K, Public Services and Utilities Discipline Report, for an updated discussion of potential impacts. Specific impacts and mitigation are being discussed during ongoing coordination between the lead agencies and the utility providers, including King County.

L-015-006

Thank you. King County staff have provided valuable information throughout the project's planning and environmental evaluation.

September 22, 2006

Kate Stenberg, AWV Environmental Manager
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104-4019

Dear Ms. Stenberg:

Supplemental Draft Environmental Impact Statement (SDEIS) for
Alaskan Way Viaduct and Seawall Replacement Project

L-016-001

The Puget Sound Clean Air Agency appreciates this opportunity to comment on the Supplemental DEIS for the Alaskan Way Viaduct and Seawall Replacement Project. These comments are supplemental to our comments on the DEIS. The Agency reiterates its earlier stated position that compliance with state and federal conformity regulations does not constitute compliance with state and federal environmental statutes and regulations. The agency further reiterates that the demolition and construction phases of the project must be conducted with appropriate mitigation that minimizes public health risks for residents, visitors and waterfront business owners, promotes air quality and protects climate.

The Agency reiterates its earlier disappointment that the Hazardous Air Pollutants (HAPs), such as benzene, formaldehyde, and 1,3 – butadiene, have not yet been quantitatively analyzed. Concentration estimates can easily be determined using EPA’s Industrial Source Complex Version 3, (ISC3) model. The final EIS ISC3 modeling should include an analysis of the HAPs. This information would assist decision makers in evaluating the alternatives, refining the preferred design, selecting mitigation measures and protecting public health from cancer-causing pollutants.

Because the project involves equipment not routinely used on highway construction projects, such as barges and soil processing equipment, the Agency wants WSDOT to ensure that emissions from all of the equipment used in demolition and construction are mitigated. Accordingly, in addition to the detailed construction air quality impact assessment committed to in the DEIS Air Quality Discipline Report and the mitigation elements recommended in our DEIS comment letter, we recommend collaboratively developing a construction period air pollution emission control plan. If such a collaborative process was used, WSDOT could commit to a construction mitigation plan concurrent with the conformity determination.

The agency commends WSDOT for proposing the Construction Transportation Management Plan, (CTMP), for mitigating construction period traffic impacts. The CTMP contains strategies that can also provide public health, air quality and climate protection benefits. Accordingly, we recommend that emissions reductions be one of the criteria used to select the strategies of the CTMP. The CTMP has excellent potential to be a pilot program for other construction projects and also to evaluate the effectiveness of the strategies as permanent alternatives to increasingly expensive capital project

L-016-001

A Memorandum of Agreement has been developed between WSDOT and the Puget Sound Clean Air Agency to help eliminate, confine, or reduce fugitive dust during the construction period. State and federal environmental regulations, as well as the air conformity regulations, will be followed. Please see the Final EIS Appendix M, Air Discipline Report, for the current methods used to assess air quality effects for this project and for the effects discussion. Mitigation measures will be in place during the demolition and construction of the project as discussed in Chapter 8 of the Final EIS, and in the Air Discipline Report.

L-016-001

improvements. We recommend that it be implemented in conjunction with the air quality construction mitigation plan recommended above.

In closing, the Agency reiterates its offer to assist WSDOT with the development of a construction air pollution emission control plan and extends the offer of assistance to include the CTMP.

If you have any questions concerning my comments please contact me at 206-689-4085 or paulc@pscleanair.org.

Sincerely,

Paul Carr, Air Resource Specialist

Puget Sound Clean Air Agency

From: [Peter Steinbrueck FAIA](#)
To: [AWV SDEIS Comments](#)
CC:
Subject: Seattle City Councilmember Peter Steinbrueck Comments
Date: Friday, September 22, 2006 4:23:55 PM
Attachments:

Ms. Kate Stenberg
AWV Environmental Manager-AWV Project Office
Wells Fargo Building
999 Third Avenue, Suite 2424
Seattle, WA 98104-4019

Dear Ms. Stenberg:

I am requesting that you analyze and address several matters related to Seattle's waterfront corridor.

L-017-001 Mercer Corridor: Reknit the Street Grid, Following Council Resolution
A reconnected street grid around Aurora Avenue, Mercer, Harrison and Republican is crucial to the vitality of the surrounding neighborhood. This grid carries part of the burden of creating strong pedestrian connections from South Lake Union, through Uptown, into Belltown and down to the Waterfront. Seattle City Council and the Mayor of Seattle signed Resolution Number 30726 in January of 2005 to reknit the street grid. WSDOT should follow this resolution by putting Aurora Avenue below grade while connecting Mercer, Harrison and Republican at the surrounding street grade.

L-017-002 Create a Downtown Park
Seattle needs a central downtown park that draws a cross-section of the community together for conversation and play. WSDOT should identify a space in the center city, South of Pike. One possibility: the surface parking lot between Spring and Seneca, Western and Alaskan, could be used as a viaduct-replacement construction site and later as a park.

Create A Pocket Park; Location: The Old-Viaduct On-Ramp at Columbia.
Removing the Viaduct and its Columbia on-ramp creates an ideal

L-017-001

Your comments supporting the lowering of Aurora Avenue and constructing bridges above the roadway to reconnect some of the local surface streets are noted. The concept of enhancing neighborhood connections across Aurora Avenue has continued to be among the improvements considered as part of the project. Please see the Final EIS for the current configurations proposed for each build alternative for the project area north of the Battery Street Tunnel.

L-017-002

The Alaskan Way Viaduct Replacement Project does not include specific plans for new park and recreation facilities or specific waterfront amenities because the purpose for the project is to provide a replacement transportation facility that meets current seismic standards and improves traffic safety, among other things.

The City of Seattle is leading the Central Waterfront Project to redevelop the waterfront. The exact configuration and types of activities on the waterfront will be decided during the planning and design process for that project. There will be opportunities for the public to participate in that master planning effort and to determine the future of their waterfront.

L-017-002 opportunity to create a connection from the downtown core to the water. WSDOT should study making Columbia from First Ave to the water a pedestrian-only corridor. Further, it should study creating a pocket park on the existing viaduct land and the surface parking lot at Western and Columbia as a possible option.

L-017-003 Remove Autos Queued for the Ferry on Alaskan Way
Building additional lanes on Alaskan Way or other streets near the waterfront for the ferry will disrupt pedestrian and bicycle traffic on the waterfront.

L-017-004 Create People Space on the Northern Tunnel Portal
WSDOT could lid the entire gulch created by the highway exiting on the north end of the tunnel. That lid could minimize the pedestrian impact of the exiting cars and travel from Pike Street to the Battery Street Tunnel.

If you have any questions about my comments, please contact my office. Thank you for your consideration of these important matters.

Sincerely,
Councilmember Peter Steinbrueck, FAIA
Chair, Urban Development and Planning Committee
Seattle City Council
600 Fourth Avenue, Floor 2
PO Box 34025
Seattle, WA 98124
(206) 684-8804
<http://www.seattle.gov/council/steinbrueck/>

L-017-003

The build alternatives have been refined since the 2006 Supplemental Draft EIS, and neither the Cut-and-Cover Tunnel Alternative nor the Elevated Structure Alternative include ferry queuing on Alaskan Way. The preferred Bored Tunnel Alternative does not include the Alaskan Way surface street as part of the project. The final design of the waterfront will be determined by the Central Waterfront Project being led by the City of Seattle and will be coordinated with Washington State Ferries.

L-017-004

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel Alternative and evaluated in the 2006 Supplemental Draft EIS. It was included in the project, due in part to numerous 2004 Draft EIS public comments requesting the lead agencies to consider a lid in the Pike Place/Belltown area. The proposed lid would extend north from where SR 99 emerges from the tunnel's north portal near Pine Street to Victor Steinbrueck Park near Virginia Street. The design for this lid structure with the current Cut-and-Cover Alternative is described in this Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.



Seattle City Council

September 21, 2006

Ms. Kate Stenberg
AWV Environmental Manager
AWV Project Office
999 Third Avenue, Suite 2424
Seattle, Washington 98104

Dear Ms. Stenberg:

L-018-001

The position of the majority of the Seattle City Council (7 of 9 members) regarding the Alaskan Way corridor is that all through-Seattle traffic should travel underground from Atlantic Street to Roy Street and that Alaskan Way should receive no net gain in width or roadway.

In January 2005, the Seattle City Council passed and Mayor Greg Nickels signed Resolution 30726 declaring the Tunnel Option as the City's Preferred Alternative for replacement of the Alaskan Way Viaduct/Seawall Project (the Project) and expressing preferences for the design and development of the project. We ask that, as you further study the opportunities for the waterfront, you also analyze and address the following considerations addressed in this resolution:

L-018-002

1. **North End - Battery Street Tunnel to Highland Drive** - One element of this resolution states our preference that SR99 (Aurora Avenue) be rebuilt below the surrounding street grade between the north end of the Battery Street Tunnel and approximately Highland Drive and that Mercer, Republican and Harrison Streets be constructed to cross SR99 at the surrounding street grade to reconnect the street grid and reconnect South Lake Union to lower Queen Anne.

Allowing the street grid to be reconnected would strengthen connections to the South Lake Union, Uptown/Queen Anne, Belltown and Waterfront neighborhoods. It would also be a solution to the decades-long Mercer Street problem that is part of a tangle of roads weaving through the South Lake Union neighborhood providing access from I-5 to the Seattle Center.

This area has experienced transportation and community development challenges including backed-up surface roads and freeway off-ramps with an especially unsafe weaving pattern for cars exiting I-5; difficult circulation within the neighborhood, particularly for freight; unsafe and unpleasant bicycle and pedestrian movements; a barrier to South Lake Union Park and other lake front attractions; and a confusing route to navigate to the Seattle Center, which is a major regional destination.

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L-018-001

FHWA, WSDOT, and the City of Seattle recognize that the Seattle City Council voted the Tunnel Alternative to be their preferred alternative in January 2005. However, after the 2006 Supplemental Draft EIS was published, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2006, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2006 Supplemental Draft EIS, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to identify the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront.

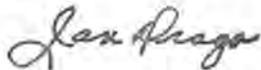
L-018-002

The lead agencies appreciate receiving your comments supporting the lowering of Aurora Avenue and constructing bridges above the roadway to reconnect some of the local surface streets. The concept of enhancing neighborhood connections across Aurora Avenue has continued to be among the improvements being considered as part of the project. See

- L-018-002** | WSDOT has previously sanctioned this design. We believe that maintaining this design is vital to the health of the adjacent neighborhoods, as well as the Alaskan Way Viaduct and Mercer Street replacement projects.
- L-018-003** | 2. **North lid** - A lid should be constructed above the highway from Pike Street to the Battery Street Tunnel and across the entire width of the gulch that is created by the highway. We also support the plan to have the highway travel under Elliott and Western Avenues.
- L-018-004** | 3. **Southern tunnel portal** - Analysis should be done toward moving the southern portal of the tunnel to a point south of Atlantic Street.
- L-018-005** | 4. **South lid** - A lid should be constructed over the highway from King Street, south to Royal Brougham creating space for parks and mixed use buildings on top of the traffic.
- L-018-006** | 5. **No net increase in speed on Alaskan Way** - The speed limit on Alaskan Way should be no more than 30 mph. Traffic lights should be set to move traffic between 22 and 28 mph, in accordance with other downtown avenues.
- L-018-007** | 6. **No ferry queuing on Alaskan Way** - No additional lanes should be constructed on Alaskan Way or any other pedestrian or traffic-oriented street near the waterfront.
- L-018-008** | 7. **One great downtown park** - Analysis should be done to identify a space for a large, center city park, located south of Pike. Consideration should be given to acquisition of the surface parking lot located between Spring and Seneca, Western and Alaskan Way, as a potential highway construction site and subsequent city park.

L-018-009 | In conclusion, we recognize that the major landowners along the waterfront are each public entities, holding the land in the public trust. We call upon WSDOT, the Port of Seattle and the Department of Natural Resources to work cooperatively with the City of Seattle, as well as to value and consider the quality of life aspects of our new waterfront.

Sincerely,



Councilmember Jan Drago
Chair, Transportation Committee



Councilmember Jean Godden
Member, Transportation Committee

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the Final EIS for the current configuration of each proposed build alternative north of the Battery Street Tunnel.

L-018-003

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel Alternative and evaluated in the 2006 Supplemental Draft EIS. It was included in the project, due in part to numerous 2004 Draft EIS public comments requesting the lead agencies to consider a lid in the Pike Place/Belltown area. The proposed lid would extend north from where SR 99 emerges from the tunnel's north portal near Pine Street to Victor Steinbrueck Park near Virginia Street. The design for this lid structure with the current Cut-and-Cover Alternative is described in this Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.

L-018-004

The south portal location has been analyzed by the design team for the preferred alternative, which is the Bored Tunnel Alternative, and the Cut-and-Cover Tunnel Alternative. The configuration of the tunnel requires that on- and off-ramps access the tunnel from the tunnel portals. Moving the tunnel portal south would force the on- and off-ramps into the existing railyards. This option is not feasible given the current rail operations and rail traffic.

L-018-005

A lid over SR 99 from King Street to S. Royal Brougham Way was not proposed as it would be cost-prohibitive and would not increase pedestrian connections between pedestrian activity areas. The addition of a lid would essentially extend the tunnel and would require similar support facilities for ventilation, fire suppression, and emergency egress. This structure would have similar costs per linear foot as the tunnel. In addition, because the area in question is bordered to the west

by the Port of Seattle's marine container operations, a pedestrian lid would not link the stadium areas to a destination.

L-018-006

The speed limit along the Alaskan Way surface street is currently 30 mph, the standard speed limit for arterial streets in the City of Seattle. The Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure Alternatives, the three build alternatives carried forward to the Final EIS, do not propose to change the speed limit along the Alaskan Way surface street. Traffic signals on Alaskan Way for the Cut-and-Cover Tunnel and Elevated Structure Alternatives would be designed to help facilitate safe and efficient traffic flow along the corridor. The Bored Tunnel Alternative does not include the Alaskan Way surface street as part of the project.

L-018-007

The build alternatives have been refined since the 2006 Supplemental Draft EIS, and neither the Cut-and-Cover Tunnel Alternative nor the Elevated Structure Alternative include ferry queuing on Alaskan Way. The preferred Bored Tunnel Alternative does not include the Alaskan Way surface street as part of the project. The final design of the waterfront will be determined by the Central Waterfront Project being led by the City of Seattle and will be coordinated with Washington State Ferries.

L-018-008

The Alaskan Way Viaduct Replacement Project does not include specific plans for new park and recreation facilities or specific waterfront amenities because the purpose for the project is to provide a replacement transportation facility that meets current seismic standards and improves traffic safety, among other things.

The City of Seattle is leading the Central Waterfront Project to redevelop

the waterfront. The exact configuration and types of activities on the waterfront will be decided during the planning and design process for that project. There will be opportunities for the public to participate in that master planning effort and to determine the future of their waterfront.

L-018-009

The lead agencies, including the City of Seattle, have worked cooperatively and collaboratively with the major landowners along the city's waterfront since the beginning of the project. The Port of Seattle and the Department of Natural Resources, along with many other local and state agencies have been included continuously in meetings and planning discussions with the lead agencies and staff, and will continue to do so, as the final project design is completed.



MUCKLESHOOT INDIAN TRIBE

Fisheries Division

39015 - 172nd Avenue SE • Auburn, Washington 98092-9763
Phone: (253) 939-3311 • Fax: (253) 931-0752



June 1, 2004

Ms. Allison Ray
WSDOT Environmental Coordinator
AWV Office
999 Third Ave, Suite 2424
Seattle, WA 98104

Re: Comments on the SR 99: Alaskan Way Viaduct & Seawall Replacement Project Draft Environmental Impact Statement (FHWA-WA-EIS-04-01-D)

Dear Ms. Ray:

The Muckleshoot Indian Tribe Fisheries Division has had an opportunity to conduct an initial review of the Alaska Way Viaduct & Seawall Replacement Project (AWV) Draft Environmental Impact Statement (DEIS). This project occurs within the Usual and Accustomed Fishing Grounds of the Tribe. Although we will continue to review the information presented in this draft document, we wanted to provide you the following general technical comments at this time.

- T-001-001** The Fisheries Division is concerned about the proposal to include an over-water structure between Colman Dock and Pier 48. An over-water structure is proposed in all of the AWV replacement alternatives. The construction of a new over-water structure or the filling of aquatic habitat presents the potential to adversely affect Tribal fisheries in the area as well as further degrade habitat for a variety of fish and other aquatic species. Of particular additional concern is the fact that there does not seem to be a justification for this over-water structure as part of the Alaska Way Viaduct & Seawall Replacement Project. In addition, the DEIS should discuss specific mitigation proposals to compensate for unavoidable impacts. The general statements about the mitigation proposals that are still in development make it impossible to compare and contrast the relative environmental impacts of the different alternatives, even if an over-water structure was justified. For example, the document states that Pier 48 may be removed, but does not state whether it would be part of a mitigation package or not.
- T-001-002**

Thank you for the opportunity to comment on this DEIS. If you have any additional questions or would like to discuss these comments further, please contact me at (253) 876-3130 or glen.stamant@muckleshoot.nsn.us.

Sincerely,

Glen R. St. Amant
Muckleshoot Fisheries Division

T-001-001

The lead agencies are aware of the Tribe's fishing rights in this area and will work with you to avoid or minimize any adverse effects. The temporary overwater structure would be needed for either the Cut-and-Cover Tunnel or Elevated Structure Alternatives to maintain access to Colman Dock while the seawall and other nearby structures are under construction. As part of the State Highway System and a critical link the regional transportation network, ferry service must be continued throughout construction. The temporary structure between Pier 48 and Colman Dock will be removed before the end of construction. The temporary overwater structure is not required for the preferred Bored Tunnel Alternative.

T-001-002

This Final EIS describes mitigation for many project impacts and identifies those impacts which cannot be avoided. The preferred Bored Tunnel Alternative does not require any in-water work. For either the Cut-and-Cover Tunnel or Elevated Structure Alternatives, a portion of the overwater structure of Pier 48 would be removed prior to construction of the temporary structure connecting the upland portion of Pier 48 with Colman Dock. This would mitigate the temporary increase in overwater coverage.



FISHERIES DEPARTMENT
360/598-3311
Fax 360/598-4666

THE SUQUAMISH TRIBE
P.O. Box 498 Suquamish, Washington 98392

1 June 2004

Allison Ray
WSDOT
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

Subject: Comments on the Draft Environmental Impact Statement for the Alaskan Way Viaduct and Seawall Replacement Project

VIA EMAIL

Dear Ms. Ray:

The natural resources of the Seattle waterfront area and Elliott Bay have supported the culture, economy, and welfare of the Suquamish Tribe for many generations. The marine resources of Elliott Bay are trust resources belonging to the Tribe since time immemorial. The Tribe's rights to these resources, and their management, were retained by the Tribe when this area was ceded to the U.S. Government in the Treaty of Point Elliott. The above referenced proposal has the potential to add additional adverse impacts to an already significantly degraded environment with consequent affects on the Tribe's trust resources. The Tribe therefore welcomes the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for this proposed project.

Intertidal habitat

The Tribe supports the construction of the new seawall landward of existing seawall structures as proposed in each of the build alternatives and agrees that this will, in 4 of the 5 build alternatives, produce marginal increases in the total area of intertidal habitat in Elliott Bay. However, the addition of over-water coverage resulting from such features as cantilevered sidewalks and the extension of Coleman Dock to Pier 48 offsets much of this benefit. In particular, shading from additional over-water structures will reduce primary productivity and likely will affect the behavior of juvenile salmonids making them more susceptible to predation. The DEIS correctly recognizes that unshaded intertidal habitats are scarce along the Seattle waterfront. The Suquamish Tribe believes more should be done on this project to restore this habitat type.

T-002-001

T-002-001

Since 2004, the project has evolved, and the preferred Bored Tunnel Alternative does not require any in-water work. The seawall would be replaced by a separate project led by the City of Seattle.

The Cut-and-Cover Tunnel and Elevated Structure Alternatives would include constructing a new seawall. The cantilevered sidewalks included with the new seawall under these alternatives currently exist along the Seattle waterfront. Due to their narrow profile, height, and the west to southwest orientation of the seawall they cast very little or no shadow on the intertidal area, depending on time of day and season. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would construct the new seawall at or landward of the existing seawall. This would slightly increase the area and volume of shallow water nearshore habitat in the project area.

The overwater extension between Pier 48 and Colman Dock has been deleted from the project, although the temporary access bridge between these piers remains part of construction for the Cut-and-Cover Tunnel and Elevated Structure Alternatives. Discussion of the potential shading effects of this bridge are provided in the Final EIS and Appendix N, Wildlife, Fish, and Vegetation Discipline Report.

T-002-002

Stormwater and CSO outfalls

The proposal calls for stormwater and CSO outfalls at the edge of the new seawall. Stormwater and CSOs convey a range of pollutants including metals, organics, nutrients, and bacterial contaminants. Whereas the Tribe welcomes the expressed commitment to water quality treatment BMPs, the lack of space in the Seattle waterfront area limits treatment alternatives. The Tribe believes that water quality impacts resulting from this project can be further mitigated by extending all new and existing stormwater and CSO outfalls beyond the nearshore environment and into the deep subtidal area of Elliott Bay where better mixing and dispersion are possible.

T-002-003

Construction and impacts on fishing

The proposal calls for the use of barges and other marine vessels during construction. Vessel traffic (including ferries, recreational boats, tour boats, container ships, cruise ships, etc.) in Elliott Bay has increased in volume in recent decades. The Suquamish Tribe conducts a variety of fisheries in proximity to the project area. The current volume of vessel traffic makes fishing extremely difficult and dangerous. The proposed project would add to this traffic during a lengthy construction period. This impact on the Tribe's ability to safely and effectively conduct treaty-protected fisheries was not considered or analyzed in the DEIS. WSDOT should consult directly with affected Tribes on the potential for vessel conflict with Tribal fishing and methods for mitigating such conflicts.

T-002-004

Cultural Resources

The Tribe generally concurs with the conclusions regarding potential impacts on archeological resources. The Tribe expects continued consultation with WSDOT as the treatment and monitoring plans called for in the DEIS are developed.

Thank you for this opportunity to comment on the proposed Viaduct and Seawall Replacement Project. The Tribe will continue to comment as the project progresses. We look forward to future discussions with you on this important project and ways to avoid and minimize impacts on the Tribe's resources.

Sincerely,

Tom Ostrom
Environmental Program

T-002-002

Please note the preferred Bored Tunnel Alternative does not include replacing the Elliott Bay Seawall. That is now a separate project led by the City of Seattle. For the Cut-and-Cover Tunnel and Elevated Structure Alternatives, which include replacing the seawall, the outfalls will be replaced in-kind at the same locations and depths, to minimize in-water work activities and disturbance of potentially-contaminated sediments in the nearshore environment.

T-002-003

The project team recognizes the legitimate concern of the Tribe for potential interference with fishing conducted by the Tribe in Elliott Bay. Any vessel movements associated with construction would be mostly in the immediate vicinity of the Terminal 46, with occasional transit across the open water of Elliott Bay. FHWA, WSDOT, and the City of Seattle will continue to coordinate and consult with the Suquamish Tribe to minimize conflicts between construction vessel movements and tribal fishing activities and to develop mitigation as appropriate.

T-002-004

Regular consultation has continued through the development of the 2006 and 2010 Supplemental Draft EISs. Consultation is currently in process with regards to resolution of adverse effects of the Bored Tunnel Alternative presented in the 2010 Supplemental Draft EIS. This consultation will result in the development of a Memorandum of Agreement (MOA). The MOA will include provisions for the creation of a historic properties treatment plan for the data recovery, evaluation, and monitoring of archaeological resources. In addition, the MOA will also result in the creation of an Unanticipated Discovery Plan for the treatment of unanticipated archaeological resources or human remains that are discovered during construction. The Suquamish have been one of the tribes that have been consulted throughout this process.



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May 26, 2004

RECEIVED
 JUN 01 2004
 AWWSP Team Office

Ms. Allison Ray
 AWW Project Office (Wells Fargo Building)
 999 Third Avenue, Suite 2424
 Seattle, Washington 98104

Dear Ms. Ray:

Thank you for the opportunity to comment on the Alaskan Way Viaduct and Seawall Replacement Project Draft Environmental Impact Statement.

The Alaskan Way Viaduct and Seawall Replacement Project is the single most important transportation project in the State of Washington. Only the SR-520 Bridge approaches the viaduct in the danger it poses to the safety of the Central Puget Sound region's residents and the health of our state's economy. Therefore, replacing the viaduct in a timely manner is the top priority of the Greater Seattle Chamber of Commerce and should have first call on state and regional investments in our transportation infrastructure.

Replacing the viaduct also presents us with tremendous economic development potential. The opportunity to replace an aging, unsafe structure and at the same time open up the waterfront to the central business district should not be missed, if we can realistically achieve such a goal.

The Greater Seattle Chamber of Commerce supports replacing the Alaskan Way Viaduct with a tunnel, as outlined in the DEIS.

The benefits of the tunnel option are numerous, including the following:

Economic Development

The economic development potential of the tunnel option is far greater than any similar potential in the other options outlined in the DEIS. The central waterfront is currently underutilized in comparison to those of other major seaport cities. By reconnecting our region to the Central Waterfront and opening up dozens of acres for redevelopment, open space and view corridors we will allow for numerous creative opportunities to make Seattle and the Puget Sound region a more vibrant, attractive place for business.

The Final EIS should include a quantitative and qualitative report on the economic development benefits of the tunnel option.

Construction Impacts

The tunnel option consists in actuality of two separate tunnels – one under the footprint of the current viaduct and one immediately west of it. The western tunnel can be built and begin receiving traffic prior to demolition of the viaduct. Therefore, the tunnel option allows for the least disruption to the SR-99

A thriving region in a competitive world

C-001-001

C-001-002

C-001-003

C-001-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

C-001-002

The Final EIS includes a qualitative economic analysis for all of the alternatives that more fully describes indirect benefits. Quantitative estimates of indirect benefits are not needed to understand the likely effects of the project in the context of the decision at hand.

C-001-003

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each

C-001-003	<p>corridor, and consequently to both the I-5 and I-405 corridors as well, during demolition of the viaduct and construction of the eastern tunnel. No other option in the DEIS allows for as little disruption to usage of our region's current transportation system.</p>
C-001-004	<p>Efficiencies with Seawall Construction By combining replacement of a portion of the Seawall with the western wall of the tunnel, we can capitalize on efficiencies, getting both elements of the project for considerably less than it would cost to build a tunnel and a seawall independent of one another.</p> <p>Support for the tunnel option is not unqualified, however. Among our concerns are the following:</p>
C-001-005	<p>Freight Mobility The ability of industrial and manufacturing businesses to transport freight of all kinds between Ballard and the industrial areas south of downtown – as well as the ability to use the SR-99 corridor to move freight through Seattle to and from other parts of the region – must be preserved. Specifically, the ability to transport hazardous and flammable materials through any tunnel that is ultimately built must not diminish from current levels on the existing viaduct.</p>
C-001-006	<p>Funding Any realistic option to replace the viaduct will cost at least \$3.1 billion, with most of the alternatives studied in the EIS in the \$3.2 billion to \$3.5 billion range. Building a tunnel is estimated to cost \$3.8 billion to \$4.1 billion, representing an incremental change of between \$300 million and \$900 million. Innovative financing must be implemented to meet this incremental need. Capitalizing on the value that the removal of the Alaskan Way Viaduct will create throughout downtown Seattle must be a part of any funding plan for building a tunnel. Realistic options include a Local Improvement District or Tax Increment Financing (TIF), if TIF is ever allowed in the State of Washington.</p>
C-001-007	<p>Capacity Losing capacity in the SR-99 corridor cannot be an option in the planning process. The 122,000 vehicle capacity in the tunnel and 21,000 vehicle capacity along Alaskan Way, as outlined in the DEIS, are both encouraging figures. This level of capacity must be maintained as the project is engineered and constructed.</p>
C-001-008	<p>Commitment to the Entire Project Because the tunnel option is the most expensive among those explored in the DEIS, it runs the greatest risk of failing to be fully funded. The Chamber is concerned that work on northern or southern elements of the SR-99 corridor could be more expensive than anticipated, leaving too few resources to complete the tunnel. In such a situation, the risk exists that we will be left with the ability to only complete a surface option or a modified aerial structure, both of which are far inferior to a tunnel. Therefore it is vital that the southern portion of the corridor and the central waterfront portion be built concurrently as a single project, with a commitment to funding the entire project to completion.</p>

alternative and its construction plan, and Chapter 6 describes construction effects.

C-001-004

Thank you for your consideration of how the seawall integrates with the alternatives. Since 2004, the project has evolved. Please see the Final EIS for current information on the alternatives. For the Cut-and-Cover Tunnel Alternative, constructing one wall that would serve as both the new seawall and west wall of the tunnel along the central waterfront could help to make the construction staging and costs of that piece of the project more efficient. For the preferred Bored Tunnel Alternative, the seawall would be a separate project. For the Elevated Structure Alternative, the seawall would need to be replaced as part of the project, because a new elevated structure on the existing alignment requires the geotechnical stabilization afforded by a new seawall.

C-001-005

Current access to and from SR 99 between Ballard and the industrial areas south of downtown would change under the preferred Bored Tunnel Alternative. This alternative would remove connections via the Elliott and Western Avenue on- and off-ramps. Freight operators traveling from Ballard, Interbay, and Magnolia could make their trip by either (1) traveling on Elliott Avenue and Alaskan Way (via Broad Street) to SR 99 ramps at Alaskan Way S., or (2) traveling on Mercer Street to the SR 99 ramp at Sixth Avenue N. and Republican Street.

This project recognizes the importance of preserving routes for the transport of hazardous and flammable materials. Please note that transport of these materials through the Battery Street Tunnel is currently prohibited. Additionally, transport of these materials on the Viaduct is prohibited during peak commute periods. Alternate routes are provided on Alaskan Way and on I-5.

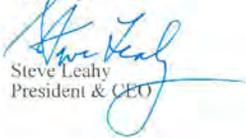
C-001-009 **Security**
Because the western wall of the tunnel will also serve as the seawall, the seawall will appear to be more vulnerable to acts of malice than was previously the case. Such acts could therefore put the central business district in jeopardy of a seawall collapse. Preventative measures must be taken in order to secure the safety of everyone in the waterfront area and throughout the core business district.

C-001-010 **North Terminus**
The DEIS identifies three options for improving the East-West connections immediately North of the Battery Street Tunnel. If the incremental costs of this alternative can be covered by sources outside of the Viaduct project the lowered Aurora alternative appears to be the superior choice. This alternative provides the best opportunity for reconnecting the street grid, thereby knitting back together the South Lake Union and Lower Queen Anne neighborhoods and improving traffic flow on the Mercer corridor, without disrupting the flow of traffic on the Alaska Way Viaduct.

The Greater Seattle Chamber of Commerce will monitor progress on this vital transportation project and reserves the right to further comment or change its position as events unfold.

Again, thank you for the opportunity to comment on this important Draft EIS. The Chamber looks forward to working with the project proponents to improve this vital transportation corridor.

Sincerely,


Steve Leahy
President & CEO

While the ventilation system for the Bored Tunnel Alternative is being designed for a fire with a heat release rate of approximately 100 MW (a category of fire typically associated with a 4,000-gallon tanker truck with hydrocarbon fuel), flammable and hazardous materials will be prohibited in the new tunnel. This cargo would have to use one of the alternate routes identified above, just as they do today if they would otherwise travel through the Battery Street Tunnel or during peak periods.

C-001-006

WSDOT has authorization from the state legislature for \$2.8 billion to replace the Alaskan Way Viaduct. This does not involve or require a local improvement district or tax increment financing. The City of Seattle is leading improvements to the Central Waterfront, including Alaskan Way. The City may consider a variety of funding mechanisms for these improvement.

C-001-007

The alternatives considered in the Final EIS provide sufficient vehicle capacity in the project corridor. The Final EIS and Appendix C, Transportation Discipline Report, provide updated transportation information for each alternative.

C-001-008

All components of the preferred Bored Tunnel Alternative are fully funded by federal, state, and local sources. The state legislature has not addressed funding for either the Cut-and-Cover Tunnel or the Elevated Structure Alternatives. Cost estimates for the alternatives evaluated in the Final EIS are:

- Bored Tunnel – \$1.96 billion
- Cut-and-Cover Tunnel – \$3.0 to \$3.6 billion
- Elevated Structure – \$1.9 to \$2.4 billion

These cost estimates do include different elements. The Bored Tunnel Alternative cost does not include replacing the seawall, improving the Alaskan Way surface street, or building a streetcar. Costs for the Cut-and Cover Tunnel and Elevated Structure Alternatives do not include replacing the seawall between Union and Broad Streets.

C-001-009

For the Cut-and-Cover Tunnel Alternative, appropriate security and safety measures would be used to ensure the safety of the waterfront. With the preferred Bored Tunnel Alternative, the seawall would be a separate project led by the City of Seattle. Security measures for the Bored Tunnel Alternative have been discussed and design considerations have been evaluated.

C-001-010

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. After the 2004 Draft EIS was published, your comments along with others led to additional planning, analysis, and the revised alternatives presented in the 2006 Supplemental Draft EIS. Following publication of the 2006 Supplemental Draft EIS, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the

central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2004 Draft and 2006 Supplemental Draft EISs, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to identify the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront. None of the three alternatives included in the Final EIS include the lowered Aurora concept. However, John, Thomas, and Harrison Streets would connect across Aurora Avenue with the Bored Tunnel Alternative and improve the neighborhood connections.



Downtown Seattle Association

RECEIVED
JUN 01 2004
AWSP Team Office

Alaskan Way Viaduct Replacement Project

June 1, 2004

Allison Ray
AWV Project Office
999 Third Avenue, Suite 2424
Seattle, Washington 98104

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Alaskan Way Viaduct. Note that the Downtown Seattle Association is on record as supporting the Six-Lane Tunnel alternative, as we strongly believe this alternative will provide the greatest long-term benefit for Seattle and the best return on investment. The DSA encourages the State and City to adopt this option as the preferred alternative.

Our specific comments on the information in the DEIS are below.

Comments on the Six Lane Tunnel Option Analysis

1. Further analysis is needed on the issue of hazardous material transport from the Ballard industrial areas to the Port and railroad yards in south Downtown, including capacity needed, tunnel constraints and alternative routes.
2. The current configuration has traffic emerging from the tunnel adjacent to the Pike Place Market and Victor Steinbrueck Park. We encourage the team to explore options to extend the covered portion of the tunnel for the Viaduct roadway in this location to improve east west access to the waterfront.
3. East-west pedestrian access from Pioneer Square and the stadium areas to the Puget Sound is critical. More analysis of options that facilitate this access is needed, especially in the tunnel options, which seem to imply a wall between the stadium area and the Puget Sound.
4. Access to the Viaduct from Downtown needs more analysis and clarification; there are concerns about the impacts of the additional traffic to Pioneer Square and Belltown.
5. The exit and entrance ramps to Elliott and Western are preferable to the ramps at Stewart Street shown in the DEIS, as they would support greater freight mobility. However, analysis of impacts to the Belltown neighborhood needs to be completed.
6. We support keeping Alaskan Way at a maximum of two lanes each way to provide opportunity to create a pedestrian priority environment along the waterfront.
7. We request that the EIS include the option of shifting Alaskan Way traffic east towards the existing buildings in order to provide a pedestrian

C-002-001

C-002-002

C-002-003

C-002-004

C-002-005

C-002-006

C-002-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

C-002-002

Currently, transporting hazardous materials is prohibited at all times in the Battery Street Tunnel, and during peak periods on the viaduct. This would continue to be the case under the Elevated Structure Alternative. Transporting flammable or hazardous materials would be prohibited in the tunnel for the preferred Bored Tunnel Alternative and the Cut-and-Cover Tunnel Alternative. Operators hauling these types of materials would need to use I-5 or Alaskan Way.

C-002-003

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel Alternative and evaluated in the 2006 Supplemental Draft EIS. It was included in the project due in part to numerous 2004 Draft EIS public comments requesting the lead agencies to consider a lid in the Pike Place/Belltown area. The proposed lid would extend north from where SR 99 emerges from the tunnel's north portal near Pine Street to Victor Steinbrueck Park near Virginia Street. The design for this lid structure with the current Cut-and-Cover Alternative is described in this Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.

C-002-006

boulevard along the water and potential development sites for small mixed-use buildings.

C-002-007

- 8. We support the interchange connecting SR 519 and SR 99 at Atlantic Street and Royal Brougham Way.

C-002-008

Construction Impacts

- 1. We believe it is important to provide an opportunity for the community to compare the impacts of a shorter construction schedule with limited access and a longer schedule with two lanes of access (the option shown in the DEIS). Therefore, we request that the EIS contain an option that analyzes ways to shorten the construction schedule.

C-002-009

- 2. The transportation improvements and strategies being developed to cope with a sudden and catastrophic loss of the Viaduct should be factored into the access and capacity assumptions for the alternatives. Could some of the improvements that would be made to I 5 and other transportation networks to cope with a sudden loss of the Viaduct be integrated into the Viaduct project, and would they reduce the number of lanes needed on Highway 99 in the central waterfront?

C-002-010

Flexible Transportation Package

- 1. The DEIS mentions a range of transit mitigation options in the Flexible Transportation Package. We are concerned that 7 to 11 years of reduced access will make Downtown a less desirable place to live and work. This will not only threaten Downtown's economic development, but could impact our ability to reach regional growth management targets. We feel that this project is an opportunity to permanently improve the non-SOV options for access to Downtown. We would like to see the plan directly address mode shift targets needed in order to both mitigate construction impacts and increase the proportion of non-SOV trips to Downtown.
- 2. We support the commitment to provide funding for increased transit options and for personalized business assistance. We encourage the mitigation package to emphasize direct services to businesses; small businesses need one-on-one assistance to learn about and adopt new transit solutions.
- 3. We strongly support the management and monitoring provisions built into the Package; it is very important to measure the usage of and satisfaction with the options.

C-002-011

Business Impacts

- 1. The DEIS mentions low interest loan packages, but experience in Seattle after the earthquake and in other places suggests that loans only work

C-002-004

Please see the updated pedestrian facility descriptions in the Final EIS. East-west pedestrian access across SR 99 would be provided at S. Atlantic Street and S. Dearborn Street. From S. King Street northward, east-west connections would be similar to today's. In addition, pedestrian facilities adjacent to both sides of SR 99 in the Stadium area would be improved compared to existing conditions. With the Bored Tunnel Alternative, SR 99 would be underground by S. Dearborn Street, improving the pedestrian environment at S. Dearborn Street and northward.

C-002-005

Updated Stadium ramp configurations are described in the Final EIS. Analysis of traffic patterns for vehicles accessing ramps to and from SR 99 in the stadium area show that vehicles will disperse on to a variety of streets in the area such as S. Royal Brougham Way, Alaskan Way, First Avenue, Fourth Avenue, etc. Included within the discipline report are a variety of metrics looked at roadway and intersection performance. These analyses were performed with analytical tools using data for a range of modes including pedestrians, trucks, transit, ferries and automobiles.

The Elliott/Western ramps are included in the Cut-and-Cover Tunnel and Elevated Structure Alternatives but are removed in the Bored Tunnel (Preferred Alternative). Please refer to Appendix C, Transportation Discipline Report, of the Final EIS for traffic analysis in both the Belltown and Pioneer Square neighborhood areas.

C-002-006

The City of Seattle is leading the project for the Alaskan Way Surface Street Improvements and its associated environmental review process, which would take place under NEPA and/or SEPA as appropriate. This project involves rebuilding and improving Alaskan Way between S. King

C-002-011

when the business has the potential for increased sales that would make it possible to pay back the loan. The extended construction period of this project suggests that this may not be the case for businesses impacted by the AWV project. (It would be useful to research Boston's experience in this area.) The mitigation plan should consider other options such as temporary relocation, funds for individual business and neighborhood marketing, and consulting help to develop new business strategies, such as Internet sales.

2. The mitigation plan briefly mentions marketing and communications, (we assume the Downtown Services Association mentioned in section 3.1.8 was intended to be the Downtown Seattle Association) but we suggest a much stronger emphasis on this component. An integrated, comprehensive, aggressive PR and marketing campaign will be needed to keep the public informed and willing to come Downtown.

Thank you for the opportunity to respond, and we look forward to working with you on this project.

Sincerely,



Kate Joncas
President

Street and Pine Street. The new surface street would be six lanes wide between S. King and Columbia Streets (not including turn lanes) and four lanes between Marion and Pike Streets. Generally, the new street would be located east of the existing Alaskan Way surface street where the viaduct is today to create a wider public space along the waterfront.

C-002-007

The stadium area interchange connecting S. Atlantic Street and S. Royal Brougham Way to SR 99 is now under construction, but it is now known as the S. Holgate Street to S. King Street Viaduct Replacement Project.

C-002-008

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

C-002-009

The number of lanes proposed along the Alaskan Way Viaduct with the

build alternatives were select based on the projected demand as well as the capacity of connecting segments and roadways. This is to ensure that the new segment doesn't introduce a new bottleneck into the corridor, or conversely, doesn't provide excess capacity that couldn't be used effectively. Improvements to I-5 and other corridors have been studied as part of construction transportation planning and through other efforts, but cost-effective solutions on these corridors that could accommodate projected growth and some share of the SR 99 traffic over the long term have not been identified.

C-002-010

Thank you for your comment regarding the Flexible Transportation Package (FTP). Since the Draft EIS was published in 2004, the FTP has been further developed as part of the project's construction transportation planning process (though the name FTP is no longer being used). The Final EIS details a proposed set of actions aimed at managing mobility and reducing travel impacts associated with construction of the Alaskan Way Viaduct Replacement Project. These actions are intended to help transit operate efficiently given increased general-purpose traffic in the downtown Seattle area during construction. These actions should improve transit access through downtown Seattle and minimize the effect of peak period traffic congestion for transit passengers and operators.

C-002-011

Along with the project, the mitigation measures being considered have evolved since 2004 and no longer consider low-interest loan packages. Chapter 8 of the Final EIS and Appendix L, Economics Discipline Report, describes mitigation measures for the project in detail. The mitigation measures for the build alternatives have common themes:

- Focusing on clearly defining and directing pedestrian and vehicle traffic in a systematic and streamlined manner
- Providing adequate parking for construction workers and

encouraging short-term parking along the waterfront

- Distributing timely and informative project and construction updates
- Providing noise mitigation
- Preparing and assisting businesses within the project area to maintain an accessible and profitable business



RECEIVED
JUN 18 2004
AWSP Team Office

May 27, 2004

Allison Ray
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104
206-882-5287

RE: Comment on Draft EIS

Dear Ms. Ray,

The Pioneer Square Community Association (PSCA), which represents over 700 businesses, residents, and property owners in the Pioneer Square neighborhood, submits this response to the Viaduct draft EIS.

Our response will focus on three key areas:

- What option does the Pioneer Square community prefer?
- What neighborhood mitigation efforts should occur in association with this project?
- How should Pioneer Square relate to the waterfront once the project is complete?

What option does the Pioneer Square community prefer?

The PSCA polled over 600 members of the organization to ask which option does the community prefer.

Of the responses received, 79% prefer the tunnel option. Thus, the Pioneer Square Community Association officially endorses the tunnel option as the preferred option identified in the DEIS.

The PSCA would also like to encourage WSDOT to fully investigate the current unofficial option of the "No build, No replacement" option that is being promoted by the People's Waterfront Coalition. This option should be included in any future decision matrix regarding the Viaduct.

Finally PSCA would like to encourage WSDOT to investigate the possibility of shortening the overall construction time of the viaduct replacement by completely closing the project area to present viaduct traffic. The shortened construction schedule and cost savings could potentially greatly outweigh the increase in disruption from a loss of circulation.

What neighborhood mitigation efforts should occur in association with this project?

The Pioneer Square National Historic District is a fragile and unique neighborhood that will suffer exponentially during the construction of a tunnel

PIONEER SQUARE: Where Seattle begins

C-003-001

FHWA, WSDOT and the City appreciate PSCA's continuing involvement with the project. Thank you for your comments. PSCA's preference for the 2004 Cut-and-Cover Tunnel Alternative is acknowledged. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information.

Many people asked the lead agencies to consider an alternative that would remove the viaduct and replace it with a new seawall, a four-lane surface roadway along the Alaskan Way surface street, and transit improvements. A four-lane Alaskan Way would create even more congestion on I-5 and downtown streets than the six-lane roadway evaluated in the Draft EIS. Careful study of this alternative shows that replacing the viaduct with a four-lane surface street would substantially increase congestion for most of the day and part of the evening on I-5 through downtown Seattle, downtown streets, and Alaskan Way. On downtown streets, traffic would increase by 30 percent, though traffic increases to specific areas like Pioneer Square and the waterfront could exceed 30 percent. With a four-lane roadway, traffic on Alaskan Way would quadruple to 35,000 to 56,000 vehicles per day compared to about 10,000 vehicles today. This traffic increase would make Alaskan Way the busiest street downtown, carrying more traffic than Mercer Street does today. With so much traffic shifted to street level, Alaskan Way won't be the pedestrian-friendly waterfront you would expect without a viaduct. The increased traffic congestion would also make travel times worse for buses. Finally, neighborhoods west of I-5 (Ballard, Queen Anne, Magnolia, and West Seattle) would be less accessible and would face longer commute times.

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS,

C-003-002

to replace the Viaduct. To fully mitigate the expected impacts upon our neighborhood, the Pioneer Square Community Association stands ready to assist WSDOT, SDOT and the City of Seattle in conducting community outreach to fully determine the extent and depth of projected impacts upon our neighborhood.

Our Association will advocate strongly for an appropriate mitigation package to be established and would like to begin work immediately with the Federal, State and City agencies in a collaborative, problem solving, and transparent method to establish this critical piece of the overall Viaduct replacement project.

C-003-003

How should Pioneer Square relate to the waterfront once the project is complete?

As a National Historic District, Pioneer Square's unique historic and cultural resources will be at risk both during and after the Viaduct project and it is critical that the neighborhood be given special design assistance in determining the ultimate look and feel of the post-Viaduct waterfront area.

We envision a very special place once the Viaduct replacement tunnel is built that is free from any net increase in roadway but still ensures the connectivity that is critical to our neighborhood's business district vitality. Special consideration should also be given in Pioneer Square to recognize the historic nature of our waterfront and convey through public art and history panels the continuing adaptation of this space to the changing face of Seattle's urban experience.

Sincerely,

Craig Montgomery
Executive Director

Glen Scheiber – GBSRE
PSCA Viaduct Planning Group Chair

many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

C-003-002

Thank you for your comment and your association's willingness to help with mitigation planning. FHWA, WSDOT, and the City of Seattle have been working with the Pioneer Square community (including your organization) since the Draft EIS was published to discuss construction effects and mitigation measures. These discussions will continue throughout project construction. In addition, the Final EIS provides much more detail about construction effects and proposed mitigation.

C-003-003

Under the Bored Tunnel Alternative the configuration of the Alaskan Way surface street will be determined by the Central Waterfront Project, which is a separate project being led by the City of Seattle. With the Cut-and-Cover Tunnel and Elevated Structure Alternatives, the Alaskan Way surface street would be improved as part of the Alaskan Way Viaduct Replacement Project. Under all alternatives, the design of Alaskan Way and other features in the Pioneer Square Historic District area will be done with its history in mind and be reviewed by the Pioneer Square Preservation Board.



City Neighborhood Council

c/o 400 Arctic Building, 700 Third Ave., Seattle, WA 98104-1848
Telephone: (206) 684-0719 Fax: (206) 233-5142 TDD: (206) 684-0446

May 27, 2004

DISTRICT COUNCILS:

- Ballard
- Central
- Delridge Neighborhoods
- Downtown
- East
- Greater Duwamish
- Lake Union
- Magnolia/Queen Anne
- North
- Northeast
- Northwest
- Southeast
- Southwest

Allison Ray
 AWV Project Office
 Wells Fargo Building
 999 Third Avenue
 Suite #2424
 Seattle, WA 98104
awvdeiscomments@wsdot.wa.gov

RECEIVED
 JUN 01 2004
 AWVSP Team Office

Dear Allison Ray:

Please accept this letter as the current City Neighborhood Council Comments on the Alaskan Way Viaduct and Seawall Replacement Project Draft Environmental Impact Statement.

Whereas the Alaskan Way Viaduct and Seawall Replacement Project (AWVSR) affects the economic vitality of all Seattle neighborhoods;

Whereas the AWVSR Project directly impacts the communities that are along and near SR 99 such as Ballard, BINMIC, QA, Belltown, Downtown CBD, SODO/Duwamish, West Seattle and others in unique ways and is critical to livability in those communities;

Whereas the AWVSR Project is a once in a lifetime opportunity to leave a legacy that will affect the quality of life in Seattle for the next 100 years;

Whereas the cost to complete the AWVSR will be high and the funds to complete the project are unsecured, we will need to be vigilant in creating a project design with a focus on the future;

Whereas community groups have a shared mission of improving their neighborhoods and participating in the public discussion on issues of common interest;

We therefore submit the following principals, values, and suggestions regarding the Alaskan Way Viaduct and Seawall Replacement Project.

The City Neighborhood Council's over-riding goal is to promote: continued traffic mobility, excellent urban design, economic health and a strong tax base improvement for Seattle:

- 1/ TRAFFIC CAPACITY -Retain or improve present capacity for passenger and freight vehicles in both directions of SR99 in the AWV segments. Retain North Portal access capacity via Western Ave. and Elliott Ave.

The CNC is empowered by City Council Resolutions to focus on neighborhood planning, budget review, and matching fund allocation.

C-004-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information on the alternatives. The purpose of replacing the viaduct is to protect public safety and provide essential vehicle capacity to and through downtown Seattle. All of the alternatives would provide sufficient capacity. With the preferred Bored Tunnel Alternative, north portal access would be near Harrison and Republican Streets and the connection between Alaskan Way and Elliott and Western Avenues would be constructed as a separate project. The Elliott and Western Avenue ramps are part of the Cut-and-Cover Tunnel and Elevated Structure Alternatives.

C-004-001

- C-004-002** | 3/ PASSENGER VEHICLE PARKING -Provide 100% replacement of present short-term parking in the zone of the project and on the Northern waterfront during and after construction. Integrate parking into the preferred alternative design strategy including bus staging, passenger vehicle load zones, and goods delivery zones.
- C-004-003** | 4/ ALTERNATIVE MODES OF TRANSPORTATION -Improve connective transit, pedestrian, and bicycle corridors between Alaskan Way and Elliott Bay waterfront, adjoining uplands, and the rest of Seattle. Fully utilize waterfront streetcar corridor extending to commercial areas to the north and south and connecting with the South Lake Union streetcar system via Western. Implement Western corridor prior to construction and close-down of waterfront corridor. Improve Coleman Dock transit/pedestrian, bicycle connections. Include BC ferry connection, improved cruise ship facilities' transportation connections. Improve north/south, east/west pedestrian connections.
- C-004-004** | 5/ FEDERAL/STATE HIGHWAY CONNECTIONS -Improve connections between SR99 and I-5. Phase improvements to mitigate traffic displacement during construction.
- C-004-005** | 6/ DISPLACEMENT OF TRAFFIC DURING CONSTRUCTION -Ensure that traffic displaced from Alaskan Way and Alaskan Way Viaduct can connect to I-5 and other routes including downtown avenues. Do not utilize surface lanes of Alaskan Way for all SR99 traffic. Provide additional alternative modes of transportation from West Seattle. Retain access for waterfront-located businesses and activities during and after construction. Utilize Western Ave. streetcar. Address central waterfront first.
- C-004-006** | 7/ NORTH WATERFRONT ACCESS -Do not preclude realignment below grade of BNSF between area of the existing tunnel portal and the vicinity of Eagle St.
- C-004-007** | 8/ SURFACE TRAFFIC UTILIZATION OF ALASKAN WAY -Ensure no net increase in surface vehicular lane capacity during/after construction.
- C-004-008** | 9/ NEW OPEN SPACE/COMMERCIAL REDEVELOPMENT -Maximize urban design opportunities for new public open spaces and commercial redevelopment opportunities: new public squares, parks, landscaped rights of way, retail frontages, etc.
- C-004-009** | 10/ Improve access northbound on ramp at Spokane Street and intersection of Spokane Street and the West Seattle Bridge.

Thank you for your consideration of these comments.

Sincerely yours,

Victor Barry by ww
Victor Barry, President
City Neighborhood Council

John Coney by ww
John Coney, Chair
CNC Transportation Committee

cc: Mayor Greg Nickels
Seattle City Council
CNC Members

C-004-002

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide frequent parking updates
- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

C-004-003

The final design of the waterfront will be determined by the Central Waterfront Project being led by the City of Seattle. In the south portion of the project area, bicycle lanes and sidewalks provided on surface streets would complement the Port Side and City Side Pedestrian/Bike Trails that will be constructed as part of the S. Holgate Street to S. King Street Viaduct Replacement Project. In the north portion of the project area, the shared-use facility on Mercer Street would increase bicycle connections across SR 99 and improve rider safety and overall experience in the Seattle Center/South Lake Union area. These enhancements to bicycle mobility would be further improved with the bicycle lanes included as part of the John Street crossing of SR 99. Several of the improvements suggested in this comment are outside of the project area. Please refer to the Final EIS for a current description of the alternatives.

C-004-004

In the early stages of the project, design modifications were evaluated near the Spokane Street area to determine whether access between I-5 and SR 99 could be improved. However, this element was not carried forward due to a variety of design challenges. Please see the Final EIS for updated design details.

Please see Chapter 6 of Appendix C, Transportation Discipline Report, for details about proposed construction mitigation, and Chapter 8 of the Final EIS for description of all proposed mitigation measures.

C-004-005

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing

the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

C-004-006

The preferred Bored Tunnel and Elevated Structure Alternatives will not affect the BNSF alignment in the area between Eagle Street and the existing BNSF portal near Virginia Street. The Cut-and-Cover Tunnel Alternative would likely affect the architectural concrete fascia at the BNSF portal structure but would not preclude realignment below grade in this area.

C-004-007

Currently, it is assumed that overall lane capacity will likely not be increased on the Alaskan Way surface street during construction. Please refer to the Final EIS for updated information. The ultimate design of Alaskan Way will be determined as part of the City of Seattle's Central Waterfront Project.

C-004-008

The City is developing a Central Waterfront Plan that will guide redevelopment of the central waterfront after the viaduct and seawall are replaced. A concept plan was published in July 2006, and the City will

begin the detailed master plan in 2011. The plan calls for new public spaces, public art, and a waterfront promenade.

C-004-009

Improving the intersection between Spokane Street and the West Seattle Bridge is not a part of this project. Information on the South Spokane Street Project can be found on the City of Seattle website <http://www.seattle.gov/transportation/spokanestreet.htm>.

Belltown Housing and Land Use Subcommittee
Belltown Community Council
c/o John Peterson, Chair
2000 First Ave #2301
Seattle, WA 98104

May 31, 2004

Allison Ray
WSDOT Environmental Coordinator
Alaskan Way Viaduct and Seawall Replacement Project
999 Third Ave., Suite 2424
Seattle, WA 98104

Dear Allison Ray:

This is a coordinated response from the Belltown Housing and Land Use Subcommittee (BHLUS) of the Belltown Community Council that represents those who live and work in Belltown. Please consider it complementary to the response from the Belltown Business Association (Chuck Stempler to Allison Ray dated 5/25/04) that represents businesses in Belltown.

We are very concerned that the Draft Environmental Impact Statement (DEIS) largely ignores the impact of the Viaduct replacement alternatives on the Belltown neighborhood. We have 6 areas of concern that must be addressed before the Final Environmental Impact Statement is released. These concerns are outlined below.

C-005-001

1. Impact of SR 99 related traffic on Western and Elliott Avenues

- a) By the design of the City of Seattle, both of these avenues are now in a residential neighborhood, with huge increases of residential units in the past 10 years. Any traffic increases on these two avenues caused by the viaduct replacement (such as closure of other exits and entrances) would have a negative impact on that residential character and must be avoided. We were unable to find in the thousands of pages of documentation how these Replacement Alternates would affect the traffic on these two avenues, but we expect it would increase. Belltown has accepted and embraced population density and diversity. It is time for the City to recognize that and by their actions support that residential character.
- b) The existing traffic patterns on these two avenues are not pedestrian friendly. Only half of the intersections on these two avenues have traffic lights to help pedestrians cross. There is a lack of "pedestrian bubbles" at intersections where they could be located. At a minimum, traffic lights need to be added and timed appropriately for a residential area (e.g. <25 mph).
- c) The pedestrian environment on these two avenues will become more important when the Olympic Sculpture Park (OSP) is completed at Broad Street. Then there will be east-west pedestrian traffic to the OSP on Broad, and the primary pedestrian routes from the Pike Place Market to the OSP will be Western and Elliott Avenues. Any added traffic without pedestrian amenities would be detrimental to this visitor-walking corridor.
- d) There are a number of dangerous pedestrian crossings in Belltown. Three of the worst are at Western Avenue and Bell Street, at Elliott Avenue and Battery Street, and at Elliott Avenue and the entrance to the existing viaduct. All of these should be fixed now, but the permanent resolution of these problems must be a priority of any viaduct replacement and must be specifically addressed in the Final EIS.

C-005-002

2. Physical/Visual impacts on Belltown

- a) There are many visual simulations in the DEIS, but none east- or west-looking in Belltown. That is unacceptable. We need to see the impact of the viaduct replacement at Lenora, Blanchard and Bell Streets.
- b) A buried SR99 in the central waterfront has great advantages to the central downtown and waterfront. A buried SR99 in the Belltown area would have similar benefits to Belltown and the north waterfront, but was not considered in any of the Alternatives. Such a buried or semi-buried alternative must be considered between the overpass over the railroad and the entrance to the Battery Street Tunnel in the final EIS.
- c) A fidded or semi-fidded SR99 could be an alternative to burial in this same area.

Jhp 5/26/04

1 of 2

C-005-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purpose and need and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

Although the Bored Tunnel alternative would remove the Elliott and Western ramps connecting to SR 99, the City of Seattle would provide a new connector from a reconstructed Alaskan Way surface street to Elliott and Western. The Elliott/Western Connector is an independent project from the Bored Tunnel Alternative. The connector would be four lanes wide and would provide an overcrossing of the BNSF mainline railroad tracks. Additionally, it would provide local street access to Pike and Lenora Streets and integrate back into the street grid at Bell Street, which would improve local street connections in Belltown. The new roadway would include bicycle and pedestrian facilities.

The project team is currently evaluating opportunities to improve pedestrian access and safety. More information about mitigation during construction can be found in Chapter 8 of the Final EIS and Appendix C, Transportation Discipline Report.

C-005-002

Appendices D and E, Visual Quality Technical Memorandum and Visual Simulations, from the Supplemental Draft and Final EISs include the view to the south down Elliott Avenue from Bell Street. The Visual Quality discussion describes the differences between the three alternatives, as to which design could act as a barrier, or conversely, allow a continuous corridor for views as well as for pedestrian movements.

Belltown Housing and Land Use Subcommittee
Belltown Community Council
c/o John Pehrson, Chair
2000 First Ave #2301
Seattle, WA 98121

- C-005-002 d) If it must be an aerial structure in this area, Landscape Architects should be hired to consider more attractive use of the space under the viaduct. This space is currently dark, un-inviting, and a health and safety concern.
- C-005-003 3. Viaduct Noise
a) Mitigation measures must be studied to reduce the traffic noise of the viaduct replacement in Belltown. We did not see these considerations in the DEIS.
b) A buried or semi-buried SR99 in Belltown, as discussed in 2.b) above, would certainly solve this problem.
c) If SR99 is not buried in Belltown, at least lids or vertical barriers should be added to reduce the noise.
d) In addition, special surface treatment of the roadway must be used to significantly reduce the noise
- C-005-004 4. Belltown access to the Waterfront
a) It is important to maintain or improve Belltown access to the Waterfront at Lenora. As we could find no elevations or visual simulations in this area we could not see the impacts.
b) It is important to improve Belltown access to the Waterfront at Bell. Again, as we could find no elevations or visual simulations in this area we could not see how access is being improved.
c) It is important to improve the safety of the access to the waterfront from Bell Street, specifically at Western and Bell Streets. This is currently dangerous, with high-speed traffic exiting SR99, merging with surface traffic on Western at a pedestrian crossing without traffic lights!
- C-005-005 5. Traffic on other Belltown Avenues and Streets
a) Avoid alternatives that put more through traffic on Belltown Avenues and Streets. This is a particular concern with the surface street alternate. Per the City of Seattle's design, Belltown is a highly dense residential neighborhood and not a traffic conduit for north/south traffic.
- C-005-006 6. Construction impacts
a) The project is proposing a 24-hour, 7-day per week construction schedule and variances from the City's noise control ordinances. This may be acceptable in business or commercial areas, but is not acceptable in residential areas like Belltown. Any noisy activity, beyond the City's noise code, is only allowed from 7:30am to 5:30pm for non-holiday weekdays for major projects in our area. That must be considered as a constraint for any noisy or disruptive construction activities in the residential areas of Belltown.

It is informative, that all six concerns expressed are consistent with the Belltown Neighborhood Plan, adopted by the City of Seattle in 1999.

We would appreciate the opportunity for the neighborhood to meet with your team to discuss these issues further in the coming months. Please contact us at your earliest convenience.

Sincerely,



John Pehrson, Chair
BHLUS
(206) 441-9913
pehrsonj@haleyon.com

cc: Peter Steinbrueck, City of Seattle, Councilmember
Tom Rasmussen, City of Seattle, Councilmember
Grace Crumican, City of Seattle, SDOT Director
Steve Pearce, City of Seattle, SDOT
Chuck Stempler, Belltown Business Association
Greg Schuler, Belltown Business Association
Zander Batchelder, Belltown Community Council

lhp 5/26/04

2 of 2

In the 2006 Supplemental Draft EIS, the Tunnel Alternative did consider two types of lid structures from Pike Street to Victor Steinbrueck Park. Also considered was the option of configuring SR 99 under Elliott and Western Avenues as it approached the Battery Street Tunnel.

C-005-003

Noise mitigation measures are discussed in Appendix F, Noise Discipline Report, and in Chapter 8 of the Final EIS. With the Cut-and-Cover Tunnel and Elevated Structure Alternatives, the majority of sensitive receptors in the Belltown area would not experience a significant change in noise levels compared to existing conditions. The preferred Bored Tunnel Alternative would decrease noise levels in the area just south of the Battery Street Tunnel, but it would not change noise levels significantly in other areas of Belltown.

C-005-004

Please see the Final EIS, Appendix C Transportation Discipline Report for updated discussion and analysis of pedestrian facilities and safety issues for the Bored Tunnel Alternative (preferred alternative), Cut-and-Cover Tunnel Alternative, and Elevated Structure Alternative in the Belltown area.

Although the Bored Tunnel alternative would remove the Elliott and Western ramps connecting to SR 99, the City of Seattle would provide a new connector from a reconstructed Alaskan Way surface street to Elliott and Western. The Elliott/Western Connector is an independent project from the Bored Tunnel Alternative. The connector would be four lanes wide and would provide an overcrossing of the BNSF mainline railroad tracks. Additionally, it would provide local street access to Pike and Lenora Streets and integrate back into the street grid at Bell Street, which would improve local street connections in Belltown. The new roadway would include bicycle and pedestrian facilities.

C-005-005

The alternatives analyzed in the Final EIS do not introduce additional connections in the Belltown area, and actually eliminate the Battery Street ramps to general purpose traffic, except for emergency and maintenance vehicles. While Elliott and Western Avenues will continue to carry heavy traffic volumes (as they do today), volumes on other streets in Belltown are generally not expected to increase for the three alternatives analyzed in the Final EIS. Please refer to the Final EIS Appendix C, Transportation Discipline Report, for more information regarding traffic impacts in the Belltown area.

C-005-006

Construction of the project will require nighttime construction activities, and the City requires a Major Public Project Construction Noise Variance. Construction noise mitigation requirements would be developed and specified in the noise variance. The Major Public Project Construction Noise Variance will be presented for public comment. Mitigation measures are described in the Final EIS and Appendix F, Noise Discipline Report.



Alaskan Way Viaduct and Seawall Replacement Project

Draft EIS Comment Form

Please use this form to give us comments on the Draft Environmental Impact Statement (Draft EIS) for the Alaskan Way Viaduct and Seawall Replacement Project. The comments you make will become part of the public record for this project. Your thoughts will help decision makers develop a preferred alternative. Responses to your comments will be provided in the Final EIS.

Contact Information: At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Name: JOHN PEARSON
 Organization/Membership Affiliation (optional): BHLUS
 Address: 2000 1st Ave. #2301
 City: Seattle State: WA Zip: 98121
 E-mail: pearsonj@halcyon.com

Check here if you would like to be added to the project mailing list.

I. Choose a topic:

- | | | |
|---|--|--|
| <input type="checkbox"/> Overall Project | <input type="checkbox"/> Tunnel Alternative | <input type="checkbox"/> Construction Impacts and Mitigation |
| <input type="checkbox"/> All of the Alternatives | <input type="checkbox"/> Bypass Tunnel Alternative | <input type="checkbox"/> Other |
| <input checked="" type="checkbox"/> Rebuild Alternative | <input type="checkbox"/> Surface Alternative | |
| <input type="checkbox"/> Aerial Alternative | <input type="checkbox"/> Seawall | |

C-006-001 What are your comments about the project?

① The Battery Street detour option is very neighborhood intrusive and should be avoided

C-006-002 ② Traffic on Elliott & Western are too heavy now. Options should be considered to reduce that

C-006-003 ③ The aerial section from Stewart to Bodley Street is neighborhood intrusive - ~~that~~ as alternative

(Please use additional paper if you need further comment space)
 Consider a tunnel or lid

C-006-001

After the 2004 Draft EIS was issued, numerous comments were received relating to the visual impacts and other negative effects of the Battery Street Flyover Detour. As the design plans for the Cut-and-Cover Tunnel and the Elevated Structure Alternatives evolved, the Battery Street Flyover Detour was eliminated.

C-006-002

The project has evolved since 2004. Please see the Final EIS for updated information. A connection between Alaskan Way and Elliott and Western Avenues would be a separate project with the Bored Tunnel Alternative. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would include ramps between SR 99 and Elliott and Western Avenues.

C-006-003

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. After the 2004 Draft EIS was published, your comments along with others led to additional planning, analysis, and the revised alternatives presented in the 2006 Supplemental Draft EIS. Following publication of the 2006 Supplemental Draft EIS, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the central waterfront portion of the Alaskan Way Viaduct with a single,



Alaskan Way Viaduct and Seawall Replacement Project

Draft EIS Comment Form

Please use this form to give us comments on the Draft Environmental Impact Statement (Draft EIS) for the Alaskan Way Viaduct and Seawall Replacement Project. The comments you make will become part of the public record for this project. Your thoughts will help decision makers develop a preferred alternative. Responses to your comments will be provided in the Final EIS.

Contact Information: At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Name: JOHN PEHRSON
Organization/Membership Affiliation (optional): BHLUS
Address: 2000 1st AVE. #2301
City: Seattle State: WA Zip: 98121
E-mail: pehrsonj@hakeyon.com

Check here if you would like to be added to the project mailing list.

1. Choose a topic:

- | | | |
|---|--|--|
| <input type="checkbox"/> Overall Project | <input type="checkbox"/> Tunnel Alternative | <input type="checkbox"/> Construction Impacts and Mitigation |
| <input checked="" type="checkbox"/> All of the Alternatives | <input type="checkbox"/> Bypass Tunnel Alternative | <input type="checkbox"/> Other |
| <input type="checkbox"/> Rebuild Alternative | <input type="checkbox"/> Surface Alternative | |
| <input type="checkbox"/> Aerial Alternative | <input type="checkbox"/> Seawall | |

What are your comments about the project?

C-006-004

all alternatives have an aerial section through Belltown (from Slaves to ~~Boat~~ the existing tunnel). This will be very noisy and visually ugly. Alternatives must be considered to reduce noise and ~~and~~ visual impacts.

(Please use additional paper if you need further comment space)

large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2004 Draft and 2006 Supplemental Draft EISs, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to identify the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront.

C-006-004

Noise levels for the build alternatives are shown in Chapter 5 of the Final EIS. Both of the tunnel alternatives would reduce noise levels in the area near the existing Elliott and Wester ramps, while the Elevated Structure Alternative noise levels would remain similar to existing conditions. North of the Elliott and Western Avenue ramps, the majority of sensitive receptors in the Belltown area would experience similar noise levels compared to existing conditions for all of the build alternatives. Please see the Final EIS Appendix F, Noise Discipline Report, for updated information on noise levels for each alternative.



**Belltown
Business Association**

2608 Second Avenue,
PMB 290
Seattle, WA 98121-1212

BBA DEIS Comments
5/25/2004
Page 1

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AWSP Team Office

BBA

May 25, 2004

Allison Ray
WSDOT Environmental Coordinator
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Ray:

The Belltown Business Association represents businesses operating in the area of the City bounded by Denny Way, Sixth Avenue, Virginia Street and Alaskan Way along the Waterfront. As such, we have many members who will be directly or indirectly impacted by the Alaskan Way Viaduct and Seawall Replacement project, some quite dramatically. We recognize that all of the alternatives will result in substantial and lengthy construction work in our neighborhood, but we also acknowledge the public necessity of this project. Therefore, in these comments we wish to highlight immediate concerns with the hope that close attention to these will be given by the project teams and that appropriate design efforts can be provided to addressing these "early on" in the process.

General Comment

C-007-001

Although there is considerable discussion about alternatives for the Viaduct and impacts in the immediate construction areas, there is very little information about impacts to much of the neighboring Belltown district, particularly in the traditional business district. It is not difficult for property owners and business interests here to visualize increases in general traffic, construction traffic, noise, and dust during the entire construction period; but no thorough analysis of this is presented. This lack of information contributes to uncertainty among business owners, particularly those who are considering establishing or renewing long-term leases.

Construction Alternatives

C-007-002

The construction of this project in all alternatives will be in itself a major impact to the Belltown community. There will be major disturbances and disruptions for all of us for many, many years. For many Belltown business owners and residents, this construction project will be a constant and immediate presence for a substantial percentage of their remaining lives. Yet, for nearly all alternatives there is only one proposed construction staging and scheduling approach portrayed, generally involving complex traffic ramping, routing, and construction of temporary viaduct

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C-007-001

Since the 2004 Draft EIS, the alternatives and construction approaches have been further developed as described in the 2006 Supplemental Draft EIS and the Final EIS. Potential impacts from the alternatives on the Belltown area, such as increases in traffic, noise, and dust during construction are described in the Final EIS Appendix C, Transportation Discipline Report; Appendix F, Noise Discipline Report; Appendix M, Air Discipline Report; and Appendix L, Economics Discipline Report. In addition, Appendix H, Social Discipline Report, describes potential effects on various social elements of the Belltown neighborhood.

Coordination with the Belltown neighborhood is ongoing. Outreach meetings have been conducted with several businesses regarding the potential for economic and other construction or operational impacts. Coordination will continue through the construction phase of the project.

C-007-002

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each



C-007-002

structures along the waterfront. Other construction staging and scheduling alternatives are not presented. For example, the project could demolish the entire viaduct at once and proceed ahead immediately and on all fronts with construction of the replacement. No information is provided about this alternative construction approach, and therefore, the community is not being given the opportunity to judge for itself whether it prefers an approach that may generate more intense impacts, but over a much shorter period and at arguably lower cost.

Temporary Traffic Routings

C-007-003

The construction period for all of the alternatives is very long, and the area of construction is relatively concentrated considering the length of time of the project. The Waterfront businesses (and particularly those located close to Broad) are going to be suffering with the temporary construction structures and traffic routings (plus all of the direct construction impacts such as noise and dust) for nearly a decade. For some of the alternatives, the ramps designed to temporarily route traffic at the bottom of Broad Street and over the railroad tracks will cause traffic to bypass the businesses located on or near Pier 70. For decades, Pier 70 has been a formidable challenge for commercial interests, but in recent years there have been noticeable improvements in the quality of tenants and operations in this facility. We want the engineering of the ramps and the by-passes to do the utmost to preserve accessibility and viability of the businesses in this area. For starters, it would seem that the Aerial Alternative, with its temporary viaduct structure planned from one end of the Waterfront to the other, does the least in addressing the needs of these waterfront businesses. Further attention to this issue of access needs to be given in the other alternatives as well.

Additionally, we strongly oppose a temporary option that would tunnel under Myrtle Edwards Park and the site for the future Olympic Sculpture Park in order to route traffic from Elliott to the Alaskan Way surface street. We have heard that this proposal may still be under consideration.

Viaduct Noise

C-007-004

The segment of SR99 between the south portal of the Battery Street Tunnel and the existing Viaduct is open to the air and generates considerable traffic noise affecting the hillside in Belltown and the Public Market. Is there any way that a lid or extension of the tunnel can be engineered into this project to eliminate this noise?

Traffic in Belltown

C-007-005

There is little or no information in the DEIS describing traffic volumes in Belltown both during construction and afterward, when the constructed alternative is put into operation. For the Surface Alternative (Page 124), it states that traffic on Downtown streets would increase by 16%

alternative and its construction plan, and Chapter 6 describes construction effects.

C-007-003

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

The Olympic Sculpture Park is now an existing public park. The underpass at Broad Street that was analyzed in the Draft EIS is no longer being considered.

C-007-004

Traditional methods of noise mitigation, such as noise barriers and berms, are not feasible to this project due to the location and densely developed nature of the project area. The Cut-and-Cover Tunnel Alternative considers a lid in the vicinity of Victor Steinbrueck Park. This is the only lid being considered for the project. Other noise abatement methods are addressed in the Final EIS in the form of a qualitative analysis.

The majority of sensitive receptors in the Belltown area would not experience a significant change in noise levels over existing conditions compared to the preferred the Bored Tunnel Alternative.

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C-007-005 (approximately 13,000 vehicles per day). We believe a sizeable share of this traffic would pass along Belltown Streets. We also believe that sizeable percentages of Downtown through-traffic will use Belltown Streets during construction of any of the alternatives, but there is no presentation or analysis of Belltown traffic in the DEIS. Ongoing traffic congestion will lessen the attraction of Belltown businesses to potential customers, and so we want evidence of a more thorough analysis of traffic planning for Belltown.

Construction Trucks and Equipment

C-007-006 Aside from the work that will be performed directly in Belltown (e.g., Battery Street Tunnel upgrades), there is no information about substantial flows of construction traffic through Belltown, other than Elliott and Western, which we must note are now virtually residential streets. In addition to Elliott and Western, we can visualize fairly constant use of the Downtown through-streets by heavy construction vehicles, delivery trucks, and equipment; but plans for staging and delivery of materials and equipment and for hauling and disposal of debris are not detailed in the DEIS. Therefore, it is difficult to determine how impacts of traffic congestion, dust, noise, and pavement wear-and-tear from construction traffic will occur and be minimized in the various sectors of our community.

Construction Noise

C-007-007 The Project is proposing a 24-hour, 7-day per week construction schedule and variances from the City's noise control ordinances. If this happens, will the greatest noise generators, e.g., pile drivers, be allowed to work at night? If this is the plan, then much more attention needs to be given to this plan as to how work can be scheduled and staged to minimize these situations.

Pedestrian Safety and Access

C-007-008 There is little discussion of pedestrian safety and pedestrian access in the DEIS, and this project provides an opportunity for significant improvements in an area that has some very serious pedestrian safety and access problems. Currently, the crossings of Western at Bell Street, Elliott at Battery, and Elliott at the on-ramp to the existing Viaduct are extremely dangerous. We request that the Project make the resolution of these pedestrian safety and access issues a high priority in the design for each of the alternatives. Additionally, we want to see how pedestrian traffic to the Waterfront will be maintained during construction, and a commitment to restoring pedestrian access to the Waterfront via Lander Street. It may be that with minimal additional expenditures, the Project can make a great public contribution toward pedestrian safety in these areas and solve some headaches that have been with us for years.

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C-007-005

Specific effects on arterial streets during construction and operations are evaluated in the Final EIS Appendix C (Sections 5 and 6), Transportation Discipline Report.

As explained in the 2010 Supplemental Draft EIS and the Final EIS, the Surface Alternative is no longer considered as it does not meet the project's purpose and need to provide capacity to and through downtown Seattle.

C-007-006

Chapter 6 the Final EIS and Appendix C, the Transportation Discipline Report, provide information on proposed construction haul routes and also describe the temporary construction effects. Chapter 8 of the Final EIS describes mitigation measures for traffic. The City of Seattle will not allow haul routes on streets where pavement conditions could not sustain the heavier loads and trip frequencies.

C-007-007

Construction of the project will require nighttime construction activities, and the City requires a Major Public Project Construction Noise Variance. Construction noise mitigation requirements would be developed and specified in the noise variance. The Major Public Project Construction Noise Variance was presented for public comment. The Final EIS and Appendix F, Noise Discipline Report, describe construction noise effect in the project area.

C-007-008

Please refer to the Final EIS for updated information on pedestrian facilities. As noted in the Final EIS, the Bored Tunnel Alternative would remove the Elliott and Western ramps, which would contribute to improved pedestrian safety in that area. The Program would reconfigure



**Belltown
Business Association**

2608 Second Avenue,
PMB 290
Seattle, WA 98121-1212

BBA

BBA DEIS Comments
5/25/2004
Page 4

Although the Viaduct and Seawall Replacement Project will present unavoidable challenges to our community, we are hoping that all concerned will work together in a spirit of cooperation and trust, and the Belltown Business Association is committed to doing that. We look forward to continuing discussion on these and other issues as the day for commencement of the project work approaches. For future communications with our organization, you may contact the chair of our Transportation Committee, Greg Schuler, at 206-268-4013 (e-mail: gschuler@antiochsea.edu).

Sincerely,

Chuck Stempler
President
Belltown Business Association

and improve the pedestrian environment in the vicinity of the existing Elliott and Western ramps. The Cut-and-Cover Tunnel Alternative also would reconfigure that area. For the Elevated Structure Alternative, the pedestrian environment would be similar to today.

Pedestrian access would be maintained at all times during construction activities. At times, it would be necessary to reroute pedestrians using temporary facilities/detours, but these detours would be designed to minimize any inconvenience. Any pedestrian facility (e.g., sidewalk, bridge, path, etc.) that may be removed to accommodate construction activities will be replaced with a temporary facility in a nearby location. Further details regarding the specifics of pedestrian detours during construction will become available once the construction plans evolve.

S. Lander Street currently terminates at the railroad tracks (Colorado Avenue S.), which would not change with any of the alternatives evaluated for the project. There is not currently, nor would there be with the project, pedestrian access to the waterfront via Lander Street. The discussion of pedestrian safety and access has been updated in the Final EIS to reflect the work that has been done since the Draft EIS was published.

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May 28, 2004

Ms. Allison Ray
 AWW Project Office
 Wells Fargo Bldg.
 999 Third Avenue, Suite 2424
 Seattle WA 98104

Subject: Alaskan Way Viaduct/Seawall Replacement DEIS Comments

Dear Ms. Ray:

The Executive Committee of the Ballard District Council has reviewed the AWW DEIS and offers the following comments, and request that additional information be provided in the FEIS. The Viaduct replacement project is of vital interest to the Ballard community. We support the replacement of the current structure (and seawall) because we know that it is an integral part of the transportation infrastructure that serves both the residential and commercial/industrial communities north and south of Downtown Seattle.

Our comments follow:

- C-008-001** 1. **It is important to maintain connections to and from Ballard/Interbay in the preferred alternative.** The Viaduct is a major transportation artery to and from the northwest parts of Seattle for freight and supplies, residents and workers. Access points to and from the viaduct at Western and Elliott are critical to us, and diverting access to other connections north would create adverse impacts on those areas. We cannot support any of the alternatives that do not include these access points. We request that the FEIS does not include any options that either eliminates or significantly decreases corridor capacity and access from Western or Elliott Avenues.
- C-008-002** 2. **In its alternative analysis, the FEIS should use a more inclusive definition of the benefits of public view corridors.** Thousands of people who travel the Viaduct daily benefit from the public views from the Viaduct. In many ways, it is a major gateway to the City. We ask that the FEIS address the benefits of public view retention and creation for travelers along an aerial structure (and conversely, its loss) when discussing the issue of view maintenance for those relatively few people in buildings whose private views might be affected if a new structure is developed.
- C-008-003** 3. **The central section of the Viaduct and seawall should be replaced first.** Both these projects are important in the maintenance of freight, automobile, and non-motorized traffic through the western portion of the Downtown. We request that the FEIS commits to an integrated sequential timing of construction of the entire AWW/Seawall project in order to maintain traffic flow.

Member Organizations:

15th Ave NW Association • 36th District Democrats • 36th District Green Party • Adams Elementary PTA • Ans Ballard • Ballard Chamber of Commerce • Ballard High School PTA • Ballard Historical Society • Ballard Merchants Association • Central Ballard Community Council • East Ballard Community Association • Friends of Burke Green Trail • Groundswell NW • Nordic Heritage Museum • North Beach Elementary PTA • North Seattle Industrial Association • Northwest Senior Center • Olympic Manor Community Club • Seawey Neighborhood Association • Shilshole Leisured Association • Sunset Hill Community Association • Sunset West Homeowners Association • Whittier Heights Community Council

C-008-001

Since 2004, the project has evolved (please refer to the Final EIS for updated information). The preferred Bored Tunnel Alternative would remove the Elliott and Western ramps. The connection between Alaskan Way and Elliott and Western Avenues would be constructed as a separate project. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would include ramps between SR 99 and Elliott and Western Avenues.

C-008-002

Many people have expressed that they enjoy the views when traveling on the viaduct. The visual character and quality of the views, as well as the likely viewer response of drivers and passengers, were discussed for each alternative in the 2004 Draft EIS, 2006 and 2010 Supplemental Draft EISs, and Final EIS.

The Final EIS analysis considers views in the SR 99 corridor, which is designated as a City of Seattle Scenic Route, and identifies and assesses designated view corridors largely along east-west streets. Views from the roadway and of the viaduct structure are both assessed. The lead agencies considered the visual quality analysis in Appendix D, Visual Quality Discipline Report, in the 2004 Draft EIS, and 2006 and 2010 Supplemental Draft EISs during the decisionmaking process.

C-008-003

The lead agencies agree that the seismically vulnerable sections need to be replaced as soon as possible. Chapter 3 of the Final EIS describes the construction sequencing, staging, and durations for the preferred alternative and other alternatives. Please refer to Chapters 6 and 8 in the Final EIS and Appendix C, Transportation Discipline Report for details about the temporary construction effects and mitigation for traffic.

C-008-004

4. The Ballard District Council believes the Aerial Alternative has comparative advantages over the other alternatives in terms of traffic capacity, safety and cost issues (See attached Statement of Principles adopted in March 2003). The Surface Alternative would severely reduce capacity for all modes of transportation. It mixes various automobile and freight traffic with bicyclists and pedestrians (tourists) along the waterfront and has potential for creating significant conflict among the different transportation modes. The Bypass-Tunnel alternative also reduces capacity for all modes of transportation and has similar potential safety conflicts. The Tunnel Alternative has two additional problems: it would not permit the transport of hazardous materials, and would require a significantly higher level of funding - a funding level that would be difficult to achieve. The Rebuild Alternative would result in a structure with narrow lanes, potentially causing a safety hazard and reduction in useful capacity.

Therefore, the Ballard District Council supports the Aerial Alternative. Our support of this alternative assumes that there will be concurrent improvements at grade level as well, in order to facilitate the movement of pedestrian and bicycle traffic.

We appreciate the opportunity to comment on the DEIS and hope that our observations and questions are addressed in the FEIS

Sincerely,



Warren Aakervik, Jr.
President

Attachment

C-008-004

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Aerial Alternative. Elements of the Rebuild and Aerial Alternatives were incorporated into the Elevated Structure Alternative to meet today's safety standards while minimizing the effects of a wider structure. This alternative was analyzed in the 2006 Supplemental Draft EIS, and the design was refined in the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

Principles to Guide Reconstruction/Replacement of the SR99/Alaskan Way Viaduct and Seawall

Adopted by BINMIC Action Committee

January 8, 2003

Ballard District Council March 2003

1. Recognize that BINMIC and Duwamish industrial areas are interdependent and require predictable and efficient connecting routes at all times. Efficient, effective arterial and rail connections along the entire SR99/Viaduct route are essential to the economic viability of both areas and the entire city.
2. Design Viaduct and Seawall projects so that automobile and truck access to and from Ballard/15th Avenue West to SR99/Alaskan Way Viaduct is grade-separated from railroad crossings and where possible, or due to significant access demands, from other modes of transportation as well. Access to SR99/viaduct will continue to be on the east side of the Burlington Northern main line tracks, or if access must be moved across the railroad tracks, this access must be grade separated. We recommend full consideration of either elevated (ramps) or tunneled options to ensure efficient corridor access, especially at the northwest portal (Western approaches from Elliott to Broad and Virginia).
3. Maintain or improve road and rail capacity for freight movement from the Ballard Interbay Northend Manufacturing Industrial Center to Alaskan Way after completion of the project. Other projects such as the Art Museum's sculpture garden and redevelopment of the waterfront urban corridor must not be allowed to reduce this capacity.
4. Maintain or improve freight access to the waterfront and Alaskan Way. Freight must be allowed to use any new or rehabilitated structures, and have continued access to the waterfront.
5. Maintain predictable access to and from the Ballard Interbay industrial area to SR99/viaduct and related freeways and arterials during construction, and use all possible means (email, web listings, real time signage) to alert corridor users of changes in access routes.
6. Maintain access and unrestricted movement by vehicles carrying hazardous material cargo through this corridor including any interim period during construction.
7. Design all roadway grades to accommodate the unique needs of freight vehicles.
8. Provide for direct freight access to downtown Seattle destinations, including particularly deliveries within the waterfront area and immediate uplands areas from Elliott to Spokane Street.
9. Coordinate the schedule and design for Viaduct and Seawall projects with other nearby transportation, utility, and private or public development projects, and avoid multiple, sequential, and redundant rights of way closures or restrictions.



May 28, 2004

Ms. Allison Ray
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104

**Subject: SR 99: Alaskan Way Viaduct & Seawall Replacement Project DEIS
Comments and Request for Additional Information**

Dear Ms. Ray:

We have reviewed the Draft Environmental Impact Statement prepared for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project. We fully agree that the viaduct is a vital link in the transportation network serving the City of Seattle and the larger Pacific Northwest Region. Because of its critical importance as a transportation link for commercial and industrial traffic, we support your efforts to plan for and replace the viaduct structure and seawall. On behalf of the members of the Ballard Interbay North Manufacturing Industrial Center (BINMIC), we offer the following comments, questions, and requests for additional information for your use as you move forward with selecting a preferred alternative and completing the Final EIS for the project.

C-009-001

1. **The BINMIC support the Rebuild Alternative as the preferred alternative.** This alternative would likely cause the least construction-related disruptions to businesses in the BINMIC; has the shortest duration for construction; is the only alternative that can be constructed in stages as funds are secured; and could continue to accommodate flammable/combustible freight movements to and from Ballard. Our position on this alternative reflects our belief that the transportation functionality of the Viaduct and its importance to the regional economy far outweigh any local view and property value benefits associated with other alternatives.

C-009-002

2. **The Western and Elliott Avenue ramps must be included in the preferred alternative.** The commercial and industrial businesses of North Seattle including Ballard/Interbay rely heavily on the Alaskan Way Viaduct for the movement of freight, supplies, and labor to, from, and through the City of Seattle. The access points to and from the viaduct at Western Avenue and Elliott Avenue are

C-009-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Rebuild Alternative. After studying several retrofitting concepts, the lead agencies found that rebuilding the viaduct would not be a cost-effective, long-term solution that adequately addresses the risks to public safety and the weakened state of the viaduct. Elements of the Rebuild and Aerial Alternatives were incorporated into the Elevated Structure Alternative, which was analyzed in the 2006 Supplemental Draft EIS and the Final EIS.

The Bored Tunnel Alternative would have the shortest construction duration as well as the least traffic impacts during construction of any of the build alternatives evaluated throughout the NEPA process. Although trucks carrying flammable/combustible freight will be precluded from using the bored tunnel to make connections to BINMIC, they will be able to use the Alaskan Way surface street and the new Elliott/Western Connector as described in Chapter 5 of the Final EIS. The addition of up to 6 minutes of travel time for these trips could contribute to an unavoidable loss of economic productivity for the businesses affected by these conditions. For additional detail on travel times, see Chapter 5 of Appendix C, Transportation Discipline Report.

C-009-002

The project has evolved since 2004, please refer to the Final EIS for updated information. The preferred Bored Tunnel Alternative would remove the Elliott and Western ramps. The connection between Alaskan Way and Elliott and Western Avenues would be constructed as a separate project led by the City of Seattle. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would include ramps between SR 99 and Elliott and Western Avenues.

C-009-002

absolutely critical for the viability of these businesses. While three of the alternatives (Rebuild, Aerial, and Surface) include replacement of these access points, two of the alternatives (Tunnel and Bypass Tunnel) only include access to Elliott and Western as options. We cannot support any alternative that eliminates or significantly degrades access from the Ballard/Interbay areas to the Alaskan Way Viaduct corridor. Alternatives or options that do not fully replace access to and from Western and Elliott Avenues should be eliminated from further consideration in the FEIS.

C-009-003

3. **The FEIS should evaluate the necessity of changes in the Mercer Street corridor, in particular elimination of the Broad Street underpass.** The analysis and discussion of the north-end improvements related to Mercer Street, the closure of a portion of Broad Street, and the new Thomas Street overpass are not adequate. There is no discussion or analyses that document why these elements are included as part of the AWW and Seawall replacement project. These elements reduce critical capacity between Interstate 5 and the waterfront and also sever the only east-west "Major Truck Street" defined by the City of Seattle. As a result, significant additional discussion and analysis should be included for all alternatives that require these elements. If these elements are not critical to the defined purpose and need of the project, they should be eliminated or included only as options.

4. **The FEIS should evaluate conditions without the tunnel under the BNSF Mainline tracks near Broad Street.** All of the alternatives include reference to the Broad Street tunnel improvement to grade-separate the road from the BNSF Mainline tracks, which is being considered separately by the City of Seattle. Since this separate improvement has been demonstrated to have major operational flaws and may not be constructed, all alternatives should be analyzed assuming this grade separation project will not occur. In particular, the revised analyses should reflect the anticipated impacts to traffic destined to and from the Ballard/Interbay (BINMIC) areas. This analysis should help reinforce why the ramps at Elliott and Western Avenues are critical components to be included in a preferred alternative.

C-009-004

5. **The FEIS should document impacts to other east-west corridors in Seattle, particularly during construction.** The DEIS does not adequately document the potential impacts to major east-west arterial routes throughout Seattle for each alternative during construction. The DEIS does disclose that the potential loss in capacity, change in access points, and added travel time along the SR-99 corridor will shift trips (including truck trips from the BINMIC areas) toward the east onto Interstate 5 or other north-south Seattle arterials. The Final EIS should document the impacts of these potential shifts on the major east-west arterial routes such as Spokane Street, Lander Street, SR-519, Mercer/Roy Corridor, Nickerson Street, Leary Way, and N 39th Street. It should also identify mitigation to accommodate these impacts.

C-009-005

6. **BINMIC cannot support the Surface Alternative because of its detrimental effect on traffic to and from Ballard/Interbay.** The DEIS documents that the Surface Alternative would result in a loss of capacity, additional travel delay, and congestion particularly for trips destined to and from the Ballard/Interbay (BINMIC) areas. The results reported for the freight measure of effectiveness (MOE FT1) also indicate that connections will be degraded. A 42% increase in northbound travel time and a 70% increase in southbound travel time is forecast

C-009-003

Because the project has evolved since comments were submitted in 2004, please see the Final EIS for updated information on the alternatives. Appendix C, Transportation Discipline Report, includes additional information on traffic and freight conditions. The Broad Street undercrossing is no longer part of the project and is not included in the Final EIS. Mercer Street would become a two-way street in the project area. The connection between Elliott and Western Avenues and Alaskan Way would be a separate project with the preferred Bored Tunnel Alternative. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would include ramps between SR 99 and Elliott and Western Avenues.

C-009-004

The Final EIS evaluates shifts in traffic and impacts to major east-west streets. Specific traffic impacts on major east-west corridors during the construction phase are documented in the Final EIS Appendix C, Transportation Discipline Report. The evaluation of construction traffic impacts defines and identifies traffic impacts in the downtown core and in neighboring areas such as Pioneer Square, Belltown, and the Stadium district. The analysis targets alternative north-south routes to the Alaskan Way Viaduct (including First Avenue, Second Avenue, etc.), as well as key east-west arterials in and around downtown.

C-009-005

The Surface and Bypass Tunnel Alternatives have been dropped from consideration because they did not meet the project's purpose. Both alternatives would have caused substantial increases in travel times and congestion.

C-009-005

between the Ballard Bridge and SR-519 for this alternative. In addition, this alternative would mix truck traffic destined between the BINMIC and the Duwamish areas with significant pedestrian, bicycle, and tourism traffic along a signalized surface arterial. These are not acceptable conditions to replace the existing regional transportation facility and we cannot support this alternative.

7. **BINMIC cannot support the Bypass Alternative because of its detrimental effect on traffic to and from Ballard/Interbay.** The DEIS documents that the Bypass-Tunnel Alternative would also result in a loss of capacity, additional travel delay, and congestion particularly for trips destined to and from the Ballard/Interbay (BINMIC) areas. The results reported for the freight measure of effectiveness (MOE FT1) also indicate that connections will be degraded. A 62% increase in southbound travel time is forecast between the Ballard Bridge and SR-519 for this alternative. In addition, this alternative would mix truck traffic destined between the BINMIC and the Duwamish areas with significant pedestrian, bicycle, and tourism traffic along a signalized surface arterial. These are not acceptable conditions to replace the existing regional transportation facility and we cannot support this alternative.

C-009-006

8. **The FEIS should define alternate routes for flammable and hazardous materials transport, particularly during construction AND if either the Tunnel or Bypass Tunnel Alternatives are selected.** The DEIS states that flammable and hazardous (including combustible) materials are and would continue to be prohibited in the Battery Street Tunnel for all alternatives. It also states that, for the Tunnel and Bypass-Tunnel Alternatives, flammable and hazardous materials could be prohibited in tunnel sections. Since flammable materials are currently permitted on the existing viaduct and since hazardous materials are permitted during off-peak hour, the DEIS should provide analysis and discussion about alternative routes for and impacts of removing these trips. Alternative routes should be designated and where necessary, appropriate mitigation (such as signage and turn radii improvements) should be identified.

C-009-007

9. **Construction planning must more thoroughly coordinate with other major projects, not just the Monorail project.** Page 291 of the Transportation Discipline Report notes that the Seattle monorail project is not expected to be complete until 2009 and the viaduct construction could begin in 2008. During 2008 and 2009 "there could be a short period where there are possible conflicts with project traffic detour plans and other construction processes." There could be a plethora of other transportation construction projects occurring during this period including projects on Interstate 5, City of Seattle streets, Sound Transit light rail or commuter rail lines, and the Washington State Ferries terminals. Detailed planning among all potential stakeholders should be evaluated during subsequent phases of project development to identify conflicts among all construction projects and identify appropriate mitigation strategies.

C-009-008

10. **The FEIS must thoroughly evaluate truck detours and alternative routes during construction.** Based on the DEIS, construction of three of the alternatives would close the Elliott Avenue/Western Avenue ramps to the SR-99 corridor for between 24 months and 114 months. The detour route for trucks along Alaskan Way would have one lane in each direction. Two of the alternatives would never replace these ramps (see comment 1 above). As pointed out in the DEIS, there are no reliable alternative routes for most trucks through Seattle. Delay, pedestrian/bicycle conflicts, and rail crossing conflicts

C-009-006

Transporting flammable or hazardous materials would be prohibited in the bored tunnel. Operators hauling these types of materials would need to use I-5 or Alaskan Way.

The project team is committed to working with the freight community and the City to define alternative routes and appropriate mitigation for the construction period. These are addressed in the Final EIS Appendix C, Transportation Discipline Report. In addition, WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

C-009-007

Chapter 6 in the Final EIS discusses other major construction projects in the downtown area that may overlap with the Alaskan Way Viaduct construction schedule. Since the Draft EIS was published in 2004, the Seattle Monorail Project has been cancelled and the Seattle Ferry Terminal Project has been delayed. The Alaskan Way Viaduct Replacement Project will continue to coordinate with the other major construction projects in the area.

C-009-008

FHWA, WSDOT, and the City of Seattle are committed to working with the freight community to develop alternative freight routes and strategies to address freight concerns during the construction period. The project has identified a number of strategies designed specifically for freight, in addition to the strategies designed to reduce travel demand and mitigate traffic congestion. All strategies identified for freight and general traffic will be in-place prior to major construction. Chapter 8 of the Final EIS and Appendix C, the Transportation Discipline Report, also discuss the effects and mitigation for freight during construction.

The construction plans for all alternatives assume construction could

C-009-008

along the Alaskan Way surface street reduce speeds and reliability for trucks along this route. Heavy congestion on I-5 persists for much of the day. Trucks larger than 27 feet are currently prohibited from Downtown Seattle streets north of King Street between 6:00 A.M. and 6:00 P.M. As a result, alternate truck routes must be designated and local truck-route improvements must be included as mitigation for construction-related impacts. The possibility of changing the downtown truck restrictions should also be evaluated.

11. **Construction should be allowed to occur 24-hours per day.** All future analyses and planning for the selected preferred alternative should continue to assume construction would occur 24-hours per day, 7-days per week. Due to the extreme hardship that construction detours and closures will cause, the construction period needs to be as short as possible. While we understand the local impacts of 24-hour construction impacts, the larger region-wide impacts of halting construction for any period of time would far outweigh the local impacts.
12. **Construction phasing should address most vulnerable sections of viaduct first.** To the extent possible, the most vulnerable sections of the viaduct structure should be replaced first. We recognize the constraints of construction phasing, and understand the current construction plans include rehabilitation of the Battery Street Tunnel early in the construction process. However, for the selected Preferred Alternative, the Final EIS should detail an alternative construction plan that would allow the project to replace those sections most vulnerable to seismic failure as early as possible.
13. **Economic and business losses during construction should be factored into the decision for the preferred alternative.** The cost figures provided for each alternative do not appear to account for the significant cost elements associated with the variation in construction time. Decision makers should be provided with estimates of the cost to the local economy of each alternative's construction impacts. For example, the Aerial Alternative would require between two and four year longer to build than the other alternatives. This additional construction time would extend by up to 50% the significant operational and economic hardships compared to the other alternatives. These additional costs should be fairly presented.
14. **The project area should not include the area of SR 99 north and east of the Battery Street Tunnel.** This area more appropriately should be part of the transportation studies for the South Lake Union/Mercer Corridor Area.

C-009-009

C-009-010

Sincerely,



John R. Kane
Chairman – BINMIC Action Committee

occur up to 24 hours a day, 7 days a week. The lead agencies must balance the construction schedule with the transportation needs in the corridor when deciding how long SR 99 will be completely closed during construction. Not all types of construction activities would be allowed 24 hours a day. For example, as part of the mitigation measures associated with the noise variance permit, the noisiest construction activities will likely be limited to daytime hours. Please refer to the Final EIS and Appendix C, Transportation Discipline Report for details about the temporary construction effects and mitigation for traffic.

C-009-009

These economic and business effects have been taken into consideration during all phases of the project design and development of construction sequencing, along with other environmental effects. These effects and mitigation measures for the current alternatives are described in the Final EIS and Appendix L, Economics Discipline Report. The project team will continue to work with businesses throughout the construction process.

C-009-010

The project area that is north and east of the Battery Street Tunnel is part of the project because it is an important part of the transportation system that connects SR 99 to both the viaduct portion of SR 99 and local streets. Two purposes of the project as stated in the purpose and need statement are to:

- Provide capacity for automobiles, freight, and transit to efficiently move people and goods to and through downtown Seattle, and
- Provide linkages to the regional transportation system and to and from downtown Seattle and the local street system.

This includes access to and from downtown, which is provided by

connections made north of Battery Street Tunnel. Therefore, these areas are part of the same corridor from a transportation planning perspective.



RECEIVED
JUN 02 2004
AWWSP Team Office

June 1, 2004

Ms. Allison Ray
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104

**Subject: SR 99: Alaskan Way Viaduct & Seawall Replacement Project DEIS
Comments from the Seattle Manufacturing Industrial Council**

Dear Ms. Ray:

We have reviewed the Draft Environmental Impact Statement prepared for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project with respect to how it could affect the industrial areas of Seattle. The Manufacturing Industrial Council of Seattle (MIC) represents businesses in the Duwamish and Ballard Interbay Industrial (BINMIC) areas of Seattle. The "lifeline" linking these two areas is the Alaskan Way Viaduct.

We appreciate the efforts of WSDOT and City of Seattle staff to understand the issues affecting our constituents. Staff from both agencies have attended many MIC meetings and workshops. We trust that we will have continued opportunities to discuss detailed issues with the design team as a preferred alternative progresses into the next phase of design and construction planning.

Our comments regarding the project are detailed below. The MIC's comments primarily relate to our preferences and major design issues.

Regional Mobility

C-010-001

1. **The MIC strongly supports replacing the Alaskan Way Viaduct with a facility that, at a minimum, retains the existing regional traffic and freight mobility functions.** The Alaskan Way Viaduct is critical to continued economic success of both the Duwamish and BINMIC industrial areas. If it were to fail or be replaced with a facility that has less capacity, it would remove the primary freight link connecting these two areas. Total loss of capacity would also force tens of thousands of vehicles onto Interstate 5 and other surface streets through out Seattle, choking the ability to move freight into, out of, and through Seattle. Total loss of the facility could also significantly hamper freight rail movements to and through Seattle. The MIC supports alternatives that at least retain the existing capacity of the facility.
2. **The MIC does not support either the Surface or Bypass Tunnel Alternatives because they would reduce capacity of the corridor and impede access to Ballard/Interbay.** The DEIS shows that both of these alternatives would result in a loss of capacity, additional travel delay, and congestion particularly for trips destined to and from the BINMIC. These conditions are not acceptable to the MIC.
3. **Multiple routes for over-dimension cargo must be retained through Seattle.** Surface Alaskan Way is the major north-south route for over-dimension cargo in Seattle. However, other over-dimension routes are also critical and cannot be affected by the Viaduct project. These include Westlake Avenue, which is a primary over-dimension route to access Fremont and the South Lake Union area.

C-010-002

C-010-001

The preferred Bored Tunnel Alternative meets the project's purpose and provides sufficient capacity in the SR 99 Corridor. The Surface and Bypass Tunnel Alternatives have been dropped from consideration because they did not meet the project's purpose. Both alternatives would have caused substantial increases in travel times and congestion.

C-010-002

No changes are proposed for Westlake Avenue as part of the Project. FHWA, WSDOT, and the City of Seattle are committed to working with the freight community to develop alternative freight routes and strategies to address freight concerns during the construction period.

Coordination with the City of Seattle Department of Transportation to review freight route adjustments, including accommodations for over-legal vehicles, is ongoing. Currently, the City allows access through the Seattle Center City, provided that operators of over-legal trucks obtain a permit and operate their trucks only during times allowed for in the permit. As the project progresses, outreach to the freight community will occur to address the needs of over-legal trucks either as part of the preferred Bored Tunnel Alternative or on surface Alaskan Way after construction. Analysis results addressing impacts to freight are provided in Appendix C, Transportation Discipline Report, of the Final EIS.

C-010-003

4. **The Viaduct should be considered as part of a regional system connecting to Interstate 5 at the south via SR 509.** The MIC is an ardent supporter of the SR 509 extension project because it provides additional north-south capacity between the Duwamish area and the Kent Valley. The Viaduct continues this access connection to the BINMIC area. It is along this spine that the vast majority of the entire Pacific Northwest's industrial businesses are located. The need for and benefits of this entire corridor, including the SR 509 extension, should be discussed in the FEIS.

Access for Ballard/Interbay

C-010-004

5. **The Western and Elliott Avenue ramps must be included in the preferred alternative.** These ramps provide the primary connection between BINMIC and the Viaduct corridor. If they are not included, all traffic destined to Ballard and Interbay would have to use surface Alaskan Way, which is not acceptable.

The design of the new ramps at Western and Elliott Avenues should improve on the conditions that exist today. Specifically, treatments that reduce the conflicts between truck traffic and pedestrian crossings at the head of each ramp should be included. Increased capacity for the southbound on-ramp traffic should also be evaluated to reduce the queuing that now occurs on southbound Elliott Avenue. If possible, pedestrian movements could be relocated to pass under the ramp to completely eliminate the conflict. Alternatively, the design could consider a dual right turn onto the ramp merging to one lane after the pedestrian crossing.

C-010-005

6. **The Preferred Alternative should be designed to retain the Broad Street underpass in the Mercer Corridor improvements.** According to the City of Seattle's *Mercer Corridor Project March Newsletter*, both of the two alternatives being considered for the Mercer Corridor retain the Broad Street underpass. Loss of this underpass could cause severe congestion and delay for traffic traveling from Interstate 5 to the Elliott Avenue corridor and on to BINMIC. Broad Street is part of the major east-west truck corridor and one of the only routes that allows trucks to bypass the Seattle Center. The Preferred Alternative should retain this important facility.

C-010-006

7. **The FEIS should define alternate routes for flammable and hazardous materials transport, if either the Tunnel or Bypass Tunnel Alternatives are selected.** The DEIS states that flammable and hazardous (including combustible) materials are and would continue to be prohibited in the Battery Street Tunnel for all alternatives. It also states that, for the Tunnel and Bypass-Tunnel Alternatives, flammable and hazardous materials could be prohibited in tunnel sections. Since flammable materials are currently permitted on the existing viaduct and since hazardous materials are permitted during off-peak hour, the FEIS should provide analysis and discussion about alternative routes for and impacts of removing these trips. Alternative routes should be designated and where necessary, appropriate mitigation (such as signage and turn radii improvements) should be identified.

Access for Duwamish Industrial Area

C-010-007

8. **The MIC supports alternatives that provide new ramps/access at SR 519.** Providing access to SR 519 will not only improve freight mobility to the northern section of the Duwamish, it will also reduce traffic on other key north-south arterials in the Duwamish such as 1st and 4th Avenues S.
9. **The Preferred Alternative should allow for increased capacity on SR 519.** The Preferred Alternative for the Alaskan Way Viaduct should not preclude the ability to increase east-west capacity in the SR 519 corridor between the waterfront and Interstate 5/Interstate 90. Analysis in the DEIS shows that concentrating east-west travel into just the Atlantic Street corridor would cause the intersection of Atlantic

C-010-003

Thank you for your comment. The project recognizes the importance of SR 99 to the regional transportation system.

C-010-004

The project has evolved since 2004, please refer to the Final EIS for updated information. The preferred Bored Tunnel Alternative would remove the Elliott and Western ramps. The connection between Alaskan Way and Elliott and Western Avenues would be constructed as a separate independent project associated with the Bored Tunnel Alternative. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would provide a functionally similar connection with SR 99 ramps at Elliott and Western Avenues, similar to the existing viaduct structure.

C-010-005

Under all three build alternatives analyzed in the Final EIS, Broad Street would be closed between Fifth Avenue N. and Ninth Avenue N. so that the street grid could be reconnected. Mercer Street would continue to cross under SR 99 as it does today, but it would be widened and converted to a two-way street with three lanes in each direction and a center turn lane. Please see Appendix C, Transportation Discipline Report, of the Final EIS for a discussion of the transportation impacts of the three build alternatives.

C-010-006

Currently, transporting hazardous materials is prohibited at all times in the Battery Street Tunnel, and during peak periods on the viaduct. This would continue to be the case with the Elevated Structure Alternative. Transporting flammable or hazardous materials would be prohibited in the tunnel for the preferred Bored Tunnel Alternative and the Cut-and-Cover Tunnel Alternative. Operators hauling these types of materials

C-010-007

Street/1st Avenue S to fail. Expansion of this intersection is nearly impossible because of the location of Safeco Field and the parking garage on the opposite side of the street. In addition, eastbound traffic between the waterfront and 4th Avenue is often prohibited before and after Mariner's games. Therefore, the MIC requests that the preferred alternative maximize east-west capacity in this corridor by providing multiple connections (to both Atlantic Street and Royal Brougham Way), and by not precluding an eventual one-way couplet as originally proposed for this corridor.

Construction Impacts

Most of the negative impacts of the Viaduct project relate to road closures or delays during construction. Construction impacts would severely affect businesses in BINMIC because they frequently use this corridor. Construction impacts throughout the Duwamish would primarily be related to additional traffic congestion along parallel routes caused by construction closures or delays.

C-010-008

10. **Long-term closure of the Viaduct during construction is unacceptable.** Although not discussed in the DEIS, we understand that some review is proceeding related to long-term closure of the Viaduct to speed up the construction process. Most of our constituent industrial businesses plan in a 10-year horizon. If the Viaduct were to be closed for long periods of time, some businesses may opt to relocate or expand outside of the Seattle area. Seattle may never recover from the loss of these businesses. Therefore, the preferred alternative must be constructed in a way that minimizes closure of the Viaduct. If the Viaduct or its access ramps must be eliminated for periods longer than 3 months, then suitable detour routes that provide nearly equivalent travel time from freight movements must be provided. Although closing the Viaduct may reduce the overall cost of the project, the economic impact to businesses in Seattle should be considered when selecting a Preferred Alternative.
11. **The FEIS must thoroughly evaluate truck detours and alternative routes during construction.** Based on the DEIS, construction of three of the alternatives would close the Elliott Avenue/Western Avenue ramps to the SR-99 corridor for between 24 months and 114 months. However, the detour routes discussed in the DEIS are unacceptable to BINMIC, and few alternatives exist. For example, the detour route for trucks along Alaskan Way would have only one lane in each direction; Interstate 5 is already heavily congested for much of the day; and trucks larger than 27 feet are currently prohibited from Downtown Seattle streets north of King Street between 6:00 A.M. and 6:00 P.M. Therefore, it is imperative that alternative truck routes that provide nearly equivalent travel time to the BINMIC be provided if the Elliott/Western Avenue ramps are closed for long periods of time.
12. **Construction planning must more thoroughly coordinate with other major projects, not just the Monorail project.** Page 291 of the Transportation Discipline Report notes that the Seattle monorail project is not expected to be complete until 2009 and the viaduct construction could begin in 2008. During 2008 and 2009 "there could be a short period where there are possible conflicts with project traffic detour plans and other construction processes." There could be a plethora of other transportation construction projects occurring during this period including projects on Interstate 5, City of Seattle streets, Sound Transit light rail or commuter rail lines, and the Washington State Ferries terminals. Detailed planning among all potential stakeholders should be evaluated during subsequent phases of project development to identify conflicts among all construction projects and identify appropriate mitigation strategies.
13. **Adequate funding for temporary traffic control and police officer control must be included in the construction budgets.** The Seattle Police Department provides the most effective temporary traffic control when manned flaggers are required. The efficiency of this traffic control increases if the same personnel can be used every day because they become familiar with traffic flow and the influence of upstream or downstream intersection operations. Recent budget cuts and/or the effect of multiple construction projects in Seattle may affect the quality of traffic control that can be provided during

C-010-009

would need to use I-5 or Alaskan Way.

The project team is committed to working with the freight community and the City to define alternative routes and appropriate mitigation for the construction period. These are addressed in Appendix C, Transportation Discipline Report, of the Final EIS. Mitigation measures are described in Chapter 8 of the Final EIS.

C-010-007

Please see Chapter 3 of the Final EIS for a description of the three build alternatives analyzed and the configuration of the on- and off-ramps in this area. Work on the SR 519 Project is complete. The SR 519 Project improved connections for traffic heading to the Port of Seattle terminals, Colman Dock ferry terminal, central waterfront area, sports stadiums, and destinations in Seattle's SODO neighborhood. SR 519 improvements separate car, freight, pedestrian, and rail traffic to help improve mobility and pedestrian safety and reduce the risk of collisions. All major work was completed before the start of construction to replace the Alaskan Way Viaduct between S. Holgate and S. King Streets.

C-010-008

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and

C-010-009

construction. Adequate budget should be included in the project to fund trained police staff for these traffic control functions.

C-010-010

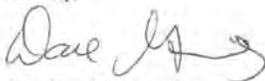
14. **The FEIS should document impacts to other east-west corridors in Seattle, particularly during construction.** The DEIS does not adequately document the potential impacts to major east-west arterial routes throughout Seattle for each alternative nor during construction. The DEIS does disclose that the potential loss in capacity, change in access points, and added travel time along the SR-99 corridor will shift trips (including truck trips from the BINMIC areas) toward the east onto Interstate 5 or other north-south Seattle arterials. The Final EIS should document the impacts of these potential shifts on the major east-west arterial routes such as Spokane Street, Lander Street, SR-519, Mercer/Roy Corridor, Nickerson Street, Leary Way, and N 39th Street. It should also identify mitigation to accommodate these impacts.

Flexible Transportation Package

C-010-011

15. We understand that freight-related items may be included in the Flexible Transportation Package that would be implemented during construction to relieve congestion. Freight-related items that may be appropriate for this package include:
- Do not restrict the hours in which freight can move through the system. The logistical constraints with coordinating all deliveries, loading, and unloading only during nighttime hours simply make this ineffective and often not feasible.
 - Radio alerts and e-mail dispatches related to construction delays, lane closures, and alternative routes.
 - Designated truck routes or lanes along roadways with acceptable grades, intersection turn radii, and clearance (lateral and vertical). The truck routes should include both north-south alternatives and east-west routes. Improvements may be required in some locations to provide lateral or vertical clearance.
 - Designated truck routes for flammable, hazardous, and combustible materials during times when the viaduct and/or surface Alaskan Way are not available.
 - Alternate over-dimension routes during times when surface Alaskan Way is not available.
 - All project construction detours and truck route planning should consider other construction projects throughout Seattle. Projects along I-5, on City streets, at the Ferry Terminals, and on other major state routes should be coordinated with the viaduct construction and communication plan.

Sincerely,



Dave Gering, Executive Director
Manufacturing Industrial Council of Seattle

Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

Chapter 8 of the Final EIS and Appendix C, Transportation Discipline Report, provide information on construction haul routes and also describe the temporary construction effects and mitigation for traffic. The City of Seattle will likely not allow haul routes on streets where pavement conditions could not sustain the heavier loads and trip frequencies. Access to and from SR 99 would be provided by new ramps near the stadiums and near Seattle Center. If the Bored Tunnel Alternative is selected, the City of Seattle would construct a new road between Alaskan Way and the Elliott/Western corridor.

Chapter 6 of the Final EIS discusses other major construction projects in the downtown area that may overlap with the Alaskan Way Viaduct construction schedule. Since the Draft EIS was published in 2004, the Seattle Monorail Project has been cancelled and the Seattle Ferry Terminal Project has been delayed. The Alaskan Way Viaduct Replacement Project will continue to coordinate with the other major construction projects in the area.

C-010-009

Project cost estimates include funding for police and other traffic control measures during construction.

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The Final EIS evaluates shifts in traffic and impacts to major east-west streets. Specific traffic impacts on major east-west corridors during the construction phase are documented in the Final EIS Appendix C,

Transportation Discipline Report. The evaluation of construction traffic impacts defines and identifies traffic impacts in the downtown core and in neighboring areas such as Pioneer Square, Belltown, and the Stadium district. The analysis targets alternative north-south routes to the Alaskan Way Viaduct (including First Avenue, Second Avenue, etc.), as well as key east-west arterials in and around downtown.

C-010-011

Thank you for your comment regarding the Flexible Transportation Package (FTP). Since the Draft EIS was published in 2004, the FTP has been further developed as part of the project's construction transportation planning process (though the name FTP is no longer being used). The Final EIS details a proposed set of actions aimed at managing mobility and reducing travel impacts associated with construction of the Alaskan Way Viaduct Replacement Project. These actions are intended to help transit operate efficiently given increased general-purpose traffic in the downtown Seattle area during construction. These actions should improve transit access through downtown Seattle and minimize the effect of peak period traffic congestion for transit passengers and operators.

North Seattle Industrial Association

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RECEIVED
JUN 01 2004
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May 25, 2004

Ms. Allison Ray
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104

**Subject: SR 99: Alaskan Way Viaduct & Seawall Replacement Project DEIS
Comments and Request for Additional Information**

Dear Ms. Ray:

We have reviewed the Draft Environmental Impact Statement prepared for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project. We fully agree that the viaduct is a vital link in the transportation network serving the City of Seattle and the larger Pacific Northwest Region. Because of its critical importance as a transportation link for commercial and industrial traffic, we support your efforts to plan for and replace the viaduct structure and seawall. On behalf of the members of the North Seattle Industrial Association (NSIA), we offer the following comments, questions, and requests for additional information for your use as you move forward with selecting a preferred alternative and completing the Final EIS for the project.

C-011-001

1. **The NSIA support the Rebuild Alternative as the preferred alternative.** This alternative would likely cause the least construction-related disruptions to businesses in the NSIA; has the shortest duration for construction; is the only alternative that can be constructed in stages as funds are secured; and could continue to accommodate flammable/combustible freight movements to and from Ballard. Our position on this alternative reflects our belief that the transportation functionality of the Viaduct and its importance to the regional economy far outweigh any local view and property value benefits associated with other alternatives.

C-011-002

2. **The Western and Elliott Avenue ramps must be included in the preferred alternative.** The commercial and industrial businesses of North Seattle including Ballard/Interbay rely heavily on the Alaskan Way Viaduct for the movement of freight, supplies, and labor to, from, and through the City of Seattle. The access points to and from the viaduct at Western Avenue and Elliott Avenue are

C-011-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Rebuild Alternative. After studying several retrofitting concepts, the lead agencies found that rebuilding the viaduct would not be a cost-effective, long-term solution that adequately addresses the risks to public safety and the weakened state of the viaduct. Elements of the Rebuild and Aerial Alternatives were incorporated into the Elevated Structure Alternative, which was analyzed in the 2006 Supplemental Draft EIS and the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

C-011-002

Since 2004, the project has evolved (please refer to the Final EIS for updated information). The preferred Bored Tunnel Alternative would remove the Elliott and Western ramps. The connection between Alaskan Way and Elliott and Western Avenues would be constructed as a separate project. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would include ramps between SR 99 and Elliott and Western Avenues.

C-011-002

absolutely critical for the viability of these businesses. While three of the alternatives (Rebuild, Aerial, and Surface) include replacement of these access points, two of the alternatives (Tunnel and Bypass Tunnel) only include access to Elliott and Western as options. We cannot support any alternative that eliminates or significantly degrades access from the Ballard/Interbay areas to the Alaskan Way Viaduct corridor. Alternatives or options that do not fully replace access to and from Western and Elliott Avenues should be eliminated from further consideration in the FEIS.

C-011-003

3. **The FEIS should evaluate the necessity of changes in the Mercer Street corridor, in particular elimination of the Broad Street underpass.** The analysis and discussion of the north-end improvements related to Mercer Street, the closure of a portion of Broad Street, and the new Thomas Street overpass are not adequate. There is no discussion or analyses that document why these elements are included as part of the AWV and Seawall replacement project. These elements reduce critical capacity between Interstate 5 and the waterfront and also sever the only east-west "Major Truck Street" defined by the City of Seattle. As a result, significant additional discussion and analysis should be included for all alternatives that require these elements. If these elements are not critical to the defined purpose and need of the project, they should be eliminated or included only as options.

4. **The FEIS should evaluate conditions without the tunnel under the BNSF Mainline tracks near Broad Street.** All of the alternatives include reference to the Broad Street tunnel improvement to grade-separate the road from the BNSF Mainline tracks, which is being considered separately by the City of Seattle. Since this separate improvement has been demonstrated to have major operational flaws and may not be constructed, all alternatives should be analyzed assuming this grade separation project will not occur. In particular, the revised analyses should reflect the anticipated impacts to traffic destined to and from the Ballard/Interbay (BINMIC) areas. This analysis should help reinforce why the ramps at Elliott and Western Avenues are critical components to be included in a preferred alternative.

C-011-004

5. **The FEIS should document impacts to other east-west corridors in Seattle, particularly during construction.** The DEIS does not adequately document the potential impacts to major east-west arterial routes throughout Seattle for each alternative during construction. The DEIS does disclose that the potential loss in capacity, change in access points, and added travel time along the SR-99 corridor will shift trips (including truck trips from the BINMIC areas) toward the east onto Interstate 5 or other north-south Seattle arterials. The Final EIS should document the impacts of these potential shifts on the major east-west arterial routes such as Spokane Street, Lander Street, SR-519, Mercer/Roy Corridor, Nickerson Street, Leary Way, and N 39th Street. It should also identify mitigation to accommodate these impacts.

C-011-005

6. **NSIA cannot support the Surface Alternative because of its detrimental effect on traffic to and from Ballard/Interbay.** The DEIS documents that the Surface Alternative would result in a loss of capacity, additional travel delay, and congestion particularly for trips destined to and from the Ballard/Interbay

C-011-003

Because the project has evolved since comments were submitted in 2004, please see the Final EIS for updated information on the alternatives. Appendix C, Transportation Discipline Report, includes additional information on traffic and freight conditions. The Broad Street undercrossing is no longer part of the project and is not included in the Final EIS. Mercer Street would become a two-way street in the project area. The connection between Elliott and Western Avenues and Alaskan Way would be a separate project with the preferred Bored Tunnel Alternative. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would include ramps between SR 99 and Elliott and Western Avenues.

C-011-004

The Final EIS evaluates shifts in traffic and impacts to major east-west streets. Specific traffic impacts on major east-west corridors during the construction phase are documented in the Final EIS Appendix C, Transportation Discipline Report. The evaluation of construction traffic impacts defines and identifies traffic impacts in the downtown core and in neighboring areas such as Pioneer Square, Belltown, and the Stadium district. The analysis targets alternative north-south routes to the Alaskan Way Viaduct (including First Avenue, Second Avenue, etc.), as well as key east-west arterials in and around downtown.

C-011-005

The Surface and Bypass Tunnel Alternatives have been dropped from consideration because they did not meet the project's purpose. Both alternatives would have caused substantial increases in travel times and congestion.

C-011-005

(BINMIC) areas. The results reported for the freight measure of effectiveness (MOE FT1) also indicate that connections will be degraded. A 42% increase in northbound travel time and a 70% increase in southbound travel time is forecast between the Ballard Bridge and SR-519 for this alternative. In addition, this alternative would mix truck traffic destined between the BINMIC and the Duwamish areas with significant pedestrian, bicycle, and tourism traffic along a signalized surface arterial. These are not acceptable conditions to replace the existing regional transportation facility and we cannot support this alternative.

7. **NSIA cannot support the Bypass Alternative because of its detrimental effect on traffic to and from Ballard/Interbay.** The DEIS documents that the Bypass-Tunnel Alternative would also result in a loss of capacity, additional travel delay, and congestion particularly for trips destined to and from the Ballard/Interbay (BINMIC) areas. The results reported for the freight measure of effectiveness (MOE FT1) also indicate that connections will be degraded. A 62% increase in southbound travel time is forecast between the Ballard Bridge and SR-519 for this alternative. In addition, this alternative would mix truck traffic destined between the BINMIC and the Duwamish areas with significant pedestrian, bicycle, and tourism traffic along a signalized surface arterial. These are not acceptable conditions to replace the existing regional transportation facility and we cannot support this alternative.

C-011-006

8. **The FEIS should define alternate routes for flammable and hazardous materials transport, particularly during construction AND if either the Tunnel or Bypass Tunnel Alternatives are selected.** The DEIS states that flammable and hazardous (including combustible) materials are and would continue to be prohibited in the Battery Street Tunnel for all alternatives. It also states that, for the Tunnel and Bypass-Tunnel Alternatives, flammable and hazardous materials could be prohibited in tunnel sections. Since flammable materials are currently permitted on the existing viaduct and since hazardous materials are permitted during off-peak hour, the DEIS should provide analysis and discussion about alternative routes for and impacts of removing these trips. Alternative routes should be designated and where necessary, appropriate mitigation (such as signage and turn radii improvements) should be identified.

C-011-007

9. **Construction planning must more thoroughly coordinate with other major projects, not just the Monorail project.** Page 291 of the Transportation Discipline Report notes that the Seattle monorail project is not expected to be complete until 2009 and the viaduct construction could begin in 2008. During 2008 and 2009 "there could be a short period where there are possible conflicts with project traffic detour plans and other construction processes." There could be a plethora of other transportation construction projects occurring during this period including projects on Interstate 5, City of Seattle streets, Sound Transit light rail or commuter rail lines, and the Washington State Ferries terminals. Detailed planning among all potential stakeholders should be evaluated during subsequent phases of project development to identify conflicts among all construction projects and identify appropriate mitigation strategies.

C-011-006

Transporting flammable or hazardous materials would be prohibited in the bored tunnel. Operators hauling these types of materials would need to use I-5 or Alaskan Way.

The project team is committed to working with the freight community and the City to define alternative routes and appropriate mitigation for the construction period. These are addressed in the Final EIS Appendix C, Transportation Discipline Report. In addition, WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

C-011-007

Chapter 6 in the Final EIS discusses other major construction projects in the downtown area that may overlap with the Alaskan Way Viaduct construction schedule. Since the Draft EIS was published in 2004, the Seattle Monorail Project has been cancelled and the Seattle Ferry Terminal Project has been delayed. The Alaskan Way Viaduct Replacement Project will continue to coordinate with the other major construction projects in the area.

C-011-008

10. **The FEIS must thoroughly evaluate truck detours and alternative routes during construction.** Based on the DEIS, construction of three of the alternatives would close the Elliott Avenue/Western Avenue ramps to the SR-99 corridor for between 24 months and 114 months. The detour route for trucks along Alaskan Way would have one lane in each direction. Two of the alternatives would never replace these ramps (see comment 1 above). As pointed out in the DEIS, there are no reliable alternative routes for most trucks through Seattle. Delay, pedestrian/bicycle conflicts, and rail crossing conflicts along the Alaskan Way surface street reduce speeds and reliability for trucks along this route. Heavy congestion on I-5 persists for much of the day. Trucks larger than 27 feet are currently prohibited from Downtown Seattle streets north of King Street between 6:00 A.M. and 6:00 P.M. As a result, alternate truck routes must be designated and local truck-route improvements must be included as mitigation for construction-related impacts. The possibility of changing the downtown truck restrictions should also be evaluated.
11. **Construction should be allowed to occur 24-hours per day.** All future analyses and planning for the selected preferred alternative should continue to assume construction would occur 24-hours per day, 7-days per week. Due to the extreme hardship that construction detours and closures will cause, the construction period needs to be as short as possible. While we understand the local impacts of 24-hour construction impacts, the larger region-wide impacts of halting construction for any period of time would far outweigh the local impacts.
12. **Construction phasing should address most vulnerable sections of viaduct first.** To the extent possible, the most vulnerable sections of the viaduct structure should be replaced first. We recognize the constraints of construction phasing, and understand the current construction plans include rehabilitation of the Battery Street Tunnel early in the construction process. However, for the selected Preferred Alternative, the Final EIS should detail an alternative construction plan that would allow the project to replace those sections most vulnerable to seismic failure as early as possible.
13. **Economic and business losses during construction should be factored into the decision for the preferred alternative.** The cost figures provided for each alternative do not appear to account for the significant cost elements associated with the variation in construction time. Decision makers should be provided with estimates of the cost to the local economy of each alternative's construction impacts. For example, the Aerial Alternative would require between two and four year longer to build than the other alternatives. This additional construction time would extend by up to 50% the significant operational and economic hardships compared to the other alternatives. These additional costs should be fairly presented.
14. **The project area should not include the area of SR 99 north and east of the Battery Street Tunnel.** This area more appropriately should be part of the transportation studies for the South Lake Union/Mercer Corridor Area.

C-011-009

C-011-010

C-011-008

FHWA, WSDOT, and the City of Seattle are committed to working with the freight community to develop alternative freight routes and strategies to address freight concerns during the construction period. The project has identified a number of strategies designed specifically for freight, in addition to the strategies designed to reduce travel demand and mitigate traffic congestion. All strategies identified for freight and general traffic will be in place prior to major construction. Chapter 8 of the Final EIS and Appendix C, the Transportation Discipline Report, also discuss the effects and mitigation for freight during construction.

The construction plans for all alternatives assume construction could occur up to 24 hours a day, 7 days a week. The lead agencies must balance the construction schedule with the transportation needs in the corridor when deciding how long SR 99 will be completely closed during construction. Not all types of construction activities would be allowed 24 hours a day. For example, as part of the mitigation measures associated with the noise variance permit, the noisiest construction activities will likely be limited to daytime hours. Please refer to the Final EIS and Appendix C, Transportation Discipline Report for details about the temporary construction effects and mitigation for traffic.

C-011-009

These economic and business effects have been taken into consideration during all phases of the project design and development of construction sequencing, along with other environmental effects. These effects and mitigation measures for the current alternatives are described in the Final EIS and Appendix L, Economics Discipline Report. The project team will continue to work with businesses throughout the construction process.

C-011-010

The project area that is slightly north and east of the Battery Street

Sincerely,
North Seattle Industrial Association


Eugene Wasserman
President

Preserving and protecting North Seattle's unique and diverse industrial heritage and resources for everyone

Tunnel is part of the project because it is an important part of the transportation system that connects SR 99 to both the viaduct portion of SR 99 and local streets. Two purposes of the project as stated in the purpose and need statement are to:

- Provide capacity for automobiles, freight, and transit to efficiently move people and goods to and through downtown Seattle, and
- Provide linkages to the regional transportation system and to and from downtown Seattle and the local street system.

This includes access to and from downtown, which is provided by connections made north of Battery Street Tunnel. Therefore, these areas are part of the same corridor from a transportation planning perspective.



May 15, 2004

Ms. Allison Ray
Alaskan Way Viaduct project
999 Third Avenue – Suite 2424
Seattle WA 98104

RECEIVED
JUN 01 2004
AWWSP Team Office

SR-99 Viaduct and Seawall Replacement – Comments on Draft EIS

Dear Ms. Ray:

The Duwamish Planning Committee has been meeting with the Alaskan Way Viaduct Design Team for the past three years. We have evaluated the various proposals for reconstruction of the Viaduct and its arterials. It has become increasingly apparent that all of the alternatives currently under consideration have significant negative impacts on transportation and freight mobility within the Duwamish Manufacturing and Industrial Center. The severity of these impacts are highly dependent on the preferred alternative that emerges from the final EIS and the design details of the finalized project. The only viable alternative delineated in the Draft EIS is a variation of the cut and cover tunnel. Our major areas of concern have been expressed to the design team during our meetings and are delineated below.

- C-012-001**
- The planning and design process for the SR-99 Viaduct demonstrates the lack of coordinated regional transportation planning in the Seattle area. The preliminary designs for this project were developed without referencing the Duwamish Manufacturing and Industrial Plan, or integrating its transportation priorities. The design alternatives described in the Draft EIS fail to adequately address the interface of SR-99 with other major arterials and proposed transportation projects in the area. These include, but are not limited to, both phases of the SR-519 Project, the Spokane Street Viaduct Project and the connection to Interstate 5 via SR-509.

C-012-001

The Alaskan Way Viaduct Replacement Project team has been and continues to coordinate with other projects in the area throughout the design process to ensure that viaduct plans effectively interface with current design plans for other projects (including SR 519, S. Spokane Street Viaduct, and SR 509).

Several projects, such as S. Spokane Street Project, are included in the updated regional 2030 baseline model used for the Final EIS transportation analysis. Other projects that had uncertain plans, timelines, or did not have funding sources were not specifically described in the EIS because of their uncertainty. Please refer to the Final EIS for updated information.

- C-012-002** • This Alaskan Way Viaduct a vital freight corridor servicing industrial and warehousing operations in Seattle's two designated Manufacturing and Industrial Centers. The Duwamish and Ballard Interbay M and I Centers are home to more than 4500 businesses and 80,000 employees. The viability of these businesses depends on an efficient and functional transportation infrastructure. Boeing attempted to make this point for years before relocating its headquarters to Chicago. In a DPC survey of businesses that had moved out of the Duwamish, transportation congestion and impeded access were repeatedly cited as primary reasons. It is imperative that any Preferred Alternative preserve the existing capacity provided by SR-99. It is also important that the project be designed to enhance and not impede access to local businesses.
- C-012-003** • The SR-99 Surface Street alternative, as described in the Draft EIS, is unacceptable. It would significantly reduce the through capacity of the corridor and exacerbate our regional transportation problems. It would also generate increased congestion on Interstate 5 and all local arterials.
 - The Bypass Tunnel, as described in the Draft EIS, is unacceptable because it would sever the vital connection between the two designated M and I Centers, the Duwamish and Ballard InterBay (BINMIC). This would force an excessive amount of truck and commercial traffic onto local streets and arterials, increasing delivery times and operational costs for industrial businesses.
- C-012-004** • The elimination of access ramps in the area of the downtown office core will have a significant impact on the North Duwamish. Without these ramps and the access that they currently provide, increased commuter traffic will be channeled into the Duwamish M and I Center from Michigan Street, north. This will increase congestion on already crowded arterials, making access to local businesses more difficult and lengthening transit times for freight deliveries. The proposed design alternatives described in the Draft EIS seem to favor the Central Business District at the expense of industrial and manufacturing operations.
 - The proposed addition of a Northbound off-ramp at or near Atlantic Street is another significant concern. After detailed review by our team of transportation consultants, this proposed ramp was removed from the approved project list in the Duwamish Manufacturing Industrial Center Plan. This ramp will dump an excessive amount of vehicular traffic onto the surface streets in an already congested area. Many of these vehicles will be seeking a direct link from Highway 99 to the I-5 and I-90 corridors. This ramp provides no significant benefits to industrial businesses or property owners, yet it will significantly impact freight mobility in the area.
- C-012-005** • The impacts of this project on the properties and businesses located north of Holgate and west of First Avenue needs to be analyzed in detail. All of the proposed alternatives severely restrict access and egress to and from these businesses and make freight deliveries virtually impossible

C-012-002

The project has been designed to accommodate freight movements due to its importance as a freight corridor. A discussion of traffic effects to all travelers, and specifically freight, is discussed in the Final EIS.

C-012-003

The Surface and Bypass Tunnel Alternatives have been dropped from consideration because they did not meet the project's purpose. Both alternatives would have caused substantial increases in travel times and congestion.

C-012-004

Relocation of the downtown ramps from Seneca and Columbia Streets to King Street is not expected to increase traffic in the North Duwamish area. Traffic that currently uses the existing downtown ramps at Columbia Street and Seneca Street is expected to travel further south along city streets (such as Alaskan Way) to access the new SR 99 ramps at in the stadium area. Traffic is not expected to divert further south than the new stadium area interchange. Traffic modeling indicates that these new ramps could actually slightly decrease traffic on arterials routes south of the stadium area downtown since they provide additional access to the south downtown area.

The referenced northbound off-ramp at S. Atlantic Street has been moved to Alaskan Way at S. Dearborn Street. This strategy was included in the final design of the S. Holgate Street to S. King Street Viaduct Replacement Project.

C-012-005

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the

C-012-006

- Any design option for the Viaduct must adequately address its interface with both Phase One and Two of the SR-519 Project. Current proposals to redesign Phase Two of the SR-519 Project and eliminate the west bound offramp are unacceptable. The full couplet design for the SR-519 Project functioned efficiently because it distributed traffic evenly over a larger area, channeling access and distribution through a greater number of intersections. During our committee's work on the Duwamish M and I Center Plan, all of the analysis done by our transportation consultants showed that the full benefits of the SR-519 Project would not be realized until both phases were completed. Phase one alone has a greater negative impact on freight mobility and access to local businesses because it channels significant volumes of commuter traffic further south into the industrial zones, clogging arterials and degrading levels of service at key intersections. The intersection at First and Atlantic has become increasingly congested since the opening of Phase One of the SR-519 Project. The right-of-way on Atlantic Street is considerably narrower than that on Royal Brougham and can not be expected to handle the volumes of traffic that are being projected. Every traffic forecast that we have seen indicates that the service level of this intersection will continue to degrade as the area develops.
- The elimination of proposed improvements in the connections of the Viaduct to Spokane Street create additional impacts for Duwamish businesses, as well as freight mobility. The elimination of adequate Westbound access to the Spokane Street Viaduct will significantly increase congestion North of Spokane Street. The current configuration of the Spokane Street Viaduct project will force truck and delivery vehicles to travel North to Lander Street, West on Lander, and then South on First Avenue to access the Westbound lanes of the Viaduct. This circuitous route will add significantly to the levels of traffic between Spokane and Lander Streets. The current design for the Spokane street Viaduct is nine years old. It was developed before either of the sports stadiums were constructed and well before the SR-519 Project was designed. The design for Spokane Street is obsolete. It does not interface adequately with the SR-519 Project or the Viaduct alternatives as described in the EIS.

C-012-007

- Considering the potential commercial development in South Downtown, the section of the viaduct between Jackson and Holgate streets is critical. Since Safeco Field and the Seahawks Stadium and Exhibition Center opened, traffic congestion in this area has increased significantly. As the economy improves and development increases within the Stadium Transition Zone, these traffic problems will be exacerbated. The new I-C Zone surrounding Safeco Field provides the capacity for 3 million square feet of office and commercial development. To date, the SDOT traffic models have failed to take these land use actions into account. It is imperative that viaduct planners take future development in this area into consideration. This may require modifying the City traffic analysis software to evaluate the impact of significantly increased density on transportation in this area.

extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

C-012-006

Construction for the SR 519 project is complete. With the SR 519 Project, WSDOT improved connections for traffic heading to the Port of Seattle terminals, Colman Dock ferry terminal, central waterfront area, sports stadiums, and destinations in Seattle's SODO neighborhood. SR 519 improvements separate car, freight, pedestrian, and rail traffic to help improve mobility, pedestrian safety and reduce the risk of collisions. All major work was completed before the start of construction to replace the Alaskan Way Viaduct between S. Holgate and S. King streets.

The City of Seattle designed the South Spokane Street Viaduct Widening Project in 1995 and has been implementing it in phases due to funding availability. Major portions of this project are under construction and the project is scheduled to be complete by May 2012. Please see the project's website for more details:

<http://www.cityofseattle.net/transportation/spokanestreet.htm>

C-012-007

Land use assumptions used for the Alaskan Way Viaduct Replacement Project traffic models, including forecasted growth in households and employment, is based on the most current information provided in the Puget Sound Regional Council's Metropolitan Transportation Plan (2030) and the City of Seattle's Comprehensive Plan.

Model assumptions were updated for the Final EIS. Details regarding

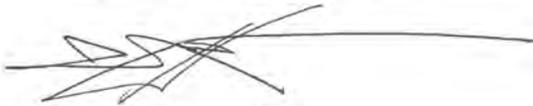
C-012-008

• The design of this project in the vicinity of SAFECO Field and Seahawks Stadium needs to be reexamined. The Port of Seattle is committed to the long term use of Terminal 46 as a container facility for Hanjin. This requires access to the north SIG yard as well as to I-5 and I-90 via SR-519. The design alternatives currently under consideration do not address the long term requirements of the Port, nor do they provide adequate access to businesses and properties in the vicinity of the project. The ideal solution to the complex issues in this area would seem to be an extension of the cut and cover tunnel south to Holgate Street. This option was investigated earlier in the design phase, but was rejected as too costly. We believe that the extension of a tunnel through this area has merit and should be reexamined. It solves the east west access issues and provides a much broader range of options for future development in the area. We need only look to Boston for a catalog of innovative transportation solutions. The Ted Williams Tunnel, the Charles River Bridge, tunnel jacking, advanced soil stabilization techniques and collaboration with Japanese and European engineering firms are setting standards for the next century. While Boston is developing a world-class transportation infrastructure, Seattle is mired in cost conscious political expediency. Effective long term solutions may be more expensive initially, but short-term fixes will cost considerably more over the long term.

C-012-009

• Budgeting for the mitigation of Viaduct construction impacts must adequately account for the length of construction and the severity of these impacts on local businesses. The City must also develop a comprehensive plan to address the alternative routing of freight and oversized vehicles during the construction period.

Any replacement for the viaduct must maintain or expand existing capacity and access, anything less will create additional transportation problems which will have to be faced in the future. It must also address the reconstruction of the crumbling sea wall which supports the viaduct itself. The only current alternative that addresses all of these issues is the cut and cover tunnel. It opens up Seattle's waterfront, simultaneously replaces the seawall and — most importantly — preserves capacity. The City and State have been exploring every option to reduce the costs of this project. We are concerned that these agencies are in such a rush to fund and initiate construction that they are willing to settle for an inadequate alternative which creates more problems than it solves.



David Huchthausen - Chair

Duwamish Planning Committee

these updates can be found in the Transportation Discipline Report (Appendix C) of the Final EIS.

C-012-008

The lead agencies have coordinated continuously with the Port of Seattle with regard to the Port's operations and facilities along the waterfront, particularly the Terminal 46 container terminal facility currently under lease to Hanjin. The design team has also coordinated continuously with the railroads, recognizing the importance of maintaining viable freight access to the SIG railyard, and of keeping the BNSF tail track operational.

A tunnel extending as far south as Holgate Street was examined much earlier in the process, and was ultimately screened out for various reasons, including cost. This cut-and-cover tunnel involved a Utah Avenue S. alignment that was investigated as part of several of these earlier concepts. Several flaws eliminated this possibility:

1. The Utah Avenue alignment was unlikely to be compatible with the existing S. Spokane Street interchange, as well as the existing First Avenue S. ramps to and from S. Spokane Street. This could require a complete reconstruction of these two areas.
2. A Utah Avenue S. alignment would also make a grade separation of S. Atlantic Street and S. Royal Brougham Way infeasible.
3. To allow local access, a Utah Avenue S. alignment would probably be on an aerial structure from S. Spokane Street to the stadium area, adding significant costs to the project.

The design of the south end of the project corridor is a result of attempting to carefully balance the needs of freight mobility both in general and with regard to the Port's container terminal facilities, stadium event traffic, and pedestrian safety and connectivity. Please see the

Final EIS for the current configuration of the south end of the project for each proposed build alternative.

C-012-009

Current cost estimate and future financing include mitigation measures to protect and support local businesses. These measures, and their costs, will be refined as project planning and development continues. Alternative routes for freight and oversized vehicles will be provided during all phases of construction.

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Chief Executive Officer

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SEATTLE AQUARIUM SOCIETY

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May 12, 2004

Ms. Allison Ray
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

RE: Draft Environmental Impact Statement:
SR 99 Alaskan Way Viaduct and Seawall Replacement Project

Dear Ms. Ray:

On behalf of the Seattle Aquarium Society, we write to offer comment on the SR 99 Alaskan Way Viaduct and Seawall Replacement Project Draft Environmental Impact Statement. Our general comments are based upon the same funding assumption used for the Draft EIS, i.e. that funding is committed for the total project at the beginning, allowing the most efficient staging and shortest time to completion. The availability of funding may affect construction sequencing, which, in turn, may affect the impacts on the Aquarium. For example, if funding availability required that the Seawall be constructed earlier than the Viaduct replacement, this could impact the Aquarium. With this caveat, we favor alternatives, and their appropriate financing stream, that can be sequenced in such a way that allows the business of the Seattle Aquarium to successfully endure and survive. Through the entire process, the Aquarium must be made whole from operating disruptions.

We strongly support the Tunnel Alternative for the SR 99 Alaskan Way Viaduct and Seawall Replacement Project. While we do not support the Bypass Tunnel, we find it preferable to the Rebuild, Aerial and Surface Alternatives, all of which we oppose.

Standing and Institutional Interest

The Seattle Aquarium Society represents 20,000 member families throughout Seattle and King County and is the official not-for-profit support organization for the Seattle Aquarium. The Aquarium is located squarely in the middle of the Seattle Central Waterfront at Piers 59 and 60. Our concern is the preservation and enhancement of the Seattle Aquarium as a core cultural resource for the region and as a major tourist/economic driver for the Central Waterfront. The Aquarium is the region's leading marine conservation educational institution and one of the City's top visitor attractions. The Aquarium attracted 660,000 visitors during 2003, generating a combined Aquarium/Society operating budget of \$7.4 million with a payroll of 72 FTE. Roughly one-third of Aquarium visitors come from Seattle, a third from the broader region, and a third from outside the State. Plans are being prepared for significant near-term capital investment in the existing Pier 59 facility, and, further out, major capital investments that will ultimately create one of the world's great aquariums on Piers 59 and 60.

C-013-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments and recognize your preference for the 2004 Cut-and-Cover Tunnel Alternative. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative. If this alternative is selected, the City of Seattle would replace the seawall under another project, called the Elliott Bay Seawall Project.

The lead agencies plan to maintain access to businesses throughout construction. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project will continue its coordination and mitigation activities with businesses and other affected parties in the project area.

Primary Evaluation Considerations

C-013-002

1. Survival of the Aquarium depends upon convenient visitor access.

Access to the Waterfront – Vehicular and Pedestrian

- Families: Aquarium visitors come, for the most part, in multigenerational family groups, often with young children (walking, automobiles, public transportation). Automobile access, including parking in close proximity to the Aquarium, is a key factor for family groups.
- Students: 43,000 students arrive annually at the Aquarium in class groups via 500 school buses. Students, many of elementary school age, must be able to load and unload in close proximity to the Aquarium for safety reasons, and buses must have locations for waiting during the school visit.

C-013-003

2. Integration of the Waterfront with the City

- For 50 years the Central Waterfront has been cut-off from the economic life and traffic pattern of the City. Baltimore's Inner Harbor and National Aquarium illustrate the powerful impact an integrated waterfront can make on the City, especially the downtown businesses, property owners, and tourism. New Orleans offers another example of a positive waterfront redevelopment on city growth and vitality, again featuring a national caliber aquarium as a key feature.

3. Effective Restoration of the Seawall

- The Seattle Aquarium, on Piers 59 and 60, sits adjacent to the Seawall. The survival and structural integrity of the Aquarium depend upon early replacement of the Seawall in a manner that protects the piers' structural integrity.

4. A Visitor-friendly Environment

- As an attendance-supported institution, the Seattle Aquarium depends upon an overall waterfront environment that is safe, welcoming to local residents and attractive to visitors from the State, United States and foreign nations. The Port of Seattle has enhanced the northern part of the waterfront in the past decade, with positive economic and aesthetic results. Much remains to be done for the waterfront to achieve its potential and to become a world class environment, bringing with it substantial economic and social returns. The pedestrian experience on the Central Waterfront should receive high priority, with an emphasis on the creation of a widened promenade along the waterfront, creating a new sense of public space to which the Seattle Aquarium will contribute.

C-013-004

5. Marine Conservation Learning Opportunities

- We believe there may be opportunities in the construction process and new shoreline design to extend our marine conservation mission. We offer this up as a resource to the City, State, Port and other property owners, in developing ways to enhance public understanding of Elliott Bay, Puget Sound and our connection to the oceans.

C-013-002

The lead agencies have taken this information and these needs into consideration as part of our construction and mitigation planning effort. Additional information related to construction effects and proposed mitigation is discussed in the Final EIS. In addition, we will continue discussing construction details and issues with the Aquarium and other affected landowners and tenants throughout project construction. Access will be maintained during viaduct removal. Primary pedestrian routes would have signage, directional arrows, lighting, and other amenities. All pedestrian routes would provide safe and clean access through the construction zone.

C-013-003

If the preferred alternative is selected, the City of Seattle would be responsible for the development of the central waterfront under a separate project. Likewise, if the preferred alternative is selected, the City of Seattle would replace the seawall under a separate project. There will continue to be opportunities for the public to participate in that planning effort and to help determine the future of their waterfront as the City moves forward with its projects.

If either the Elevated Structure Alternative or Cut-and-Cover Tunnel Alternative is selected, the seawall replacement and design of the Alaskan Way surface street would be part of those alternatives.

C-013-004

Thank you for your offer. The Bored Tunnel Alternative (the preferred alternative) does not include the seawall as a project component. However, if an alternative is selected that incorporates replacement of the seawall, we will consult with you at that time.

Ms. Allison Ray
Alaskan Way Viaduct and Seawall Replacement Project Office
May 12, 2004 (Page 3)

Mitigation Impact

C-013-005

We are concerned about the following issues during the construction process, and look to detailed discussion regarding mitigation. The parking question extends beyond the construction period and must be accommodated in the post-construction framework as well:

1. Access during construction, pedestrian and vehicular. Ability of the Seattle Aquarium to maintain its \$7 million annual operating budget with minimal City operating subsidy. To the extent there is a significant revenue shortfall, mitigation should make up the difference. The Aquarium's operations are funded primarily through:
 - Admittance (660,000 visitors in 2003),
 - Membership fees (20,000 active member families)
 - Facilities rentals (events ranging from weddings and school proms to business receptions and conferences), and
 - Concessions revenues (Steamer's Seafood Cafe, IMAX Theater, Seattle Aquarium Store).
2. Parking Availability. A majority of Aquarium visitors arrive, as family groups, in private automobiles. They must perceive that they can get to the Aquarium by car, and park within reasonable walking proximity to the facility.
3. Operational Disruption. Ability of the Seattle Aquarium to continue its 24 hour/day, 365 day/year operation for visitors and for its unique (and fragile) living animal collection. The health and safety of our visitors and animals are our foremost concern.
4. Construction Staging. We understand that some of the plans contemplate staging areas directly across from the Aquarium. We are concerned about the implications of this plan for the safe and successful operation of the Aquarium.

Comments on Alternatives

C-013-006

1. Preferred Alternative: Tunnel. Strongly support. We urge that the tunnel rise to the surface beyond the northern sight-lines of the Aquarium in order to minimize traffic noise and also provide for potential public open space adjacent to or across from the Aquarium.
2. Other Alternatives.
 - Rebuild and Aerial: Strongly oppose both aerial alternatives because of their enormous negative impact on the City, the Aquarium and all activities on the Central Waterfront. The City has a once-in-a-century opportunity to correct a major error - we must take it.
 - Bypass Tunnel: Oppose; but prefer over both aerial options and Surface Option, Less damaging to Central Waterfront than these options, but fails to optimize the opportunity for the Central Waterfront. Serious traffic flow and access problems for the Aquarium.
 - Surface: Oppose. Separates the Aquarium and Central Waterfront from the City with a vast vista of concrete, traffic and noise. Major access problems for vehicular and pedestrian traffic; safety issues for school children and families with young children, who comprise a large portion of the Aquarium's audience.

C-013-005

The lead agencies plan to maintain access to businesses throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. The lead agencies recognize that businesses along the central waterfront rely on the short-term parking in the area. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. No long-term staging is proposed for the Bored Tunnel Alternative in the vicinity of the Aquarium. There may be temporary staging within the City of Seattle right-of-way during viaduct demolition and removal.

C-013-006

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

Ms. Allison Ray
Alaskan Way Viaduct and Seawall Replacement Project Office
May 12, 2004 (Page 4)

The Viaduct/Seawall project offers the opportunity not only to solve safety and transportation problems, but to return the Central Waterfront of Seattle to its historic importance. The Seattle Aquarium physically occupies the center of the Waterfront, and symbolically represents the City's connection to the sea. We are enthusiastic partners with you in this challenging process.

Sincerely,



Paul Kundtz, President
Board of Directors

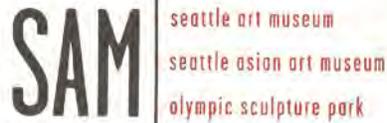


Gary T. Smith
Vice President, Public Partnerships



Robert W. Davidson
Chief Executive Officer

cc: Hon. Gary Locke, Governor, State of Washington
Hon. Greg Nickels, Mayor, City of Seattle
Seattle City Council
King County Council
Ken Bounds, Seattle Superintendent of Parks
Bill Arntz, Seattle Aquarium Director



May 26, 2004

Allison Ray
WSDOT Environmental Coordinator
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Ray:

C-014-001

On behalf of the Seattle Art Museum we are pleased to be able to offer the following comments of the SR 99 Alaskan Way Viaduct and Seawall Replacement Project Draft Environmental Impact Statement. While we acknowledge the perceived necessity of this project, we also realize the once-in-a-generation opportunity to offer historic vision to unite Seattle's Central Business District with its Waterfront.

We believe that we can revitalize the Waterfront, increase opportunities for people and goods to move through Seattle in a systemic way, and simultaneously improve our economy and environment. It is through this visionary leadership that our next regional legacy can be created.

As a major cultural institution in Seattle, active since its creation in 1933, the Seattle Art Museum has sought to instill legacy leadership in major civics work projects. We believe the Alaskan Way Viaduct/Seawall replacement project to be such a project.

For 50 years the central Waterfront has been cut off from the economic life and traffic flow of the Central Business District. It is precisely this concern that has led SAM to design and develop the new Olympic Sculpture Park. It will transform a former industrial property into a vibrant new 8.5-acre park for art and people that is located at the northern end of the seawall and within the heart of Seattle's most urban neighborhood.

Located in Belltown, along the shore of Elliott Bay between Broad and Bay Streets, and eastward to Western Avenue the new open space will provide shoreline enhancement that improves public access to Elliott Bay and provides shoreline restoration so needed for migrating juvenile salmonids. Scheduled for groundbreaking in February 2005, the park

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seattle asian art museum | 1400 East Prospect St. Volunteer Park, Seattle, WA 98112-3303 TEL 206 625 8900 FAX 206 654 3191
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www.seattleartmuseum.org

C-014-001

The lead agencies appreciate your organization's efforts to coordinate with the project. The Olympic Sculpture Park was discussed in the 2004 Draft EIS, and it is considered an existing condition in the Final EIS. The underpass at Broad Street that was analyzed in the 2004 Draft EIS is not proposed as part of any of the build alternatives evaluated in the Final EIS. The Battery Street Flyover Detour is also no longer proposed.

During construction, the preferred Bored Tunnel Alternative does not propose using the Broad Street Detour. The Bored Tunnel Alternative minimizes SR 99 closures and restrictions to a greater degree than the alternatives evaluated in the 2004 Draft EIS. Construction of the Cut-and-Cover Tunnel and Elevated Structure Alternatives continues to require substantial SR 99 closures and lane restrictions. During construction, the Cut-and-Cover Tunnel Alternative does not require use of the Battery Street Detour; however, the Elevated Structure Alternative does propose to use the Broad Street Detour. This detour requires constructing a temporary trestle crossing over the railroad tracks at Broad Street and Alaskan Way.

An updated description of the proposed alternatives, their effects, and proposed mitigation is provided in the Final EIS.

C-014-001

location has already become an anchor for new development that will provide homes and a source of jobs for many. The project will substantially strengthen Seattle's waterfront tourism industry, and is expected to draw an estimated 600,000 visitors per year.

The new Olympic Sculpture Park will represent a considerable alteration to the landscape while at the same time incorporating the transportation infrastructure and safe pedestrian access to the Waterfront. The new park will link together three separate sites now divided by Elliott Avenue and the BNSF tracks. Since this new park will be opening free of charge to the public in 2006 – prior to any proposed viaduct construction commencing in 2008 – its presence should be more substantially considered in the Final EIS.

Accordingly, both proposed detours for SR 99 traffic – Broad Street Detour and Battery Street Flyover Detour – would pose considerable violations to pedestrian access and neighborhood connection to this newly completed major civic project. We would urge the FEIS to figure out how to divert traffic to create a publicly accessible and people-friendly waterfront prior to 2020, and to take advantage of the opportunity offered by the Olympic Sculpture Park that will showcase the natural and aesthetic elements of the State: its environment, its art, and above all its civic community commitment.

One particular feature of the Broad Street Detour – referred to as the Broad Street underpass beneath the railroad tracks – should be dropped in the FEIS.

During the fall of 2003, this element of the viaduct was thoroughly considered, analyzed, and determined to be inefficient, expensive and ultimately not necessary by the City/State Alaskan Way Viaduct team. That lengthy process, directed by Maureen Sullivan, determined that it was cheaper and more traffic-efficient to replicate the underpass with improved ramps at Elliott and Western. Accordingly, the FEIS should not assume the underpass as a pre-existing condition to construction. Rather, the FEIS should assume the 8.5-acre Olympic Sculpture Park at the north end of the seawall as a pre-existing park.

Sincerely,



Mimi Gardner Gates, Director



RECEIVED
JUN 07 2004
AWVSP Team Office

AWV Project Office
Allison Ray
999 Third Avenue, Suite 2424
Seattle, Washington 98104

June 1, 2004

Dear Ms. Ray,

Historic Seattle, chartered in 1974 to protect Seattle's architectural heritage, would like to comment on the draft environmental impact statement for the Alaskan Way Viaduct project. The problem of replacing the viaduct presents a great opportunity for the city as it envisions plans for a new and improved waterfront. Our organization recognizes the hard work of Allied Arts of Seattle and the City of Seattle over the past few years as leaders in a public discussion about what our waterfront might be.

Historic Seattle has also been concerned about the future of the waterfront and the way in which its significant heritage will be recognized within waterfront plans, and within alternatives for the viaduct.

We support alternatives that better connect the city to the water, especially in areas such as Pioneer Square and Pike Place Market whose historic relationship to Elliott Bay have been blocked by the viaduct and ground level transportation. These historic districts are tourist attractions, economic centers, and play an important role in the identity of the city. Alternatives that incorporate better connections between these places and the water would support historic preservation and the best interests of the city as a whole.

The cut and cover alternative presents an incredible opportunity for preservation and economic development along Alaskan Way. The streetscape of older buildings along Alaskan Way has long been blocked by the physical and visual barrier of the viaduct. If this structure were removed, the water-facing side of these buildings would be well suited for increased business activity and mixed-rate housing. Whatever use these building might take on, their preservation would be significantly enhanced by being able to see them.

C-015-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Through your involvement and assistance developing the Memorandum of Agreement for the project, you have received current information on the subjects raised in this letter. For current information on other subjects, please refer to the Final EIS for current information.

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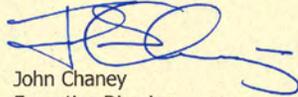
C-015-002

We are concerned about the Washington Street Boat Landing, also known as the Harbor Station Master Building, Pioneer Square's only extant contact with Elliott Bay. It's location and design responds to Alaskan Way. In past ferry expansion discussions, Historic Seattle did not support moving the structure from its current location. This structure, now in poor condition, is planned for removal and reinstallation as a part of all viaduct alternatives. While Historic Seattle strongly supports the thoughtful rehabilitation of this significant structure, we are also concerned about the integrity of Pioneer Square as a historic district – and the district's historic relationship to the water evidenced by the boat landing – within the viaduct plans.

If it is necessary to move the Washington Street Boat Landing from the base of Washington Street, we strongly support careful consideration of the impact this will have on the district. Mitigation for this impact should involve coordination with the Pioneer Square Community Association and other interested parties. Historic Seattle would happily provide assistance in crafting a mitigation plan.

We appreciate your attention to the many details of this project and look forward to the continued development of alternatives for this very important project.

Sincerely,



John Chaney
Executive Director

C-015-002

If the preferred Bored Tunnel Alternative is selected the Washington Street Boat Landing would not be affected by the project's construction. However, if the Cut-and-Cover Tunnel or Elevated Structure Alternative is selected, the Washington Street Boat Landing pergola would be removed during construction and replaced close to its present location, at the edge of the water at the foot of Washington Street. Rehabilitation and relocation of the structure will be reviewed by the Pioneer Square Preservation Board.



King County Labor Council, AFL-CIO

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AWWSP Team Office

June 1, 2004

Mr. Douglas B. MacDonald, Secretary of Transportation
c/o Allison Ray
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

Hon. Greg Nickels, Mayor
City of Seattle
Seattle City Hall
600 Fourth Avenue, 7th Floor
Seattle, WA 98104-1876

Re: Viaduct/Seawall Replacement DEIS Comments

Dear Secretary MacDonald and Mayor Nickels:

Thank you for the opportunity to comment on the *Draft Environmental Impact Statement for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project*. You have both demonstrated tremendous leadership in moving the project to this stage.

The Viaduct is vital to the region's future and we are fully supportive of addressing this critical link in our regional transportation system.

Loss of the roadway capacity and local access provided by the Alaskan Way Viaduct and the surface street—and the railroad mainline capacity that is dependent on the protection of the seawall—would be catastrophic. The region's economic life and well-being depends on the service provided by these facilities. A long-term closure of the corridor would harm commerce and workers.

The Viaduct is vital for the efficiency of cargo terminals operations. Container trade through the Port was 1.5 million 20-foot equivalent units (TEUs) last year. The value of two-way waterborne trade is about \$30 billion per year, which arrives at and departs Seattle primarily via rail and truck, using or passing under SR 99. Operations at Port of Seattle marine terminals support more than 18,000 jobs in the region and generate \$895 million annually in wages and salaries and \$107 million in state and local taxes each year (Martin and Associates report, September 2000). The value of international cargo moving among these areas was estimated at nearly \$100 billion in 1997 (BST Associates report, January 1999). Terminal 46 alone supports 1,366 direct jobs and 2,413 induced and indirect jobs, which provide \$187 million in personal income, and generates \$22 million in state and local taxes plus \$47 million in federal taxes.

Nancy Young, President • Sergio Salinas, Vice President • Steve Williamson, Executive Secretary

AFFILIATED WITH THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS



Our success in competing for container trade is dependent on a functioning regional land-based transportation system that can quickly move containers from ships to their inland destinations via rail or truck. Loss of the Viaduct would devastate our ability to compete for container traffic and puts all of the economic activity generated by the Port's maritime operations at risk. This also underscores the importance of choosing design and construction options that do not impede container operations and ultimately enhance our region's ability to move cargo rapidly.

Our comments on the DEIS are focused on the impact of the Viaduct on cargo terminal operations in particular on Terminal 46.

Access to and use of Terminal 46 must be protected.

C-016-001

- We are concerned that neither the aerial nor surface design option for the south segment, as described in the DEIS, provide for functional container operations. Both of these options, as shown, would take property that is critical to the functionality of T-46 as a container terminal. We are also concerned that the alignment with SR 99 on the surface does not provide adequate access to the facility.
- We encourage and support efforts to modify Viaduct options in order to accommodate T-46's current and future performance levels including:
 - Providing for container drayage trucking (e. g. curve radii, grades, and signals);
 - Ensuring access to the two rail yard gates to the south;
 - Ensuring access to the east to the North SIG Yard and the regional highway system; and
 - Supporting railroad intermodal activity.
- It is imperative that Hanjin Shipping, which operates Terminal 46, be able to operate as they currently do—both during construction and with a replacement facility. Temporary detour facilities, construction staging, detours, and capacity reductions on surface streets could have a profound impact on T-46. Unimpeded access to Terminal 46 for container terminal operations must be a top priority.
- In addition, we strongly urge you to consider modifications to Viaduct options that can assist in joining container terminal and railroad operations in the North Duwamish by reviewing options for rebuilding SR 99 East of its current alignment in the vicinity of Terminal 30. We need to take advantage of every opportunity to improve efficiencies and to keep our container industry a vital, competitive part of our economy for future generations.

Thank you for your consideration and attention to this matter.

Sincerely,



Steve Williamson
Executive Secretary

opeiu8/afl-clo

C-016-001

Viaduct replacement in the area around Terminal 46 has been separated from the Alaskan Way Viaduct Replacement Project through the Moving Forward projects as described in Chapter 2 of the Final EIS. The S. Holgate Street to S. King Street Viaduct Replacement Project provides improved access for freight trucks into and out of the waterfront area, including the area around Terminal 46. Chapter 4, Affected Environment, of the Final EIS Appendix C, Transportation Discipline Report, discusses conditions with the S. Holgate to S. King Street Viaduct Replacement Project in place. For a description of the S. Holgate to S. King Street Viaduct Replacement Project, refer to Final EIS Appendix B, Alternatives Description and Construction Methods Discipline Report.

16633 SE 17th Street
Bellevue, WA 98008

ASCE, Seattle Section Expert Team

May 26, 2004

Allison Ray
Alaskan Way Viaduct and Seawall Replacement Project
999 Third Ave., Suite 2424
Seattle, WA 98104

Dear Ms. Ray:

The ASCE, Seattle Section Expert Team, which has been providing reviews of this project, is submitting comments to the Project Draft Environmental Impact Statement. Our efforts have been primarily in the technical area and our comments are mainly in this area. However, there are some questions about the project that are both technical and of public interest that we are addressing.

General

C-017-001

1. There is a compelling need for this project and it must continue with development even without firm funding for the entire project.

C-017-002

3. A basic guide in the selection of the recommended alternative is that the facility must retain the traffic carrying capacity through this corridor. With funding in question, staged development becomes a more important consideration.

C-017-003

4. Disruption to the activities along the waterfront and traffic using the corridor is a critical issue that will demand that innovative design and contracting procedures be used to minimize the traffic service and economic impacts of this area. For example, off-site manufacture of repetitive structural elements.

C-017-004

5. The consequences of having the viaduct collapse are so profound that everything possible to prevent this from happening is mandatory.

C-017-005

6. We believe that the recent public statements about the corridor being able to serve traffic demand without the viaduct and an expanded transit system is not valid. It is important to answer this comment specifically.

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C-017-001

Changes to the Alaskan Way Viaduct Replacement Project since the Draft and Supplemental Draft EISs are described in Chapter 2 of the Final EIS.

FHWA, WSDOT, and the City of Seattle agree that this project is needed and vital to public safety. The purpose and need for the project is described in Chapter 1 of the Final EIS.

C-017-002

The preferred alternative will maintain the existing vehicle capacity in the corridor. Proposed construction phasing for the project is described in the Final EIS Appendix B, Alternatives Description and Construction Methods Discipline Report, and Chapter 3 of the Final EIS.

C-017-003

The Bored Tunnel Alternative minimizes disruption to the waterfront during construction because the alignment allows the existing viaduct to remain in service until the bored tunnel is brought into service. Repetitive structural elements for the bored tunnel, such as the tunnel lining segments, will be manufactured off-site at a pre-casting yard.

C-017-004

Both the necessity and the urgency of viaduct and seawall replacement is described in the Draft EIS in Chapter 1. The deterioration of both the viaduct and seawall has been well-documented by numerous engineering studies conducted by structural design and seismic experts since the mid-1990s and again following the February 2001 Nisqually earthquake, which necessitated emergency repairs to the viaduct structure. The consequences of collapse of either structure would indeed be dire for the city, and region in terms of possible injury or harm to people, loss of mobility, and associated substantial economic losses.

C-017-006 | 7. The Surface Alternative is not a valid option to serve the travel demand in this corridor.

C-017-007 | 8. It should be emphasized that tunnel construction is inherently more risky than aerial work and should be reflected in the cost estimates.

System

C-017-008 | 1. Cost continues to be a major issue. It seems evident that the City of Seattle and the Port receive the greatest benefit, if added capacity is obtained, as the project does little to help regional travel problems. The selected alternative should be the lowest cost alternative that has the greatest benefit to local and regional traffic.

C-017-009 | 2. It very interesting that only the Surface Alternative has a negative effect on I-5 and only by an increase in the future ADT of 22,000. Travel time increases may be used as a major argument, but if they are "Seattle trips" only, it is not a major regional issue. The lower cost alternatives that give the best reasonable benefits should have the highest consideration as they preserve funding for the many needed regional projects.

C-017-010 | 3. There will be strong local support to rid Seattle of the double deck viaduct and there is merit from a regional tourist perspective to improve the view from the city and enhance the waterfront experience, but are the increased costs justified? The Surface Alternative accomplishes the aesthetic goals, has a short construction period and is lowest cost, but does not have adequate capacity. While the Tunnel may have the greatest advantages, the cost is \$1.3 Billion more than the Surface Alternative. The Bypass Tunnel has reasonable staging potential and maintains capacity, with an added cost over the Surface Alternative of \$600 Million.

C-017-011 | 4. Is it possible to stage construct the Bypass Tunnel such that the West wall (sea wall) could be constructed in such a way that the tunnel could be added in the future? This would get a temporary "Surface Alternative" open to traffic early at a lower cost and allow the Bypass Tunnel to be built when funding becomes available.

C-017-012 | 5. The capacities of Highway 99 north and south of the project are a concern. Are we building a facility that has greater capacity than is needed?

Traffic

C-017-013 | 1. The detailed analysis in the Transportation Appendix provides a great amount of information about individual parts of the Seattle Transportation System, but the analysis does not provide a comprehensive look at the total system effects of each alternative. The information in the analysis gives the travel times from point A to B, as an example, but it does not give the a comparison of the total system travel. This total system information should be available with the traffic models being used.

C-017-005

Many people asked the lead agencies to consider an alternative that would remove the viaduct and replace it with a four-lane surface roadway along Alaskan Way and include transit improvements. Without a host of improvements and modifications, a four-lane Alaskan Way would create even more congestion on I-5 and downtown streets than the alternatives evaluated in the Draft and Supplemental Draft EISs. Transportation studies performed for this project indicate that replacing the viaduct with a four-lane surface street would substantially increase congestion for most of the day and part of the evening on I-5 through downtown Seattle, downtown streets, and Alaskan Way. On downtown streets, traffic would increase by 30 percent; though traffic increases to specific areas like Pioneer Square and the waterfront could exceed 30 percent. With a four-lane roadway, traffic on Alaskan Way would quadruple to 35,000 to 56,000 vehicles per day compared to about 10,000 vehicles today. This traffic increase would make Alaskan Way the busiest street downtown, carrying more traffic than Mercer Street does today. The increased traffic congestion would also make travel times worse for buses, making transit improvements along these streets largely ineffective. Finally, neighborhoods west of I-5 (Ballard, Queen Anne, Magnolia, and West Seattle) would be less accessible and would face longer commute times.

C-017-006

The Surface Alternative has been dropped from consideration, because it did not meet the project's purpose. The alternative would have reduced the roadway capacity by 40 to 50 percent, causing increased travel times and congestion.

C-017-007

Cost estimates produced for the project include a detailed risk analysis in the Cost Estimating Validation Process (CEVP). The project risk analysis recognizes risks of delay and additional cost associated with

C-017-013 Information would be available for total system delay, vehicle-miles and vehicle-hours of travel. This data would allow a better comparison of the alternatives from an operational perspective. Without this detail it is difficult to make a comparison of alternatives. Therefore, it will be hard to convince the public on which alternative is the favored plan.

C-017-014 2. The elimination of the Seneca Street off-ramp and the Columbia Street on-ramp with the tunnel alternative will have a substantial impact on a large portion of the central downtown trips. There will be increased operating costs for these commuters and will put additional traffic on the surface street system causing increased congestion and delay for the trips that are already traveling these routes.

C-017-015 3. There are concerns about the reduction in capacity and consequent increase in travel times resulting from the surface alternative. The tradeoff between loss of capacity and gain in "view" from the waterfront area is a political question. It is likely; most of the users of the north-south corridors through downtown would prefer the capacity provided by the other alternatives.

C-017-016 4. What is the comparison between the alternatives related to the Port of Seattle access? Travel time from essential port facilities to I-5 and I-90 is very important in the competitive climate of West Coast ports.

Geotechnical Issues

C-017-017 1. Being a DEIS, there is a lack of detail regarding engineering issues. We continue to be concerned that Design Team is taking too conservative an approach to the earthquake-induced deformation response of the soils and the depth and lateral extent of soil improvement requirements. The final design should consider the risks of a less conservative approach.

C-017-018 2. We have a question regarding the impact of tunnel construction and soil stabilization on the buildings to the east. Most of these buildings are pile supported and not likely to experience displacement, but the integrity of the older pile foundations is questionable. For example, the piles supporting the Compass Center at Washington Street settled and detached themselves from the superstructure at some point in the past.

C-017-019 3. With the ground improvements behind the existing seawall (assumed to be jet grouting forming a soil plug), will the improved soil act as a barrier to ground water flow from upland? Are there contaminants in the ground water; and if so are there provisions for ground water collection, pumping, treatment, and disposal?

C-017-020 4. Will the jet-grouted soil be strong enough to replace the removed sheet pile wall between S. King Street and S. Washington Street and the removed upper portion of the gravity seawall between S. Washington Street and Madison Street? Will the improved soil fracture during an earthquake, thereby affecting the strength of the soil and the seawall?

3

constructing a cut-and-cover waterfront tunnel. It's worth noting that the Elevated Structure has some unique risks, too, for example, those associated with rebuilding the structure while maintaining traffic on it.

C-017-008

Costs are clearly an important factor in selection of the preferred alternative, as are benefits to local and regional traffic. However, these are not the only considerations that enter into the selection process. The project must also be considered as an integral part of Seattle's central waterfront. Construction impacts are also a very important factor. These have all been integral to the lead agencies' decision-making process.

C-017-009

Increasing the number of vehicles on I-5 is considered a regional issue, since many I-5 users are longer-distance, regional trips. Forecasting traffic increases on I-5 is an inexact process, and the estimate of 22,000 additional daily trips (about 20 percent of current AWW users) also takes into consideration the possibility that a number of AWW trips may not shift to alternate routes, but could instead make other changes in travel behavior (different destination, change mode, eliminate trips, etc.). Should changes in travel behavior be less than implied by the forecasts, then the impacts to I-5 could be greater. Conversely, even greater changes in travel behavior could result in somewhat lesser impacts to I-5.

Travel demand model forecasts indicate that each of the three build alternatives evaluated in the Final EIS would result in less traffic on I-5 than with the No Build (Viaduct Closed Alternative) in central and south downtown. The same trend holds true near the ship canal, with the exception of the Elevated Structure Alternative, which would have 800 more vehicles daily at this location. Accordingly, each of the build alternatives would improve regional mobility in general terms compared to the No Build (Viaduct Closed Alternative).

C-017-021

5. Is the installation of sloping riprap being considered for other than just the S Washington Street to Madison Street section? The sloped riprap is desirable and adds a fish friendly habitat.

Utilities

C-017-022

1. There are two stormwater alternatives provided. The "BMP" alternative would require that the project meet current stormwater regulations, providing treatment and detention BMP's to achieve reduction in discharge of essential pollutants. The "Convey and Treat" alternative takes the stormwater and adds it to the combined sewer system for conveyance and treatment at West Point. This latter alternative goes against King County's policies.

2. The existing combined sewer facilities are already full during most storm events, so the stormwater will receive the minimal treatment (screening and disinfection) at the Denny Way facility, and be discharged to Elliott Bay. This solution would seem to add to an existing CSO problem within the City, when for minimal cost, the project could follow the current requirements and discharge treated stormwater to Elliott Bay.

We would like to reiterate that this project is vital to protect public safety, provide for the traffic demand in the corridor, and must be accomplished with minimum disruption to traffic flow and business activities. Funding must not be an excuse for delaying development. The effects of the viaduct collapsing are so profound that every effort must be made to prevent a catastrophic failure.

It is recognized the many of these comments may have been evaluated in your analysis. However, we feel that they should be fully addressed to satisfy the public record in your decision process in selecting a preferred alternative.

Our team appreciated the opportunity to provide our input into the project and hope that our work has been of assistance to the design team. Your assistance and courtesies were very helpful in our efforts.

Sincerely,



Theodore T. Bell, PE
Chair, Expert Team

C-017-010

The alternatives analyzed in the 2004 Draft EIS, 2006 Supplemental Draft EIS, 2010 Supplemental Draft EIS, and Final EIS include a range of viaduct repair and replacement designs, with some elements of earlier concepts combined with other design structures as the team looked at feasibility, cost and other criteria. The environmental and financial impacts and benefits were factors as the lead agencies selected the preferred alternative.

C-017-011

Please note that the Bypass Tunnel is no longer an option for this project. With respect to the Cut-and-Cover Tunnel, the wall alone would have to be stiffer and stronger when the tunnel is not there. Also, the economy of putting in both east and west walls at the same time is lost. Therefore, it is not cost effective to construct the seawall in such a way that a cut-and-cover tunnel could be built in the future.

C-017-012

When the project is built, the capacity at the north and south ends of the project is expected to match what currently exists today. The additional lanes proposed along SR 99 as part of the build alternatives are provided as auxiliary lanes to help facilitate efficient traffic flow near entrance and exit ramps, alleviating congestion and queuing issues that currently exist.

C-017-013

Several different travel routes were selected for analysis in the Draft EIS and are included in the Final EIS. The routes selected are intended to represent primary travel movements served by the SR 99 corridor. Routes analyzed represent travel times for through-trips and for trips into and out of downtown Seattle. The intent of presenting travel information in this form was to present readers with data that could be easily

comprehended and related to their everyday experiences. System-wide delay estimates are also included in the Final EIS.

C-017-014

The function of the downtown ramps at Columbia and Seneca Streets will be replaced by new ramps to Alaskan Way at King Street. Traffic analysis indicates that this arrangement will result in comparable or better overall traffic distribution and flow than is experienced with the current Columbia and Seneca Street ramps. This is because the current ramps concentrate traffic to a single, congested location in central downtown. The relocated ramps would instead allow drivers to diffuse through the street grid using many different paths.

C-017-015

The Surface Alternative has been dropped from further consideration. As explained in the 2010 Supplemental Draft EIS and the Final EIS, the Surface Alternative does not meet the project's purpose and need to provide capacity to and through downtown Seattle.

C-017-016

Considering that the Port of Seattle (POS) has facilities located between Interbay and points south of S. Spokane Street, calculating travel times from all the POS facilities and I-5 or I-90 was not feasible for this EIS. In addition, given that truck traffic can typically use all of the facilities designed for general traffic, travel times for trucks and general traffic will be very similar. Travel times for representative travel time routes have been calculated and can be found in the updated Transportation Discipline Report, Appendix C of the Final EIS.

C-017-017

Additional geotechnical investigations and engineering analyses have been conducted since the Draft EIS, as described in the Final EIS

Appendix P, Earth Discipline Report. Construction of any of the three build alternatives would include structures such as retaining walls, tunnels, foundations, excavations, and fills that would require ground improvements. All of the alternatives are designed to meet the current federal and state highway safety standards.

During the final design process, site-specific mitigation measures will be identified to address potential effects of settlement and ground improvements. Mitigation measures will be implemented in accordance with the plans and best management practices (BMPs) as described in Chapter 8 of the Final EIS.

C-017-018

The project's design team has evaluating the impact of tunnel construction on adjacent buildings and infrastructure along the corridor. Impacts include settlement that could occur adjacent to the tunnel excavation. Settlement can occur due to dewatering and excavation wall movement. For dewatering-induced settlement, design considerations—including a series of recharge wells—are being evaluated to mitigate potential lowering of the water table. For excavation-induced settlement, the wall system will be designed to be stiffer so that movements are minimized. In addition, instrumentation is proposed to monitor structures that are close to the tunnel walls. In some areas, underpinning or other structural strengthening may be required for existing structures to maintain their stability. These issues are all being reviewed during the design process.

The current alignment of the Bored Tunnel Alternative has the bored tunnel following the existing viaduct alignment until approximately the midpoint between Yesler Way and Columbia Street, avoiding sensitive structures at S Washington Street.

C-017-019

The improved ground will be a partial barrier to groundwater flow, resulting in a small amount of groundwater mounding. Groundwater buildup may be greater than 0.5 foot along the waterfront between about Pike Street and S. Washington Street, extending inland to about Fourth Avenue. Based on subsurface conditions and surface topography, a maximum groundwater buildup of approximately 3 to 4 feet could occur along the waterfront in the vicinity of Madison and Marion Streets. Within the vicinity of the seawall, potential groundwater buildup of this magnitude would be within the existing groundwater fluctuations resulting from tides in Elliott Bay that have been observed in shallow monitoring wells along the waterfront and therefore would not be a significant impact to the existing environment. It should be noted that most of the groundwater flow along the waterfront is coming from depth, not from upland. Because most of Seattle is paved, there is limited infiltration and flow of groundwater toward the waterfront in the near-surface soils. There is, however, an upward gradient of flow that flows from deeper soil layers to the ground surface.

Contamination has been detected in shallow groundwater along Alaskan Way. The contaminants typically consist of petroleum hydrocarbons and metals, and are typically at low concentrations relative to Washington State groundwater quality criteria. There is no provision to remediate shallow groundwater along Alaskan Way as part of this project. Contaminated groundwater encountered during construction would be pumped, treated, and disposed of in accordance with project permits.

C-017-020

The Final EIS describes the current project information and construction methods for the alternatives. The preferred Bored Tunnel Alternative would not replace the seawall. The Elliott Bay Seawall Replacement Project would be a separate project led by the City of Seattle.

C-017-021

If the Cut-and-Cover Tunnel Alternative or Elevated Structure Alternative is constructed, riprap would likely be replaced where the depths and location of the new seawall make it appropriate, although the project would minimize the disturbance of existing riprap. Riprap is not considered by many resource agency representatives to be “fish friendly,” although it appears to provide better habitat conditions than a flat concrete wall. Flatter slopes and finer grain substrate than riprap are desirable habitat characteristics in shoreline areas, and riprap is used primarily to protect the seawall. In addition, the replacement seawall with either alternative is expected to occur entirely landward of the existing seawall, thereby minimizing the need to alter the outside face of the existing seawall or any riprap areas.

The Final EIS describes the current project information and construction methods for the build alternatives. The preferred Bored Tunnel Alternative would not replace the seawall. The Elliott Bay Seawall Replacement Project would be a separate project led by the City of Seattle.

C-017-022

The Convey and Treat Approach has not been carried into the Final EIS. Based on detailed modeling, continued design, and coordination efforts a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This approach is described in Appendix O, Surface Water Discipline Report, and is most similar to the BMP Approach presented in the 2004 Draft EIS. To the extent possible, this stormwater management approach does not change sub-basin boundaries or receiving waters.



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AWV Project Office
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May 31, 2004

Dear Ms Ray:

Allied Arts commends WSDOT, the City of Seattle and the Federal Highway Administration for their initial work to analyze the environmental impacts regarding changes to the downtown Seattle waterfront, as well as to guide the process our region is taking toward redevelopment of this neighborhood. We also consider the Draft EIS and associated comments to be just one step in a series of necessary input opportunities and collective decisions.

C-018-001

Our position regarding the Alaskan Way corridor is that all through-Seattle traffic should travel underground from Atlantic Street into the Battery Street Tunnel and that Alaskan Way should receive no net gain in roadway. (Though technically Alaskan Way includes the area below

C-018-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Tunnel Alternative with no net roadway gain on Alaskan Way.

C-018-001

the viaduct, our definition refers to the three to four lane arterial.)

Since none of the five alternatives accomplish these goals, it is with some reluctance that we support the cut and cover tunnel alternative. Only this "tunnel option" comes close to creating a waterfront as a destination and not just a transportation corridor.

C-018-002

Having monitored the public discussion regarding the future of the waterfront for close to three years, we find that the DEIS would be significantly more meaningful if it approached its relevant issues using different questions, specifically:

- Instead of asking what "What type of transportation infrastructure should replace the viaduct?" the DEIS should answer, "What uses should we have for the land on the waterfront?"
- Instead of "How many cars and trucks need to move through the Alaskan Way corridor?" the DEIS should answer, "How many people and how much freight do we need to move through the full downtown corridor?"
- In addition to asking, "How can we reconstruct the seawall to make the land safe?" the DEIS should answer, "How can the seawall improve marine habitat?"

We ask that as you further study the opportunities for the waterfront that you also analyze and address the following considerations:

C-018-003

Pike Place Market to Waterfront Lid

The tunnel option includes a new viaduct from Pine to Battery. Extensive analysis should be made to develop a pedestrian descent over SR 99 from Virginia, south, to Alaskan Way.

C-018-002

Thank you for providing some suggested questions. The first suggested question related to land use extends beyond the purpose and need of this project, which is "to provide a transportation facility and seawall with improved earthquake resistance that maintains or improves mobility and accessibility for people and goods along the existing Alaskan Way Viaduct Corridor." Potential effects to land from the Alaskan Way Viaduct Replacement Project are discussed in the 2004 Draft EIS, 2006 Supplemental Draft EIS, 2010 Supplemental Draft EIS, and the Final EIS. The question "What uses should we have for land on the waterfront?" is being considered as part of the City's Waterfront Planning Project, which is a broader land use and planning effort.

The 2004 Draft EIS, 2006 Supplemental Draft EIS, 2010 Supplemental Draft EIS, and the Final EIS do discuss the volume of vehicles currently using the corridor and the projected volume of vehicles expected in 2030. Additional details are provided in the Transportation Discipline Report, which is Appendix C to each of these documents. These documents discuss how freight, transit, typical drivers, and pedestrians use the SR 99 corridor and describe how each alternative would change for these drivers and different users.

Your third suggestion relates to habitat. The lead agencies are committed to avoiding and minimizing adverse effects to habitat within the project area, and they are interested in enhancing or improving existing habitat, where it is feasible. The Bored Tunnel Alternative does not include replacing the seawall, improving the Alaskan Way surface street, or building a streetcar. However, improvements to these facilities would be individual projects led by the City of Seattle that are part of the Alaskan Way Viaduct and Seawall Replacement Program.

C-018-003

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel

C-018-003

Belltown to Waterfront Connection

A new viaduct from Virginia to Battery (as in the tunnel option) poses a significant barrier between the well-populated Belltown neighborhood and the waterfront. In addition to other clever solutions, lidding and under-viaduct structures should be considered as means to develop pedestrian comfort and wayfinding.

C-018-004

Pioneer Square Land Bridge

The tunnel portal near Pioneer Square would also be a significant barrier to healthy neighborhood connections. A land bridge arching over the portal that diminishes the horizontal gap should be considered.

Center City Land Bridge

Consideration should be given to a one- to three-block long land bridge over Alaskan Way somewhere between Yesler and Pike that would enable pedestrians to get to the water's edge from Western Avenue without crossing traffic. The space along Alaskan Way between Spring and Pike streets is a prime opportunity.

C-018-005

Southern Tunnel Portal

Analysis should be given toward moving the southern portal to the tunnel to a point south of Atlantic Street.

C-018-006

Tunnel Capacity

Based on a re-knitted downtown street grid, analysis should be given to diminishing the number of lanes in the cut and cover tunnel option from six down to four.

C-018-007

Access Road

We challenge the need for the access road as presented in the cross-section diagram for the tunnel option. Analysis should be given to providing delivery access from the curb of Alaskan Way, in keeping with the style along the other downtown avenues.

Alternative and evaluated in the 2006 Supplemental Draft EIS. It was included in the project, due in part to numerous 2004 Draft EIS public comments requesting the lead agencies to consider a lid in the Pike Place/Belltown area. The proposed lid would extend north from where SR 99 emerges from the tunnel's north portal near Pine Street to Victor Steinbrueck Park near Virginia Street. The design for this lid structure with the current Cut-and-Cover Alternative is described in the Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.

C-018-004

In the preferred Bored Tunnel Alternative evaluated in the Final EIS, the portal was moved south of S. King Street.

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel Alternative and evaluated in the 2006 Supplemental Draft EIS. It was included in the project, due in part to numerous 2004 Draft EIS public comments requesting the lead agencies to consider a lid in the Pike Place/Belltown area. The proposed lid would extend north from where SR 99 emerges from the tunnel's north portal near Pine Street to Victor Steinbrueck Park near Virginia Street. The design for this lid structure with the current Cut-and-Cover Alternative is described in this Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.

C-018-005

Your comment is appreciated and has been discussed by the design team. The configuration of the tunnel requires that on- and off-ramps access the tunnel from the tunnel portals. Moving the tunnel portal south would force the on- and off-ramps into the existing BNSF SIG and Whatcom railyards. This is not feasible given the current rail operations and traffic constraints.

C-018-008

Tourist and School Bus Holding Area

A parking station for busses away from the waterfront should be considered, such that they need only load and unload and not park on Alaskan Way.

C-018-009

No net Increase in Speed on Alaskan Way

The speed limit on Alaskan Way should be no more than 30 mph. Traffic lights should be set to move traffic between 22 and 28 mph—again, in accordance with other downtown avenues.

C-018-010

Distribute Additional Traffic Among All Downtown Avenues

As changes are made to SR 99, any additional traffic directed to the surface should be spread equally among all of the downtown avenues. I-5 should also be considered as an alternative for increased capacity, especially if it is reconfigured.

C-018-011

Pier Acquisition

The center city piers (48 – 70) are in dire need of repair or removal and the businesses located on the piers are more than likely to suffer from the deconstruction and construction process. Economic, environmental and cultural considerations should be analyzed regarding acquiring the piers and mitigating re-location of the businesses located on them. Plans for the new seawall and traffic infrastructure should fully consider the possibilities of a reconfiguration of the piers and businesses located on the waterfront.

C-018-012

Economic Analysis

The DEIS lacks an analysis of the economic ramifications to the waterfront neighborhood that compares the five DEIS alternatives. A full study should be made using both an analysis of the Seattle waterfront, current and future, as well as a review of other cities' waterfronts, post highway removal.

C-018-006

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

C-018-007

The layouts for the Alaskan Way surface street have been updated for the Final EIS and no longer include a service lane/access road. Please refer to the Final EIS for updated information. The ultimate design of Alaskan Way will be determined as part of the City of Seattle's Central Waterfront Project.

C-018-008

The need for tour and school bus waiting areas has been identified. This need would be greatest with the Cut-and-Cover Tunnel Alternative and Elevated Structure Alternative. The preferred Bored Tunnel Alternative is not likely to affect bus holding areas along the waterfront except during viaduct demolition. Alternate locations will be identified as construction plans are refined. These locations may be influenced by the Central Waterfront Project led by the City of Seattle.

C-018-009

The speed limit along the Alaskan Way surface street is currently 30 mph, the standard speed limit for arterial streets in the City of Seattle. The Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure Alternatives, the three build alternatives carried forward to the Final EIS, do not propose to change the speed limit along the Alaskan Way surface street. Traffic signals on Alaskan Way for the Cut-and-Cover Tunnel and Elevated Structure Alternatives would be designed to help facilitate safe

C-018-013	<p>Housing Analysis Analysis should be made of future opportunities for housing in adjacent neighborhoods and along the waterfront regarding the impact of traffic infrastructure.</p>
C-018-014	<p>Pedestrian Analysis Analysis should be made of the ease of pedestrian mobility on the street-level, both east-west and north-south. Location of pedestrian promenade should be analyzed.</p> <p>Skybridges Skybridges are the equivalent of pedestrian viaducts and should be avoided entirely.</p>
C-018-015	<p>Marine Habitat Analysis Analysis should be made of increasing salmon and marine-life habitat by at least 30% along construction areas.</p>
C-018-016	<p>Relocate Trolley Analysis should be made of moving Streetcar 99 to Western from Alaskan Way. A Western Avenue streetcar would better link neighborhoods to the waterfront and provide more space for destinations on the waterfront.</p>
C-018-017	<p>One Great Downtown Park Analysis should be made of identifying a space for a large, center city park, located south of Pike.</p>
C-018-018	<p>Construction Timeline and Costs Consideration and analysis should be made of the option of closing SR 99 for the duration of construction and absorbing traffic flow through a re-knitted downtown street grid.</p>
C-018-019	<p>Access to the Olympic Sculpture Park Pedestrian access to the new Olympic Sculpture Park should be prioritized over vehicular detours and flyovers. The Broad Street underpass beneath the railroad tracks should be excluded from the FEIS.</p>

and efficient traffic flow along the corridor. The Bored Tunnel Alternative does not include the Alaskan Way surface street as part of the project.

C-018-010

It is expected that, overall, traffic that diverts to use surface streets and I-5 will distribute based on available capacity and driver consideration of travel time of these various roadways. At this time, there are no plans to substantially increase capacity along I-5 through the downtown core. More information about these and other traffic management strategies can be found in Appendix C, Transportation Discipline Report, of the Final EIS.

With the preferred Bored Tunnel Alternative, the southbound on-ramp at Columbia Street and the northbound off-ramp at Seneca Street will be removed. Traffic patterns are expected to alter slightly with removal of these ramps, and the Alaskan Way surface street is expected to carry additional traffic to and from the central business district. Therefore, to provide similar capacity levels as currently exists today, six lanes of traffic on the Alaskan Way surface street are necessary south of Yesler Way.

C-018-011

Reconstruction of the pier structures is beyond the scope (and Purpose and Need) of the Alaskan Way Viaduct Replacement Project. Additionally, the lead agencies do not own many of the piers. The economic impacts and mitigation strategies for waterfront businesses are described in the Final EIS and Appendix L, Economics Discipline Report.

C-018-012

A detailed Economic Technical Memorandum was prepared for this project (Appendix P of the Draft and 2006 Supplemental Draft EISs) and provided important information to the public and decision-makers. This

Conclusion

In conclusion, we recognize that the major landowners along the waterfront are each public entities, holding the land in the public trust. We call upon WSDOT, the City of Seattle, the Port of Seattle and the Department of Natural Resources to work cooperatively, as well as to value and consider the quality of life aspects of our new waterfront that are otherwise out of their stated missions.

The Seattle waterfront has a long tradition of making bold changes to meet the needs of Washingtonians. Just as we poured Denny Hill onto our shoreline and constructed a viaduct along the waterfront last century, we should not miss this once in a century opportunity to make the waterfront a legacy that will bring pride to Seattleites and Washingtonians of the future.

Sincerely,

David Yeaworth
President
Allied Arts of Seattle

document was updated as Appendix L, Economics Discipline Report, of the 2010 Supplemental Draft and Final EISs. The analysis addressed the reasonably foreseeable economic impacts and benefits of the alternatives. While this project is unique, the experience of other cities that have built similar projects has been considered by the lead agencies.

C-018-013

Future housing opportunities in adjacent neighborhoods and along the waterfront would be determined primarily by market conditions. If the demand for housing in these areas remains high, new development may include residential uses where zoning allows. The proposed project may influence this demand in two ways. First, during the initial phases of construction, demand for housing in the immediate project area may be low because of construction traffic and activities. Second, toward the end of construction and immediately thereafter, demand for residential uses in these areas may increase once new infrastructure has been provided.

It is not possible to determine if these influences would be certain because they are strongly dependent upon other factors, the most significant of which would be economic conditions. To some extent, the demand for downtown and/or waterfront property for all uses is expected to remain strong, because the amenity values associated with these areas tend to be highly valued. If the Seattle-area economy is strong, future demand may remain high, even during construction activities, particularly among longer-term investors. On the other hand, if local economic conditions decline, interest in high-cost properties such as those along the waterfront, may also subside. While new infrastructure may provide some attraction to the area, economic factors such as pricing, inflation, interest rates, and wages would be expected to strongly determine the supply and demand of housing in the downtown and waterfront areas. The Final EIS Appendix L, Economics Discipline

Report, and Appendix G, Land Use Discipline Report, discuss economic conditions and zoning in the project area.

C-018-014

The mobility and access of pedestrian activities and their interaction with motorized vehicles has been studied, and the results are reported in the Final EIS Appendix C, Transportation Discipline Report. The pedestrian promenade is also discussed in this document. Both east-west and north-south pedestrian movements would be maintained for the duration of construction activities. The design of the central waterfront pedestrian facilities will ultimately be developed as part of the Central Waterfront Project being led by the City of Seattle.

C-018-015

Direct impacts to fish and wildlife are avoided through the selection of the Bored Tunnel Alternative. With the Bored Tunnel Alternative, there is no in-water work for the Project. Because direct impacts are avoided, compensatory mitigation is not required.

C-018-016

Construction of the Olympic Sculpture Park and the resulting displacement of the vehicle storage and maintenance facility led to the indefinite suspension of the George Benson Line Waterfront Streetcar service in 2008. King County Metro currently provides replacement service with fare-free bus service on the Route 99 Waterfront Streetcar Line. The routing and stop locations for this line do not exactly duplicate those of the waterfront streetcar; however, Route 99 serves the same neighborhoods—the waterfront, Pioneer Square, and Chinatown/International District. The final location of the streetcar will be determined by the Central Waterfront Project being led by the City of Seattle.

The City of Seattle has evaluated the option of moving the Waterfront Streetcar from the Alaskan Way surface street to Western Avenue and found that businesses along the waterfront would be better served by maintaining operations in the Alaskan Way corridor.

C-018-017

The design of the Alaskan Way surface street is being carefully considered and coordinated with the City of Seattle. It is anticipated that the waterfront can become a prime public amenity for Seattle's downtown and the Puget Sound region. The specific configuration and types of activities featured on the waterfront will be decided over the next several years as the City continues its central waterfront planning efforts. There will continue to be many opportunities for the public to participate in that planning effort to help determine the future of their waterfront.

C-018-018

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each

alternative and its construction plan, and Chapter 6 describes construction effects.

C-018-019

The preferred Bored Tunnel Alternative is not expected to affect access to the Olympic Sculpture Park.

With the Cut-and-Cover Tunnel or Elevated Structure Alternatives, pedestrian access to the Olympic Sculpture Park will be provided throughout project construction, although some detours may be required. During construction, vehicle detours for these two alternatives will be required near the park. The lead agencies will coordinate with the Seattle Art Museum if either of these alternatives is selected. The Broad Street underpass analyzed in the Draft EIS is no longer part of the project. Instead, the Cut-and-Cover Tunnel and Elevated Structure Alternatives propose to replace the ramps to Elliott and Western Avenues.

Response to DEIS from:

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General Comments:

- C-019-001 | 1. When a "preferred option" is selected, does it include a "preferred option" for the surface?
- C-019-002 | 2. If the answer to #1 is yes, how do we maintain flexibility for the urban designer? One way would be if a "preferred operation" were selected for the surface. It wouldn't dictate where the roads were vs. where open space was, only provide a criteria for the operations of the surface. This could illustrate how many lanes are needed, what the delivery criteria are for the piers, ferry loading criteria, etc., but let the urban designer help craft the surface to accommodate traffic and humans together. Thus the "Preferred Operation" becomes part of the program that the urban designer must respond to.
- C-019-003 | 3. The urban designer shouldn't be hampered by decisions for "frontage roads, or even where the ferry traffic goes until they can assess the waterfront as a whole. Don't handcuff the urban design by dictating what happens on the surface.
- C-019-003 | 4. Can the tunnel be positioned closer to the surface to minimize cost?

No Net Increase of Road Width:

Issues to Study:

- C-019-004 | 1. Can the outside lanes become parking lanes during certain hours of the day to minimize road width?
- C-019-005 | 2. Can dedicated turn lanes be eliminated?
- C-019-006 | 3. Can bicycle lanes / frontage road be combined? I.e. there is no additional width for bicycle lanes.
- C-019-007 | 4. Can there be a grand central boulevard wide enough to accommodate pedestrian uses (at least 75', 100' preferable), lawns, plazas, etc? Use Portland's Park Blocks as a model. This might mean minimizing the Promenade to 20-25'.
- C-019-006 | 5. Can off-site Ferry Parking be eliminated with a multi-storied holding facility on the ferry terminal site?
- C-019-007 | 6. Can off-site Ferry Parking be integrated with Private development?
- C-019-007 | 7. Look into alternative "trolley" technologies as described below. I.E. rubber-tired trams that can climb greater slopes. This will allow more access to Belltown.

C-019-001

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. The preferred Bored Tunnel Alternative would not redesign the Alaskan Way surface street. The final design of Alaskan Way is being led by the City of Seattle's Central Waterfront Project.

C-019-002

The preferred alternative (Bored Tunnel Alternative) does not include improving the Alaskan Way surface street. Improvements to the Alaskan Way surface street would be led by the City of Seattle as one of several projects included in the Alaskan Way Viaduct and Seawall Replacement Program.

The City is developing a Central Waterfront Project that will guide redevelopment of the central waterfront after the viaduct and seawall are replaced. A concept plan was published in July 2006, and the City will begin the detailed master plan in 2011. The plan may include new public spaces, public art, and a waterfront promenade. Both the Tunnel and Elevated Structure Alternatives include expanded opportunities for pedestrians and bicyclists along the waterfront, and these new or enhanced facilities will connect with existing ones to both the north and south of the project corridor.

Washington State Ferries is also evaluating improvements to the Seattle Ferry Terminal and is coordinating with the project regarding access for that facility.

C-019-003

The tunnel could not be raised closer to the surface to minimize cost. A primary reason for the proposed depth of the tunnel is to accommodate the utilities that are required to transverse the tunnel sections. Many of

C-019-008

8. Develop other alternatives to the “frontage lanes” for delivery access.
- Implement restricted hours for deliveries. For example, from 10:00 p.m. to 6:00 a.m.
 - Can the “Promenade” be used in restricted hours as a delivery lane, this would mean access to the sidewalk level via curb cuts, no dedicated lane.
 - Can the frontage road be limited to every other or every third street, instead of along the entire waterfront?
 - Why can’t curb cuts allow trucks to back in for deliveries during restricted hours?
 - Is there a maximum distance for deliveries / drop off points dictated by city or state code? If not, why are we providing special access for these businesses when it will be severely detrimental to the waterfront, and takes up so much land.
 - In some schemes a frontage road is shown adjacent to a proposed green space by Pioneer Sq., is this necessary when there is no need for deliveries. Can we return this land to open space?

C-019-009

9. General Comment. Please provide cross-sectional representations for the north, middle and south waterfront in the downtown area for each option and variant. The generic sections do not help one to see the various options.

C-019-010

10. Does a viaduct structure need to be replaced, or can capacity be delivered at the same price by improving other routes and modes of travel? For example, can improved, direct connections be made to 1st, 4th, Airport Way and I-5 from the West Seattle Bridge? Can access from the north be made through improved, direct connections to 6th and 7th avenues, and perhaps through the tunnel to Belltown? Can new water, and rail based modes of transit decrease the need for the viaduct structure?

Comments:

C-019-011

The width, and number of lanes on the Alaskan Way surface street should not increase over what is there presently today. Four Lanes plus a shared turn lane is more than adequate for the majority of the waterfront.

Alaskan Way Street Alignment:

Three options for the cross section of the waterfront should be studied or accommodated. These may come in combinations of 2 or all 3 if the final urban design calls for it. All assume the trolley is on Western Avenue, which would be preferable, although none are precluded with the trolley on Alaskan Way. If the trolley is on Alaskan Way it should run in traffic to preserve land for other uses.

1. **Western street alignment:** Move Alaskan Way tight against the western edge of the waterfront promenade. Allow for approx. 30’ of promenade. Provide 2 lanes of traffic in each direction, the outer lane for parking in off-peak hours, a center turn lane only where

these utilities require a certain depth of cover and cannot be raised. Please see the Final EIS for current information about the proposed depth for the Bored Tunnel Alternative, which is the preferred alternative for this project.

C-019-004

Refer to Chapter 3, Alternatives Description, of the Final EIS for updated descriptions of the alternatives. The ultimate design of Alaskan Way will be determined as part of the City of Seattle’s Central Waterfront Project.

C-019-005

A wide waterfront promenade is planned along the water side of the Alaskan Way surface street as described in Chapter 5 of the Final EIS for the Cut-and-Cover Tunnel, and a smaller promenade would be developed for the Elevated Structure. For the preferred Bored Tunnel Alternative the City of Seattle will design and develop the area through its Central Waterfront Project.

C-019-006

Redesign of the ferry terminal at Colman Dock or related ferry queuing facilities would be led by Washington State Ferries and would not be a part of this project.

C-019-007

Evaluation of the types of trolley technologies for applicability on city streets is not related to the purpose of this project and therefore not evaluated in the EIS.

C-019-008

The design for the Alaskan Way surface street has continued to evolve as the project moves forward. The final configuration of Alaskan Way S.

C-019-011

applicable (not a boulevard median). This will allow 30-90' along the eastern edge of the waterfront for a prominent sidewalk, open space plazas, or limited development.

2. **Eastern Street Alignment:** Move Alaskan Way tight against the eastern edge of the urban fabric. Allow for approx. 20' of promenade. Provide 2 lanes of traffic in each direction, the outer lane for parking in off-peak hours, a center turn lane only where applicable (not a boulevard median). This will allow 40-100' along the waterfront for a prominent sidewalk, open space plazas, or limited development.
3. **Split Alignment (Grand Boulevard):** Provide at least 75' for a center boulevard of open space plazas, lawns and limited development. Split the roadway of 2 lanes in each direction with the outer lane dedicated to parking in non-peak hours. This will allow for a prominent sidewalk on either side of Alaskan Way.

C-019-012

Ferry Loading:

It is important that the ferry terminal fit in with the character of the waterfront, and that the loading / unloading / queuing mechanisms have minimal impact on the pedestrian. These factors will greatly impact the pedestrian friendliness of the waterfront

1. Location of parking queue:

- The Surface (and surface variant 1), Rebuild, Bypass, and Tunnel Alternatives show a parking queue that is placed partially on terminal 46 (west of Alaskan way). Also provided is a dedicated roadway for ferry traffic. This creates an extra layer of travel lanes between the water and Pioneer Sq., making the limited amount of open space left undesirable. Ferry traffic should use the lanes provided on Alaskan Way, maximizing open space for other uses or development.
- The Aerial Alternative, Bypass (Variant 1, 2, 3), Tunnel (Variant 1, 2, 3, 4) shows queuing to the east of Alaskan Way. Queues will then travel north on Alaskan Way to the terminal. This frees the land near the water for park space or pedestrian oriented development. This option should be encouraged.

2. Alternatives to reduce footprint/ Impact: Alternatives should be explored to reduce the impact of the ferry traffic and terminal on the waterfront. The structure should be integrated in a pedestrian friendly way.

C-019-013

Eliminate Dedicated Taxi / Bus "Frontage Road":

Why do Taxis, Buses and Delivery trucks need their own lane? There seems to be a need by WSDOT to fill up all the space on the surface with traffic instead of people oriented activities. Taxis and Buses can use GP lanes with special marked load/unload areas like those downtown and at local hotels, and delivery trucks can deliver at certain times of day. Return this land to pedestrian use.

1. Wasted Space: This lane is wasteful of the limited space we have to create pedestrian activities along the waterfront. The limited use nature of this lane does not warrant its existence.

will now be determined by the Central Waterfront Project being led by the City of Seattle. For more information, please see the Final EIS.

C-019-009

Please see the updated alternatives descriptions and graphics in the Final EIS.

C-019-010

Many people asked the lead agencies to consider an alternative that would remove the viaduct and replace it with a four-lane surface roadway along Alaskan Way and include transit improvements. Without a host of improvements and modifications, a four-lane Alaskan Way would create even more congestion on I-5 and downtown streets than the alternatives evaluated in the Draft and Supplemental Draft EISs. Transportation studies performed for this project indicate that replacing the viaduct with a four-lane surface street would substantially increase congestion for most of the day and part of the evening on I-5 through downtown Seattle, downtown streets, and Alaskan Way. On downtown streets, traffic would increase by 30 percent; though traffic increases to specific areas like Pioneer Square and the waterfront could exceed 30 percent. With a four-lane roadway, traffic on Alaskan Way would quadruple to 35,000 to 56,000 vehicles per day compared to about 10,000 vehicles today. This traffic increase would make Alaskan Way the busiest street downtown, carrying more traffic than Mercer Street does today. The increased traffic congestion would also make travel times worse for buses, making transit improvements along these streets largely ineffective. Finally, neighborhoods west of I-5 (Ballard, Queen Anne, Magnolia, and West Seattle) would be less accessible and would face longer commute times.

C-019-011

With the Cut-and-Cover Tunnel and Bored Tunnel Alternatives, the

C-019-013

2. **Creative Solutions:** The sidewalk at the piers should be structured to take delivery trucks, who can use it at limited hours of the day. Other cities dictate special delivery times, so can we.

C-019-014

Parking:

While parking is an issue, it should not overwhelm the waterfront. Structured parking should not be placed at the edge of the urban fabric next to the waterfront, but held 1 block off. All structured parking should be placed within multiple use buildings, including retail, commercial and/or housing. Parking should be placed in underground facilities if possible. A revised trolley line along Western will allow people to park in Belltown and take the trolley to the waterfront.

C-019-015

The Seattle Waterfront Trolley:

The DEIS refers to a “historic character” that the trolley contributes to on the waterfront, which is more nostalgic rhetoric than reality. The Seattle Waterfront Trolley should become a part of the greater Seattle Transportation system, more than just a tourist ride as it is primarily today. In order to do this, the trolley must be integrated with the urban fabric of the city, engaged with the citizens of Seattle and serving their needs. Thus the Western Avenue route is the best choice.

The Western Ave. alignment allows the trolley to easily access...

- The heart of Pioneer Square
- The emerging shopping and office corridor between Pioneer Sq. and the Market.
- Harbor Steps and the Cultural Corridor along University St.
- The Pike Place Market (the #1 tourist attraction in the state of Washington)
- Victor Steinbruck Park
- The emerging residential corridor from the Market to the Olympic Sculpture Park
- The Olympic Sculpture Park
- Via Broad to the Seattle Center

Unfortunately, the Western Avenue alignment shows the trolley turning east on Blanchard, I'm assuming to meet up with the proposed S. Lake Union streetcar at Westlake. This connection makes sense, however it would make more sense if the trolley were planned to run along Western to the Olympic Sculpture Park. This would allow the trolley to serve the thousands of units of housing surrounding this future tourist destination. Continuing through Belltown to Broad, turning east to the Seattle Center the trolley could then serve S. Lake Union via a re-connected Thomas St. If Broad is too steep, the trolley should cross Denny to Lower Queen Anne and use Mercer to connect with South Lake Union.

The major impediment to E-W trolleys in Seattle is the grade of the streets. Light Rail trolleys generally run at 5% or less. This is why new technologies might be appropriate. The GRT tram

southbound on-ramp at Columbia Street and the northbound off-ramp at Seneca Street will be removed. Traffic patterns are expected to alter slightly with removal of these ramps, and the Alaskan Way surface street is expected to carry additional traffic to and from the central business district. Therefore, to provide similar capacity levels as currently exist today, six lanes of traffic on the Alaskan Way surface street are necessary south of Yesler Way. With the Elevated Structure Alternative, additional lanes proposed on portions of Alaskan Way are for the purpose of improving traffic circulation and flow, especially in the vicinity of Colman Dock. The ultimate design of Alaskan Way will be determined as part of the City of Seattle's Central Waterfront Project.

The alignment of the Waterfront Streetcar has been updated for the build alternatives evaluated in the Final EIS. Please see the Final EIS for more information. The City of Seattle has evaluated the option of moving the Waterfront Streetcar from the Alaskan Way surface street to Western Avenue and found that businesses along the waterfront would be better served by maintaining operations in the Alaskan Way corridor.

C-019-012

The project has evolved since comments were submitted in 2004; the Final EIS discusses ferry queuing on Alaskan Way. Neither the Cut-and-Cover Tunnel Alternative nor the Elevated Structure Alternative include ferry queuing on Alaskan Way. The preferred Bored Tunnel Alternative does not include the Alaskan Way surface street as part of the project. If this alternative is selected, the final design of the waterfront will be determined by the Central Waterfront Project being led by the City of Seattle and will be coordinated with Washington State Ferries. Colman Dock modifications and/or improvements are not part of the Alaskan Way Viaduct Replacement Project and are to be determined by Washington State Ferries.

C-019-015

produced by Bombardier looks like light rail, and provides low-floor boarding, but is more flexible. The following is text from the Bombardier website (<http://www.bombardier.com>).

Operating on an exclusive right of way, as well as in mixed traffic, the GLT offers a cost-efficient solution that can help shape cities while stimulating ridership, new investment, and commercial development.

The rubber-tired GLT, featuring automatic guidance via a single rail imbedded in the roadway, requires less infrastructure than traditional trams, and can be easily maintained at bus maintenance depots.

Capable of operating on street gradients up to 13%, and negotiating 39-foot (12-m) radius curves during normal operation, GLT trams offer exceptional urban maneuverability, while respecting environmental and community noise standards.

The stylish, double-articulated vehicles meet high comfort standards for passengers with 100 per cent low-floors and air-conditioned interiors. Wide panoramic windows allow unobstructed views of the city landscape.

Tram-on-Tires – Nancy, France

In 1998, the Greater Nancy Urban Community (CUGN) of France ordered 25 Tram-on-Tires units from Bombardier Transportation, with the objective of equipping its segregated-lane transit system. The Tram-on-Tires' main benefit is its rail and road bi-modality: it can be operated on a segregated electrified lane with a single central guiding rail, or operated as a road vehicle on tires, driven independently and powered by a diesel-electric system. The Greater Nancy urban area will accommodate the new Tram-on-Tires units on its existing trolleybus network. High comfort standards for passengers are met with 100% low-floor and air-conditioned accommodations, along with wide panoramic windows that allow unobstructed viewing of the city landscape. These units offer exceptional urban maneuverability, with the capacity for 12-metre radius curves and 13% gradients during normal operation. Tram-on-Tires is brightening the City of Nancy with its innovative, modern and environmentally-friendly features.

I have personally ridden this same system in Caen, France and can attest to its comfort and compatibility in the urban environment.

A Place for Parks:

Issues to Study:

C-019-016

1. What are the options for the location / size of the emergency ventilations systems / egress structures? How can they be better integrated into park space or development? Can they be located in the unused medians to preserve space, and flexibility for open space and development?

C-019-013

The frontage lane has been removed from the Alaskan Way surface street plans for the Cut-and-Cover Tunnel and Elevated Structure Alternatives. Please refer to the Final EIS for updated information. With the preferred Bored Tunnel Alternative, the final design of the Alaskan Way surface street will be determined as part of the City of Seattle's Central Waterfront Project.

C-019-014

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide

C-019-017

2. Can park edges, or bio-swale medians also provide an ecological way to treat street runoff?

C-019-018

3. Can we maximize space for parks (i.e. minimize road width) along the central waterfront by routing traffic to 1st and 4th avenues south of the Stadiums?

Comments:

C-019-019

The surface and aerial options offer little to no possibility for new open space on the waterfront, and the higher noise levels created by these alternatives will decrease the enjoyment of the waterfront for our citizens. The increased footprint of the new aerial alternative will actually decrease the amount of open space along the waterfront, and encroach further upon the remaining open space with shadow and noise. Both tunnel alternatives provide ample opportunities for new open space, however the ramps for the Bypass option along Alaskan Way and under the Olympic sculpture park will harm the experiential qualities of these places.

1. **Open Space priority:** Every lane, median, and limited access road eliminates more open space for the public, reducing the attractiveness of the public's investment and should be minimized along the waterfront.
 - Prioritize usable open space vs. non-usable open space. For example a 10' median is unusable, but if you provide 10' more open space here and 10' more there, you can provide enough to make plazas, or greens.
2. **Open Space vs. Transportation:** Currently most options show approximately 70-80% of the total width along the waterfront as transportation oriented. This is unacceptable. Creative alternatives need to be found for freight / taxis who have a dedicated lane, parking, road capacity, location of the trolley, width of medians, etc. Maximization for open space footprint should be the most important goal of the surface treatment.

Pioneer Sq. :

Tunnel Variant #1 is preferable for providing opportunity for significant waterfront open space.

Central Waterfront:

Bypass Tunnel Option #2 is preferable (but with the Tunnel) because it allows open space along the waterfront, and preserves open space by putting the trolley in traffic (this makes good use of the median as well). Tunnel Option #4 is also a good option, allowing open space at the city edge, and moving the trolley to western preserving open space.

North Waterfront:

Alternatives that minimize lanes, move the trolley to western, have no tunnel entrances, and do not disturb the Olympic sculpture park are preferred.

A 24/7 Waterfront:

frequent parking updates

- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

C-019-015

Construction of the Olympic Sculpture Park in 2008 led to the indefinite suspension of the George Benson Line Waterfront Streetcar service because it displaced the vehicle storage and maintenance facility. King County Metro currently provides replacement service with fare-free bus service on the Route 99 Waterfront Streetcar Line. The routing and stop locations for this line do not exactly duplicate those of the waterfront streetcar; however, Route 99 serves the same neighborhoods—the waterfront, Pioneer Square, and Chinatown/International District. With the Bored Tunnel Alternative the final location of the streetcar will be determined by the Central Waterfront Project being led by the City of Seattle. Both the Cut-and-Cover Tunnel and the Elevated Structure Alternatives include the streetcar along Alaskan Way.

C-019-016

Please see the Final EIS for the current proposed designs of the build alternatives. The Final EIS describes the current proposed locations for the tunnel operations buildings (which include the ventilation structures) and the locations of emergency egress locations.

C-019-017

Stormwater will be managed in accordance with the applicable stormwater management regulations. The Final EIS discusses how current requirements will be met. Currently, bioswales are one of many

Issues to Study:

C-019-020

1. Can the tunnel be structured to allow small scale (2-3 story) development on top of it?

Comments:

Opportunities for Development:

The surface and aerial options offer little or no possibility for new development on the waterfront. These options also deter property owners from developing their properties adjacent to the viaduct. This lack of investment / reinvestment will continue to make the waterfront an undesirable place for Seattle and regional citizens.

The Tunnel options could allow for limited development, and will encourage adjacent property owners to redevelop buildings to "face" the waterfront. New pedestrian oriented businesses will be encouraged where none now exist.

Pioneer Sq.:

Tunnel Variant #1 is preferable for providing opportunity for limited development.

Central Waterfront:

Tunnel Option #4 is a good option, allowing limited development along the city edge. All tunnel options should provide a lid adjacent to Victor Steinbruck Park and be coordinated seamlessly with the Pike Place Market PDA's plans for the "Joe Desimone (PC-1 North) site directly south of the park.

Neighborhood Connections:

Issues to Study:

C-019-021

1. Can more E-W streets be reconnected in South Lake union across Aurora?

C-019-022

2. Some options show new stairs at Pine and Union, are these included in the cost?
These elements are nice but need to be designed by an urban designer / architect so they work well with the new urban design scheme (to be designed).

C-019-023

3. If the Bombardier tram system (see "No Net Increase in Road Width" above) is used, or another rail trolley / tram technology or system is used can the trolley be extended to South Lake Union via Lower Queen Anne, or Broad street rather than turning east on Blanchard as shown?

Comments:

C-019-024

The Aerial alternatives create a similar or larger visual and physical barrier to the waterfront from downtown, which is a lost opportunity to reconnect the city to the water. The surface

approved stormwater treatment methods that may be considered for the project.

C-019-018

Currently the majority of north-south traffic between Royal Brougham Way S. and S. Spokane Street use First Avenue S. and Fourth Avenue S. (classified as principal arterials by the City of Seattle) instead of East Marginal Way (classified as a minor arterial). Travel patterns are expected to remain similar for the year 2030 No Build, Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure Alternatives.

C-019-019

The Surface, Aerial, and Bypass Tunnel Alternatives mentioned in your comment are no longer being considered.

Both the Cut-and-Cover Tunnel and Elevated Structure Alternatives evaluated in the Final EIS would reconfigure the Alaskan Way surface street and provide more space along the west side of the street. The Elevated Structure Alternative would do this by placing the northbound Alaskan Way traffic underneath the new viaduct. With the Bored Tunnel Alternative, the configuration of Alaskan Way will be determined by the Central Waterfront Project being lead by the City of Seattle. Please refer to Chapter 3 of the Final EIS for a description of the alternatives.

C-019-020

If the preferred Bored Tunnel Alternative is selected, redevelopment of the waterfront would be considered under a separate project (the Central Waterfront Project) led by the City of Seattle. With the Cut-and-Cover Alternative, the Alaskan Way surface street would continue to be above the proposed tunnel through the central waterfront. The wider pedestrian promenade, the surface street, bike lane, and street car tracks do not leave space for new development on top of the tunnel along the central

C-019-024

alternative removes the visual barrier but increases the physical barrier to the waterfront due to increased traffic and roadway width.

The best options to reconnect the waterfront to the city are the tunnel options, and more specifically the Tunnel option over the Bypass option. The removal of the on / off ramps allow more streets to comfortably connect to the waterfront. The removal of the viaduct makes it possible for each adjacent neighborhood to make its presence felt along the waterfront, adding it's unique character.

A Grand Market Connection:

Issues to Study:

C-019-025

1. Study how a lid from Pike street to the north edge Victor Steinbrueck Park would need to be accommodated Structurally, Mechanically, with Fire / Life / Safety, and Plumbing / Sewer, Vents, etc. The lid should accommodate the ability to create stepped, heavily landscaped terraces from Victor Steinbrueck Park to the Central Waterfront. Could these terraces support 2-3 story structures? If not why not, and what would it take to do so? Engineering of this portion of the project **should not preclude** this lid in the future if it is not affordable today. Provide the infrastructure that would make a retrofit possible, and more affordable in the future if it is accommodated today.
2. Can Pine street offer a pedestrian connection to the waterfront like Harbor Steps?

Comments:

The one connection that needs to be accommodated is a direct connection between the waterfront and Victor Steinbrueck Park, at the Pike Place Market. The tunnel variants provide the best opportunity for this. Because of the noise of the viaduct a lid must be provided as mitigation from where the tunnel breaks the ground plane to the northern edge of Victor Steinbrueck Park. This lid must be coordinated with the final urban design consultant for the project and structured to accommodate significant landscaping, and small built structures (1-3 stories) that might be a part of the urban design of the waterfront. It must also be coordinated with the market's plans for the property south of Victor Steinbrueck Park. This proposal has strong community support (see the Allied Arts design collaborative and the City of Seattle's charette presentations) and needs to be studied for it's structural impacts to the project. At the very least, the roadway must be positioned to accommodate a future lid, and the basic structure must provide for a lid with landscape and buildings. Columns must be accommodated, and the lid must be engineered to verify clearances, spans, and beam depth. Mechanical and emergency systems should assume a lid is in place or will be in the future from the northern edge of Victor Steinbrueck Park to where the tunnel emerges along the waterfront.

waterfront. Under the current design, the Cut-and-Cover Tunnel Alternative would include a lid structure near Pine Street, which could provide some opportunities for new development. The proposed lid would extend over the existing BNSF railroad tracks and connect Steinbrueck Park with the waterfront.

C-019-021

Two choices for improvements north of the Battery Street Tunnel were evaluated in the 2006 Supplemental EIS, the Partially Lowered Aurora option and the Lowered Aurora option.

The build alternatives analyzed in the Final EIS all include a reconfigured roadway north of the Battery Street Tunnel that includes new east-west connections across Aurora Avenue. The preferred alternative, the Bored Tunnel Alternative, would connect John, Thomas, and Harrison Streets across Aurora Avenue with signalized intersections at Denny Way and John, Thomas, and Harrison Streets.

C-019-022

The locations of the pedestrian connections between the Pike Place Market area and the waterfront are being carefully considered as part of the urban design process for the surface streets in the Alaskan Way viaduct area. The final design of Alaskan Way will be determined as part of the City of Seattle's Central Waterfront Project.

C-019-023

The extension of the Waterfront Steetcar is not related to the purpose of this project. Therefore, it is not analyzed in the EIS.

C-019-024

Thank you for stating your preferences among the alternatives. The lead

C-019-025

The Bypass Tunnel options which show a new roadway from Western /Elliott to the waterfront does not allow for the best pedestrian connection possible and risks being an unsafe corridor because people have little reason to be there as this road is in an urban canyon between the backside of condos and a parking garage.

Touch the Water:

C-019-026

Issues to Study:

1. Investigate how the seawall can be structured to provide access to and from the water, and provide shelves that will encourage sealife to flourish on the waterfront.
2. Are there areas of the waterfront where the seawall can give way to more natural "beach-like" settings.

Comments:

The seawall should not be a barrier between people and the water, it should be designed in such a way that encourages access the water.

Respect for Neighborhoods:

Issues to Study:

C-019-027

1. Please review the following structures as possible models for the Belltown aerial structure. Some are true auto-bridges others are meant for architectural inspiration. The aerial structure slicing through Belltown needs to be more of a "feature" than merely infrastructure. The small distance it covers should minimize the cost of increasing the aesthetics.
 - Renzo Piano's Ushibuka Bridge- Prefab steel sections for a highway
<http://194.185.232.3/works/033/>,
<http://www.arup.com/bridges/project.cfm?pageid=2140>
 - Santiago Calatrava's use of artistic concrete (mostly cable stayed pedestrian bridges, but the artistry should be strived for).Under "Projects, Bridges"
<http://www.calatrava.com/dfsadf>
 - Other bridges:
 - a. <http://www.structurae.de/en/photos/index.cfm?JS=492>
 - b. <http://www.arup.com/bridges/project.cfm?pageid=2308>
 - c. <http://www.arup.com/bridges/project.cfm?pageid=2138>

agencies have identified the Bored Tunnel Alternative as the preferred alternative.

C-019-025

Subsequent to the issuance of the 2004 Draft EIS, project designers have examined the possibility of extending the tunnel lid to the Victor Steinbrueck Park. Two possible lid structures were evaluated in the 2006 Supplemental Draft EIS. One of these lid structures is evaluated with the Cut-and-Cover Tunnel Alternative in the Final EIS.

C-019-026

The lead agencies are committed to avoiding and minimizing adverse effects to habitat within the project area, and they are interested in enhancing or improving existing habitat, where it is feasible. The Bored Tunnel Alternative does not include replacing the seawall. However, improvements to the seawall would be individual projects led by the City of Seattle that are part of the Alaskan Way Viaduct and Seawall Replacement Program.

In general, the physical conditions in Elliott Bay, including the substantial depth and relatively steep slopes adjacent to the seawall, together with the navigational uses of the Seattle waterfront, make it impractical to gradually slope the seawall or construct it with shelves. The video survey along the shoreline demonstrates that sea life does flourish at many locations, although many species are different than would occur with a natural intertidal shoreline.

Habitat enhancement options are being considered as part of the ongoing design and environmental evaluation process to develop opportunities to improve habitat conditions for shoreline-oriented marine organisms. Where physical conditions and existing uses permit, the project may consider construction of "beach-like" settings. However, the purpose of such actions would likely be for mitigation for impacts to the

C-019-027

2. The Viaduct Project should be integrated into and shielded from neighborhoods with art.
 - http://www.dcm-group.com/PROJECTS/7-Mel/95708/95708_30_S.jpg
 - http://www.dcm-group.com/PROJECTS/7-Mel/95708/95708_16_S.jpg
 - http://www.dcm-group.com/PROJECTS/7-Mel/95708/95708_26_S.jpg
 - http://www.dcm-group.com/PROJECTS/7-Mel/95708/95708_14_S.jpg
 -
3. Lid the partial block over which the viaduct enters the Battery street tunnel. This lid can help encase the fan units and other mechanical equipment necessary for the tunnel upgrade. This could become a neighborhood park. Again, the final design should allow for this in the future if it is not included in the current project.
4. Historic Piers should be kept at all costs, demolition or damage should be avoided at all costs. The use of parking lots for construction staging is encouraged over demolition of existing buildings. These properties should then be used for open space or sold for development.
5. Tunnel portals should be treated artistically with light and structure, and possibly as a place for development. Public Private Partnerships should be sought for these important locations. The following is one example of an office building being built over a major tunnel in the Netherlands... <http://www.galinsky.com/buildings/nemo/>.
6. Ventilation systems should be well designed if they are stand-alone structures. See the following as an example... http://www.terryfarrell.co.uk/projects/moving/mov_kowloonVent.html. If the ventilation and egress systems are worked into existing or new development, it must be well designed and integrated well into the development.

Comments:

The Olympic Sculpture Park:

C-019-028

Olympic Sculpture Park will be a major tourist attraction and public amenity that should not be impacted, or compromised by this project. The Alaskan -Western tunnel at Broad will inject traffic noise and visual disruption into one of Seattle's best opportunities for respite.

The Tunnel and Bypass Alternatives showing this option should be amended to delete this negative impact.

Portals and Mitigation:

C-019-029

1. Number of Portals: The number of project portals should be minimized for the tunnel options. Two is ideal, one south of King, the other emerging from Denny. The public

aquatic environment from the construction or operation of the project, or for habitat enhancement rather than improving access to the water.

C-019-027

The examples you provided were reviewed by project engineers and planners. A variety of measures to mitigate for visual impacts are discussed in the Final EIS Appendix D, Visual Quality Discipline Report. The piers along the waterfront will remain, and access will be provided during construction. The design aesthetics and treatment of features will be considered by the lead agencies where they are compatible with the City's urban design goals.

C-019-028

The Olympic Sculpture Park is now an existing public park. The underpass at Broad Street that was analyzed in the Draft EIS is no longer being considered.

C-019-029

The preferred alternative proposes two portals, one south near S. Royal Brougham Way and one north near Harrison Street. The Bypass Tunnel Alternative has been dropped from further consideration. Please see the Final EIS for current information about the proposed build alternatives.

C-019-029

should be given a choice in one tunnel variant (Potential #5?) for this option, cost analysis should be kept separate as not to skew the tunnel options up.

For the tunnel options provided, the number of portals for the Bypass option (and Bypass Variant 4) is detrimental to the character of the northern waterfront, and destructive to the character of the Olympic Sculpture Park and are therefore unacceptable.

C-019-030

2. Impacts on Pike Place Market: All Tunnel and Bypass variants should mitigate the impacts to the market and Victor Steinbrueck park by providing a lid over the viaduct to at least the northernmost edge of the park.

C-019-031

3. Battery Street Lid: The Battery Street Tunnel should be extended with a lid over the partial block that the viaduct emerges from. This is a chance for the project to provide a sound buffer and public amenity in the heart of Belltown. If this is too expensive, the project should not preclude this option in the future by providing adequate foundation for such a lid.

C-019-032

4. Tunnel portals should be treated artistically with light and structure.

C-019-030

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel Alternative and evaluated in the 2006 Supplemental Draft EIS. It was included in the project, due in part to numerous 2004 Draft EIS public comments requesting the lead agencies to consider a lid in the Pike Place/Belltown area. The proposed lid would extend north from where SR 99 emerges from the tunnel's north portal near Pine Street to Victor Steinbrueck Park near Virginia Street. The design for this lid structure with the current Cut-and-Cover Alternative is described in this Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.

C-019-031

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel Alternative and evaluated in the 2006 Supplemental Draft EIS. It was included in the project, due in part to numerous 2004 Draft EIS public comments requesting the lead agencies to consider a lid in the Pike Place/Belltown area. The proposed lid would extend north from where SR 99 emerges from the tunnel's north portal near Pine Street to Victor Steinbrueck Park near Virginia Street. The design for this lid structure with the current Cut-and-Cover Alternative is described in this Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.

C-019-032

The aesthetic design of the tunnel portals has not been established. The availability of funding may influence the ability of the project to incorporate non-essential aesthetic components to the project design, though aesthetic designs at the tunnel portals may also be implemented as a mitigation measure. Incorporation of art or other design features will be addressed as the engineering and construction plans are finalized for the preferred alternative.

The I-90 tunnel portal at Mount Baker provides one example of incorporation of art in a tunnel portal by WSDOT.



June 1, 2004

Megan White, Director
Environmental Services Office
Washington State Dept of Transportation
AWV Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

RE: SR 99: Alaskan Way Viaduct & Seawall Replacement Project, Draft Environmental Impact Statement

To Ms. White:

We have reviewed the *SR 99: Alaskan Way Viaduct & Seawall Replacement Project, Draft Environmental Impact Statement (DEIS)*, dated March 2004. We applaud the tremendous amount of staff and contractor effort that has gone into producing the information and analysis, as well as the effort to make the DEIS a public-friendly document.

However, we believe that the DEIS is inadequate because the public and decision-makers are not able to evaluate a reasonable range of alternatives. The five alternatives in the main DEIS document are all variations of the same project and involve significant traffic and environmental and social impacts along Seattle's waterfront. The "no build" alternative was not presented in the main document but in an appendix – implying to the reader that this is not a real alternative. Beyond the concepts presented and the "no build" alternative, it is important that a reasonable range of alternatives be presented to the public for this project. In contrast to the alternatives presented, there are alternatives that will move people and goods through and to downtown, AND create a people and environment-friendly waterfront along the shoreline of Elliott Bay. Capacity improvements in underutilized areas of downtown, such as 1st and 4th streets could be further developed and included in a project that improves downtown, the waterfront and Elliott Bay in a creative and far-reaching way. Economic vitality, transportation solutions, environmental health, and a people-friendly waterfront must be placed on an equal tier.

Alternatives need to be developed that accommodate transportation AND create a great waterfront. We would like to see consideration of additional reasonable alternatives that achieve or approximate the purpose of the project at lower environmental costs. A "no build" alternative could involve removing the unsafe viaduct and developing a less expensive traffic access plan including the restriping of I-5, accommodation of traffic into the city on other arterials, such as reconfigured 1st, 4th and 6th and a major commitment to flexible transportation projects. A smaller tunnel could be accomplished

C-020-001

C-020-001

Thank you for your detailed review of the Draft EIS. We have responded to each of your detailed comments in the responses that follow with your attachment. Regarding the range of alternatives considered, the Viaduct Closed (No Build Alternative) is described in Chapter 3, Alternatives Description, of the Final EIS and is part of the analysis presented in Chapter 5, Permanent Effects. Because the project has evolved since this letter was written in 2004, please refer to the Final EIS for current information.

Mitigation measures have continued to be developed and discussed in Chapter 8 of the Final EIS. The lead agencies have provided numerous opportunities and venues for public and agency review and discussion of the project.

The Final EIS, Appendix O (Surface Water Discipline Report), and Appendix N (Wildlife, Fish, and Vegetation Discipline Report) provide updated information on how the alternatives affect Elliott Bay. The project includes several features that will help improve the health of Elliott Bay, including capturing and treating surface runoff that currently flows into the Bay without any treatment.

Although costs are an important part of project planning and decision-making, they are purposely not a major part of the environmental review process. As provided in CFR 1502.23, for purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations. Overall project costs are included with the project description and are used for the analysis of economic impacts. Cost estimates for the alternatives evaluated in the Final EIS are:

- Bored Tunnel – \$1.96 billion

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C-020-001

on the waterfront (4 lanes total) with a lesser amount of concrete on the surface – no more than 4 total lanes and minimal pavement. Another option would be to create two bore tunnels that could avoid impacting the waterfront directly. Through traffic could go into the tunnels at the stadiums and emerge north of Mercer. Two bore tunnels would be significantly less expensive than one – which had been examined by the Viaduct Team earlier in the process but not presented to the public. These concepts should be incorporated into a range of alternatives that would have fewer adverse impacts to be avoided and mitigated, and would meet the transportation needs of the state and city in a win-win project.

In addition to our main objection to the lack of a full range of alternatives for the project, we have serious concerns about the following issues. These comments and other comments are further detailed in the attachment.

- Mitigation measures are not developed for most aspects of the project. We suspect this is because of the tight time frame of the planning process – requiring the DEIS to be published in the first quarter of 2004, for example. The public, therefore, is not given the opportunity to fully evaluate the merits of the alternatives and mitigation measures. Furthermore, additional public process will be needed for any proposed mitigation actions that are developed at a later date.
- No serious effort is presented in the DEIS to improve the health of Elliott Bay. In fact, the nearshore is discounted as being unimportant. It is not acceptable to state that because an area is already degraded then there is no need to restore the habitat and water quality. The nearshore, of which the waterfront is part, is vital, for example, to help bring back the health of juvenile salmon in Puget Sound. Further, the failure to recognize potential for habitat restoration is itself an adverse impact, as building the project without restoration could permanently preclude it.
- Long-term costs of the project, including environmental impacts, and non-direct construction costs – such as impacts to businesses in the waterfront are not included.

In conclusion, we do not believe that the project fulfills the purposes of the SEPA chapter which are: “(1) To declare a state policy which will encourage productive and enjoyable harmony between man and his environment; (2) to promote efforts which will prevent or eliminate damage to the environment and biosphere; (3) and stimulate the health and welfare of man; and (4) to enrich the understanding of the ecological systems and natural resources important to the state and nation.”

If you have any questions, please feel free to call me or Heather Trim of my staff at (206) 382-7007.

Sincerely,


Kathy Fletcher
Executive Director

Attachment

- Cut-and-Cover – \$3.0 to \$3.6 billion
- Elevated Structure – \$1.9 to \$2.4 billion

These cost estimates do include different elements. The Bored Tunnel Alternative cost does not include replacing the seawall, improving the Alaskan Way surface street, or building a streetcar. Costs for the Cut-and-Cover Tunnel and Elevated Structure Alternatives do not include replacing the seawall between Union and Broad Streets.

**Specific Viaduct/Seawall DEIS Comments
People For Puget Sound**

C-020-002

PEOPLE FOR PUGET SOUND'S VISION FOR THE WATERFRONT

People for Puget Sound is a citizens' organization whose mission is to protect and restore Puget Sound and the Northwest Straits. We focus on water quality and shoreline habitat, advocating that the State of Washington devote more resources to the prevention of further degradation of the Sound and to its recovery as a healthy ecosystem. The SR:99 Viaduct and Seawall Project has the potential to be a win-win undertaking that can help us further improve the condition of Elliott Bay and Puget Sound while creating solutions for transportation, the economy and a human-oriented waterfront.

Features of this win-win vision, that is good for the people and good for the Sound, include:

- Nearshore habitat, both constructed and natural, that allows for fish migration along the waterfront
- Quality nearshore habitat for non-migrating species, including birds
- Clean water entering Elliott Bay from Seattle
- Retention of access and capacity through, to and from downtown.
- Transportation solutions that promote less single occupancy driving at the waterfront
- Elimination of the safety risk of the viaduct and seawall
- Good access from the water for all sizes of boats, including kayaks and canoes
- Opportunities for humans to touch the water, such as beaches and low walkways
- Significant green and open space; continuous and interconnected greenway
- Excellent tourist and destination features
- Connections to the neighborhoods
- Reduction of acreage devoted to parking of vehicles, particularly overwater
- A knitting of the water with the land and the land with the water
- Pedestrian Precinct in Downtown, human health prioritized
- Bicycle paths
- Easy transit options and well interconnected transit hubs
- Spiritual places
- Places that honor the area's history
- Quality access for disabled persons
- Vibrant retail areas, cafes
- Facilities for families and residents
- Maritime and other well paid jobs; a thriving Port of Seattle
- Significant reduction of concrete on the waterfront and
- A waterfront that will improve our quality of life, make Seattle proud and attract economic investment in our state.

We can't solve tomorrow's problems with the transportation solutions of yesterday. If we are going to spend \$3 to \$4 billion, then we want a waterfront that is better than we have now.

C-020-002

Thank you for sharing People for Puget Sound's vision for the waterfront. Since the Draft EIS was published in 2004, the lead agencies have been working through an extensive public process to develop and refine alternatives as part of a public dialogue that has continued since the project began. The most current information describing the project's purpose and need, proposed alternatives, permanent and construction effects, and proposed mitigation is provided in the Final EIS.

C-020-003

DEIS DOES NOT INCLUDE A REASONABLE RANGE OF ALTERNATIVES

The DEIS does not present a reasonable range of alternatives. Some additional reasonable alternatives that achieve or approximate the purpose of the project at lower environmental cost might include:

A double bore tunnel. We understand (Bob Chandler, personal communication) that a single, large bore tunnel was initially considered for the project. We propose consideration of two smaller bore tunnels from the area of the stadiums to north of Mercer. Two bore tunnels would be significantly less expensive than one massive bore tunnel. Bore tunnels, although costly, would eliminate major costs associated with years of construction impacts, as well as negative environmental impacts, along the waterfront. The duration of construction, 7.5 to 11 years, as stated in the DEIS, does not include 18 months of utility relocation and site preparation, which would involve construction of access roads and staging areas, relocation of the #5 Fire Station, and relocation of utility and rail lines.

Reasons to avoid impacting the waterfront with 7.5-11 years (plus an additional 18 months) of disruption:

- The proposed alternatives require the purchase or displacement of 14-33 parcels for needed rights-of-way, including 8-20 structures, displacing 273-581 jobs.
- Noise, dirt, light and glare during construction which would impact 6,183 dwelling units (9,759 persons), including 1,336 that are low income, special needs or emergency, that are located within one to two blocks of the construction area (Appendix I, Social Resources Technical Memorandum, page 9).
- Arrival and departure of construction trucks, lack of parking, difficult access, and utility disruptions for 1,098 businesses within one block of site – 78.5% of which are small with less than 20 % employees (Appendix P, Economics Technical Memorandum).
- Disruption of rail and freight traffic
- Significant potential water and sediment quality problems during construction. Potential water quality problems outlined for the various alternatives in Appendix U (Hazardous Materials Discipline Report) include a) remobilization of existing soil and groundwater contamination by construction activities or by drawdown of groundwater, b) contamination issues related to dewatering activities, and c) direct impacts to Elliott Bay.

Smaller Tunnel, Moved to the East: Creating bore tunnels or moving the cut and cover tunnel to the east, in order to provide more room for habitat restoration, would eliminate the need for filling in Elliott Bay and allow for a more flexible seawall plan. Pocket beaches, cutouts of the seawall, creation of coves and bird islands, and more, could be created if the tunnel is moved east and separated from the seawall. A smaller tunnel could be accomplished on the waterfront (4 lanes total) with a lesser amount of concrete on the surface – no more than 4 total lanes and minimal pavement.

A Different approach to a "No Build" alternative: A "no build" alternative could involve removing the unsafe viaduct and developing a less expensive traffic access plan including the restriping of I-5, accommodation of traffic into the city on other arterials, such as 1st, 4th and 6th – which would involve some reconfigurations – and a major commitment to flexible

C-020-003

Since this Draft EIS was published in 2004, the lead agencies have been engaged in a very public process to develop, evaluate, and refine concepts and alternatives evaluated in the Supplemental Draft EISs published in 2006 and 2010 and the Final EIS.

The preferred alternative is a Bored Tunnel Alternative, which is a variation of the ideas you suggest below. An I-5, surface, and transit concept was considered and was dropped for reasons discussed in the Final EIS.

C-020-003 transportation projects. Capacity arguments in the DEIS support using the street grid and making improvements on I-5 and increasing transit. If the City can handle reduced capacity during construction phase, why can't it be handled permanently? Further, the system is constrained by capacity limits to the north and south (Appendix C), which supports the argument for a more encompassing traffic plan that involves multiple entry points into downtown. This "No Build" alternative would also avoid the costs and impacts listed above under *bore tunnels*.

SCOPE OF PROJECT NARROWED

C-020-004 The initial project, as described in 2001 Federal Notice, included a wider range of alternatives. This range was narrowed but the reasons were not fully explained in the DEIS. Some options were, as noted in the DEIS, considered too expensive but no details were provided. It is not clear that adding transit capacity or reconfiguration of the surface street system would not be cost-effective in the long-term.

Scope of project from 2001 Federal Notice of Intent: "The proposed action would provide a facility with improved earthquake resistance that maintains or improves mobility for people and goods along the existing SR 99 Corridor. The proposed action would involve improvements to the existing 2-mile viaduct structure or construction of a new facility. The southern terminus of the project would be the First Avenue South Bridge. The north terminus would be north of the existing Battery Street Tunnel and will be determined after project scoping to (1) not preclude a possible connection to the south Lake Union vicinity (the Mercer Street Corridor connection to Interstate 5), (2) not preclude a possible realignment of the SR 99 corridor, and (3) not preclude using the existing Battery Street Tunnel and existing Alaskan Way Viaduct facilities."

"Although alternatives have not yet been identified, preliminary alternatives under early consideration include: taking no action, seismic retrofit of the existing structure, in-kind replacement of the current structure, replacement with a new elevated structure of a different configuration, replacement with a tunnel, removal of the viaduct and reconfiguration of the surface street system, adding transit capacity, or combinations of these solutions."

Nickel-Funding Restriction: Under the 2004 Supplemental Transportation Appropriations (ESHB 2474; Sec 302 (15)), a proviso was added that limited the state funding to options that replace capacity through the waterfront corridor. The project, however, has also been funded by other entities, including the Seattle (\$5 million), Puget Sound Regional Council (\$1.2 million), the Corps of Engineers (\$100,000), and the federal 2003 budget (\$2 million) according to the WADOT web page, and those funds could be used to look at alternatives that use the entire downtown area.

Ideas brought out by the Leadership Team: The Viaduct/Seawall Team created a leadership team to help guide the project. People For Puget Sound strongly supports many of the ideas that are listed on the WADOT web page from this group. Some key concepts include:

- Take advantage of opportunity to add capacity through, about, and around downtown.
- Create multi-modal solutions – transit, single occupant vehicles, freight, bicycle-pedestrian facilities, ferries, light rail, etc.

C-020-004

Since the project began in 2001, several Notices of Intent have been issued in response to various changes to the project's scope. These changes in scope, have often been in response to concerns and opportunities raised the public, agency personnel, and decision-makers, such as the Governor and Mayor of Seattle. As stated in your letter, the 2001 Notice of Intent had a broader scope than the Notice of Intent published in 2003. However, in 2008, Governor Gregoire, former Seattle Mayor Greg Nickels, and former King County Executive Ron Sims committed to a collaborative effort, called the Partnership Process. The Partnership Process looked at how improvements to the broader transportation system (including Seattle surface streets and I-5) could work with various ways to replacement the viaduct. The Partnership Process occurred as part of the NEPA process for the Alaskan Way Viaduct Replacement Project as documented in a Notice of Intent published in the Federal Register on July 16, 2008.

Many of the ideas brought out by the Leadership Team outlined in your comment letter have been incorporated into the project alternatives to the extent feasible. These include developing multi-modal solutions and improving open space, public space, the waterfront, and the relationship of the City to its waterfront.

C-020-004

- Create an open space along the waterfront, including public space, connections to downtown, and commerce.
- Create a beautiful waterfront and enhance the vitality of the area.
- Preserve relationships of the City with its waterfront.
- Bring the waterfront back into the City.

CONFLICT WITH CITY VISION FOR A GREAT WATERFRONT

C-020-005

The Mayor has publicly stated that he views the waterfront as the city's front porch and that he supports the city's waterfront planning process. The City Council has adopted visions/guidance statements conflict with the Viaduct/Seawall DEIS:

Seattle City Council Viaduct Resolution 30497 (July 15, 2002): City Council and the Mayor passed a joint resolution (#30497 *A Resolution relating to the Alaskan Way Viaduct and Seawall Project*, indicating the high priority of this Project and establishing initial guiding principles for the Project.) on July 15, 2002:

- High Priority Project. The Alaskan Way Viaduct and Seawall Project is one of the highest transportation priorities for the City of Seattle. The Project is necessary to address safety issues and maintain the corridor as a critical component of the local, state and regional transportation system.
- Section 2. Principles. The City intends to use the following principles to guide its actions on the Project, with the understanding that the Project will be further developed through review and analysis of options by the City and WSDOT:
 - a. Address Safety Risks. To protect public safety, urgent action must be taken because both the Viaduct and Seawall face a significant risk of failure. Significant damage to either one would very likely result in injury and loss of life, property damage, economic loss, and disruption of the regional transportation system, so any proposed solution must provide for significant improvement or the replacement of both structures.
 - b. Phasing. The City recognizes that the magnitude of the overall project will likely necessitate a phased approach for construction. If phased, each phase should have functional utility and should allow the corridor to be used during construction. The initial phase should focus on the areas that pose the greatest safety risk, primarily the central waterfront. But the initial phase must also produce a functional roadway that, to the extent possible, is integrated with the existing street network and begins to address long-term transportation solutions for the South Lake Union area. The City and WSDOT will coordinate construction phasing with other major construction and redevelopment projects.
 - c. Funding. Funding for a project of this magnitude, which is a critical component in the City's transportation infrastructure, a key link in the region's freight mobility network and an essential element of the State's highway system, will require a broad partnership between the City, the Port of Seattle, the State, and

C-020-005

The City of Seattle, as one of the three lead agencies, has been working with the project team to comply with all of the applicable plans and policies of the City. The City's Department of Planning and Development has been working concurrently on a new Waterfront Plan that meets the various neighborhood and habitat goals. The project has focused on minimizing Puget Sound habitat impact and on protecting this valuable resource. Design modifications have been made and will continue to be made to minimize or eliminate encroachment into Puget Sound and to minimize impacts of seawall reconstruction (a project necessity) on habitat. Waterfront access has been and continues to be a major City and project team priority, both during and after construction. The project alternatives reflect the importance of the waterfront and have been designed to either remove most functional and aesthetic disruptions (tunnel alternatives), or to minimize those while still meeting current highway design standards (Elevated Structure Alternative).

C-020-005

other regional representatives, as well as direct Federal support. The City is committed to working cooperatively to establish such partnerships and to support approaches that can jointly address the funding requirements of the project and other regional and state transportation needs.

- d. Design. Overall design should address urban design issues unique to each neighborhood, minimize adverse impacts to neighborhoods and local businesses from construction activities, and minimize environmental impacts. Priorities for the three components of the Project are as follows (these are based on current information about the components and options being analyzed, and will be further developed based on ongoing analysis):

1. South. Design should provide improved connections to SR 519, the Spokane Street Viaduct and the stadium area, as well as allowing flexibility for future redevelopment along the waterfront adjacent to Pioneer Square and the stadium area.

2. Central. To the maximum extent practicable and feasible, design should include an underground tunnel and integrated seawall replacement along the central waterfront in order to reconnect downtown neighborhoods with the waterfront and to provide opportunities for open space amenities and an improved pedestrian environment.

3. North. To the maximum extent practicable and feasible, design should include an underground tunnel with a portal north of Roy Street, allowing the surface streets in the South Lake Union/Seattle Center area to be reconnected in order to improve access and mobility, and improved connections between SR 99 and I-5.

Seattle City Council Waterfront Resolution 30664 (April 26, 2004): The City Council adopted A Resolution adopting Principles for Development of a Central Waterfront Plan which included the following Framework Principles for Development of a Central Waterfront Plan:

- Balance and Integration.
- Access and Connection.
- Authenticity and Identity.
- Destination and Movement.
- Diversity and Flexibility.
- Economic Development
- Environmental Sustainability. *Develop the waterfront as a model of environmental sustainability through redevelopment and public improvements that enhance marine habitat and migration, improve water and air quality, and reduce noise. Pursue "salmon-friendly" practices and improvements to enhance migratory fish routes and feeding areas.*

We included the text for the Environmental Sustainability bullet to demonstrate the commitment of the City to habitat and water and air quality along the waterfront.

C-020-005 *City/State Plans:* The Viaduct/Seawall proposed alternatives are not consistent with most of the stated goals of city and state plans and policies which are listed in Appendix G (Land Use and Shorelines Technical Memorandum), such as the Shoreline Master Program, Belltown Neighborhood Plan, and the Commercial Core Neighborhood Plan. *Specifically, People For Puget Sound disagrees with the DEIS conclusions that the project, as proposed, is in line with the Shoreline Master Program (Appendix G, pages 43-49). The project does not protect areas of the shoreline that are biologically fragile, provide for the optimum amount of public access, relocate transportation facilities that are functionally or aesthetically disruptive to the shoreline, or ensure that all future uses will preserve and protect environmental systems, including wild and aquatic life.*

MITIGATION

C-020-006 The DEIS generally addresses the topic of mitigation by providing "potential mitigation" measures or by stating that mitigation actions will be developed at a later date. There are few specific mitigation measures outlined in the DEIS and appendices. The description of mitigation as "potential" measures leaves no assurance that any mitigation is actually proposed or guaranteed. We understand that a tight deadline was imposed – that the DEIS was required to be published in the first quarter of 2004 - but there is no assured public process to review proposed mitigation measures before the project is finalized. Further, it is difficult to evaluate the proposal when mitigation is not included or is proposed in minimal terms.

As an example, in Appendix T (Geology and Soils Technical Memorandum, Chapters 8 and 9) minimal mitigation measures are described for some aspects of the project, but in other cases mitigation is described as requiring the use of proper design techniques ("Drainage features...should be properly designed..."), as actions that "should" be done ("The stockpiles should be covered with plastic to mitigate erosion due to surface water and rain.") or actions that "could" be done ("Geotextiles could be used to reinforce potential failure zones within the fill."). In sum, there is no clear comprehensive mitigation plan for each alternative that can be evaluated in a systematic fashion.

Further, no mitigation is proposed for mounding of groundwater in the Central Waterfront where groundwater is only 8-12 feet below ground surface: "Potential groundwater buildup of this magnitude would be within the existing groundwater fluctuations resulting from tides in Elliott Bay. Therefore, mitigation measures will not be necessary." (Appendix T, page 102). People For Puget Sound requests that this issue studied further. If groundwater will be re-routed, or mounded up, in the project area due to soil grouting, then will there be areas of preferential flow that will cause undermining of the surface in other areas?

COMPLETE LISTING OF COSTS

C-020-007 It is not clear that all costs have been included, especially long-term environmental costs. Specific concerns are:

- Did project costs include construction-related costs such as relocating businesses during construction, and operating employee shuttles?

C-020-006

The Final EIS outlines the proposed mitigation measures to address project effects. Please see Chapter 8 for the mitigation discussion. Each of the Final EIS appendices contains a section that addresses mitigation for that discipline. The project's Record of Decision also will outline the project's mitigation measures. In some cases, specific mitigation measures will not be identified until final design of the project occurs, when the contractor knows exactly how the project will proceed. The lead agencies will mitigate for project effects as required by environmental regulations.

C-020-007

These construction-related costs (which are neither long-term nor environmental) were included in the project cost estimates.

- C-020-008**
- *How much funding is included for mitigation?:* The mitigation proposals are sketchy for most aspects of the proposal. Have these costs been included in the overall projected costs for the alternatives? For example, in Appendix B (Alternatives Description and Construction Methods Technical Memorandum, page 71) direct transit enhancements are described. The final sentence, however, states: "Specific options on how the funding would be used are not known at this time and could be identified during the development of the preferred alternative."
- C-020-009**
- If quality habitat is not provided with this project for the waterfront, will we have to rip it all out and start over again in 20 years? The City is committed to the restoration of salmon and this project should provide progress towards that goal.

REMOVAL OF PROJECTS TO REDUCE COST OF VIADUCT PROJECT

- C-020-010**
- It appears that a number of aspects of the proposal were included in the earlier \$11 billion price tag have now been separated out and are not included in the DEIS:
- *Elliott to Alaskan Way Underpass:* A huge issue for future congestion in the waterfront is the increasing number of trains traveling north at Broad Street. Initially, the Viaduct/Seawall Team addressed this problem by creating an underpass as part of the viaduct project. In the DEIS, however, this project is now described in Appendix B (Alternatives Description and Construction Methods Technical Memorandum, page 129) as a City of Seattle project and further, it is unclear if it will be built. Trains are expected to increase from the current 10 per day to 39 per day within the decade (Bruce Agnew, personal communication).
 - *Mercer Mess:* Does this project include funds for all of the fixes proposed for the Mercer Mess and other problems north of downtown?
 - *Transit Opportunities:* How much funding does this project dedicate towards alternative transportation and transit? The WADOT web page states: "project does not expand capacity for future growth so that growth will need to be accommodated in modes other than single occupant cars. All of the alternatives include a range of flexible transportation programs that will ensure that people and freight continue to move through the corridor far into the future...Currently, 45% of commute trips to downtown Seattle are transit trips. Provisions to ensure that transit can continue to access downtown Seattle from the SR 99 corridor are being considered in each alternative. Measures such as transit priority treatments at traffic signals and provision of temporary transit lanes may be implemented during construction. Some of these measures may be continued permanently, if necessary, to maintain transit mobility. The lead agencies will continue to work closely with local transit agencies to identify the best mix of strategies to give transit vehicles priority on congested roadways where they are most effective." Will funding for these measures be included in the Viaduct/Seawall project?

TRANSPORTATION ASSESSMENT INCOMPLETE

- C-020-011**
- Transportation information is vital to the evaluation of this proposed project. Additional information would assist the public to better review the alternatives.

C-020-008

Specific funding for environmental mitigation has not been developed. For a project of this size, funding will most likely come from a variety of sources. Cost estimates (which should not be confused with funding) for the mitigation measures described with the preferred alternative are included in the overall project cost estimate.

C-020-009

The habitat mitigation and enhancement measures provided by this project make a long-term contribution toward improvement of the marine environment for salmon and other species by improving water quality. Also, careful attention has been paid to avoid precluding habitat improvements by other projects or agencies. For example, the City of Seattle is now studying a variety of surface treatments for the seawall to see what types of features best support marine organisms. The seawall created by this project has been designed to support whatever treatments are developed by the City.

C-020-010

The comment is correct that several aspects of earlier proposals are not included in the Final EIS. The underpass near Broad Street was included in all 2004 Draft EIS alternatives; but upon further study, it was eliminated and replaced with connections to Elliott and Western Avenues. These ramps provide efficient connections to the Ballard-Interbay area without increasing traffic along the northern section of the central waterfront. This also avoids conflicts with train traffic.

Improvements to the West Mercer Corridor are currently under study by the City of Seattle. This is a separate project addressing different needs and is independent of the Alaskan Way Viaduct Replacement project. Both studies are being closely coordinated by the City of Seattle to ensure that proposed actions are consistent with each other. The projects are funded separately.

C-020-011 In Appendix C (Transportation Discipline Report), reference is made to *Task 1 Report* (December 1996) but it is not clear that “insights on travel characteristics of trips made on the Alaskan Way Viaduct” are provided in the DEIS or Appendix C. Specific evidence is lacking for the statement on page 53 of the Appendix that 38% of vehicles that use Viaduct on a daily basis have one trip-end in downtown Seattle. Additional questions that remain unanswered in the DEIS include:

- Where are the commuters coming from and going to within downtown?
- What trucks use the viaduct, where do they come from, where do they go, and what time of day do they travel?
- What trucks use Alaskan Way, where do they come from, where do they go, and what time of day do they travel?
- How many trips on the Viaduct are to and from the airport?
- How many trips on the Viaduct are optional (i.e., if the viaduct was closed, the trips would not occur)?
- Where are ferry autos (in-vehicle boarding) headed once they exit Colman Dock?
- What is projected rail traffic at Broad Street?
- What evidence is there that the entire 110,000 vehicle load would transfer to I-5 as stated on page 38 of the DEIS?

C-020-012 *Ferry location and traffic:* The congestion caused in downtown during ferry off-loading periods will become much worse if the Colman expands from 650 to 1100 vehicle capacity. An old Washington State Ferry traffic report (1999 WSF Travel Survey Analysis and Results Report) shows that 51% of the walk-on traffic (weekday pm peak period) from the Bainbridge Ferry goes to the Seattle Central Business District but the destinations for the auto traffic is much more diffuse:

<u>Destination</u>	
Seattle Central Business District	12.7%
Seattle Industrial Area	2.8
South Seattle/West Seattle	7.8
Sea Tac	8.9
Capitol Hill/University District	16.8
Queen Anne/Lake Union/Magnolia	10.0
Ballard/Green Lake/North Seattle, etc	7.6
Bothell/Redmond/ N Bellevue and CBD	5.8
Other Bellevue/Mercer Island	13.3
SW and West King Co/ Renton/Kent	6.7
All other places	7.9

Unfortunately, peak AM data was not included in the study. People For Puget Sound advocates relocating the auto ferry to the south for better connections to I-90, I-5 and SeaTac and retaining and increasing passenger-only ferries into downtown. New technologies and the use of private carriers may be warranted.

C-020-013 *Traffic will move onto arterials or will shift to transit in the future:* As described in Appendix C, traffic demand models forecast that transit mode will shift from 23 to 45% by 2030. If this shift

Regarding funding for transit improvements, the project costs do include funding for the measure cited in the comment. These types of transit improvements are a critical part of maintaining mobility while the project is under construction.

C-020-011

Traffic analyses have been updated in the 2006 and 2010 Supplemental Draft EIS and in the Final EIS. Appendix C, Transportation Discipline Report, of the Final EIS contains detailed information regarding traffic volumes and characteristic travel patterns in the corridor.

C-020-012

AM peak period traffic data has been included in the Final EIS. This provides a better understanding of what traffic conditions can be expected in the vicinity of Colman Dock. Please see Appendix C, Transportation Discipline Report, of the Final EIS for more information. Redesign of the ferry terminal at Colman Dock or related ferry queuing facilities would be led by Washington State Ferries and would not be a part of this project.

C-020-013

Thank you for your comment. The text in the Draft EIS explains possible high and low ranges for traffic volume forecasts on the viaduct and arterial streets. The high end of the range represents the maximum traffic volume that would be expected to travel along the viaduct. Additional increases in traffic along the viaduct would not be possible without first addressing capacity on facilities that connect to the corridor. In essence, upstream and downstream capacity constraints limit the amount of traffic that will be able to travel along the viaduct. The Draft EIS is not attempting to support an argument for directing capacity to side arterials but does suggest that there are upper limits to the amount

C-020-013 does not occur, then the Viaduct Team's model shows that vehicle traffic on arterials in downtown will increase 27-29% and on the viaduct only by 6-7% (Appendix C, page 14). The capacity constraints on the viaduct are due to capacity constraints outside of the corridor and constraints on roadways that feed traffic to SR 99. This appears to support an argument for directing capacity to the side arterials.

C-020-014 *How many commuters are there in the proposed rebuild segment?* Looking at the DEIS and Appendix C, it appears that the total number of commuters to downtown is relatively limited, in part due to constraints on the current system. For example, southbound commuters using the Interbay area may not go onto the viaduct to downtown because of the lack of easy downtown exits. Other potential commuters may use alternative routes due to the large number of stoplights and significant congestion on SR99 north and south of downtown.

In an attempt to get a picture of the daily commuters to downtown on the Viaduct, one can use the pm peak hour vehicle numbers provided on Appendix C Exhibit 4-9:

2600 Commuters/Travelers come into the Viaduct southbound through Battery Street Tunnel:
300 exit at Western, 700 exit at 1st Street
1250 enter at Elliott, 1300 enter at Columbia
4100 continue on towards West Seattle Bridge where 1750 exit and 2450 continue south
This appears to represent approximately 1000 commuters from the north to downtown, 2550 commuters from downtown to the south and approximately 1600 travelers from north of downtown traveling through to the south.

Northbound, using peak pm hours:
3300 travelers come from the south (Spokane entrance and points south)
1200 enter at 1st Ave, 500 enter at Western
650 exit at Seneca, 1250 exit at Western
3050 continue through Battery Street tunnel
This appears to represent approximately 1900 commuters from south of downtown to downtown or Interbay, 1700 drivers from downtown commuting to the north and approximately 1400 travelers from south of downtown traveling through to the north

Even if you multiply this by 3 (to represent 3 rush hours), these are not huge numbers of drivers. AM peak traffic numbers were not provided but likely a reverse pattern is observed. This contrasts with the daily travel patterns reported in Appendix C (page 59) in which higher percentages overall are through-trips: 45% entering to and from the south are through-trips and 60% of vehicles entering to and from the south are through-trips. Overall, a clearer picture is needed of who uses the viaduct and where they are going.

C-020-015 *Trucks:* Appendix C notes that truck traffic (page 91-95) is as high as 5200 trips per day, mostly during non-commute times, and consists of more than 50% medium trucks, primarily concrete and delivery trucks. Tankers make up about 2% of the truck traffic. The Port of Seattle, in a letter dated August 27, 2001, (Appendix A, Agency and Public Coordination) clearly states that their freight transportation needs are well served by connections to the south and that it is

of traffic that can be expected along the viaduct in the future.

Note also that parallel arterials do not have much available capacity. Percentage increases are relative to the current amount of traffic carried by these roadways and reflects that they do not have the capacity to carry the same magnitude of traffic as does SR 99 or I-5.

An updated travel demand model has been prepared and was used for the Final EIS analysis and evaluation. The updated model results forecast lower projections of future transit ridership relative to the Draft EIS analysis. See the Transportation Discipline Report of the Final EIS (Appendix C) for more details.

C-020-014

The Alaskan Way Viaduct serves a variety of users and trip patterns. Commuters to downtown are one of many user groups. The daily volumes shown in the updated Transportation Discipline Report (Appendix C) of the Final EIS include all trip types that would be made during the AM and PM peak hours, including commuters, non-work trips (shopping, school, etc.), and commercial trips (freight, delivery). Additionally, the viaduct carries both trips destined to downtown as well as trips between areas located on either side of downtown. In total, the viaduct carries about 20 percent of all north-south traffic traveling in central Seattle. The Final EIS Appendix C, Transportation Discipline Report, includes information regarding travel demand and travel patterns for the Alaskan Way Viaduct.

C-020-015

The lead agencies agree that maintaining freight mobility is vitally important for the region and have coordinated extensively with the Port of Seattle. Project design for each build alternative has considered freight mobility. Please see the Final EIS for current information about the proposed build alternatives and their potential effects on freight.

C-020-015 important that the existing infrastructure to the south is maintained and that a regional view to freight transportation is needed. Reliable and fast freight traffic is vital to our region's economy but clarity is needed on how much impact this project will have on businesses.

C-020-016 *Flexible Transportation Program:* People For Puget Sound advocates that this aspect of the project be enhanced. It is unclear how much the Viaduct/Seawall project will pay of the total cost of the Flexible Transportation Program. FlexPass programs (Appendix C, page 68), for example, include a cost to the company or to the employee. Also, no clear plan is presented to remove traffic volume off the viaduct and onto mass transit.

HABITAT

Habitat along the nearshore of Elliott Bay is high priority for People For Puget Sound. The nearshore habitat has been recognized as a critical element of the life cycle of salmon, especially for juvenile salmon.

Specific habitat-related concerns include:

- C-020-017** • The main text of the DEIS (page 33) does not mention the value of the shoreline habitat prior to urban development of the area and does not include the environment as an aspect of the proposal that is considered controversial (page 27). People For Puget Sound believes that environmental aspects, especially habitat, are high priority and are not being adequately enhanced by this project.
- C-020-018** • Appendix R (Fisheries, Wildlife and Habitat Discipline Report) notes that the water's edge is "the transition zone between the natural habitat of Elliott Bay and the highly urbanized habitat of Seattle." The new waterfront is an excellent opportunity to change this edge to a more transitional edge that will benefit both sides. The DEIS acknowledges that the Seattle waterfront is a migration corridor and rearing area for two endangered species, the Puget Sound Chinook salmon and the bull trout, which have both been observed. The report states oddly that "Chinook salmon spawn in the Duwamish River upstream from River Mile (RM) 11, which is many miles from the project area. Duwamish River Chinook Salmon are part of the Green River fall Chinook salmon stock. This stock is currently listed as healthy based on escapement levels. Young Chinook from other river systems have been collected along Elliott Bay shorelines." These statements minimize the importance of the Puget Sound nearshore habitat, which has been recognized as key habitat in the life cycle of salmon. Further, the Green River/Duwamish salmon population is projected to go into quasi-extinction levels (QEL) within 40-50 years if major changes are not made in the river and estuary (including the Elliott Bay nearshore) due to seriously declining trend of breeding stock.
- C-020-019** • Description of fish and other species, including recent actual counts along the waterfront, are limited. For example, on page 48, the DEIS does not mention that salmon from Long Fellow Creek that enters Elliott Bay, as well as the recent recognition that salmon from other areas of Puget Sound use the waterfront as part of their migration corridor.
- C-020-020** • On page 49 of the DEIS, the project is listed as 0.01 % of the overall watershed. This is misleading. The waterfront is a large percentage of the 13-mile long Elliott Bay shoreline (nearshore) and thus is significant.
- C-020-021** • The DEIS proposes that urban vegetation be planted in the waterfront corridor. People For Puget Sound requests that native vegetation be incorporated.

C-020-016

Since the Draft EIS was published in 2004, the transportation planning effort for construction has been greatly expanded. Updated information on proposed traffic mitigation strategies can be found in Appendix C, Transportation Discipline Report, of the Final EIS.

Typically, project costs are not included in environmental documents. We suggest you consult the project website (<http://www.wsdot.wa.gov/projects/Viaduct/>) for more information about project costs.

C-020-017

Existing conditions for the project do not include shoreline habitat prior to urban development. Urban development in the area removed natural shoreline habitat conditions by the early 1900s. The EIS process assesses potential changes to existing conditions and the cumulative effects of the project when added to other past, present, and reasonable foreseeable future projects. This project is not intended to restore the shoreline habitat of the Seattle waterfront, although habitat enhancement and mitigation are being considered as part of the design and environmental review process.

The desirability of restoring natural shoreline habitat was not identified as controversial, because there is a general desire by the lead agencies to enhance habitat conditions where feasible and appropriate. However, there are limited areas along the Seattle central waterfront to accommodate such natural habitat configurations. In addition, the project has also been redesigned, based on comments received throughout the NEPA process, to minimize the potential effects of the project on the marine environment, thereby potentially reducing the need for compensatory mitigation for project effects.

- C-020-022 • Appendix M (Archeological Resources and Traditional Cultural Places Technical Memorandum) indicates that the several of the tribes require protection of water and fisheries resources and habitat. We support their point of view.
- C-020-023 • The DEIS proposes that a new 33,000 square feet pier be built near Pier 48 to be used as a staging area in addition to proposed intertidal land being used for the tunnel alternatives. People For Puget Sound opposes any new pier construction in Elliott Bay as it shades the water and eliminates habitat. If WA State Ferries proposes building a pier for their expansion plan, that should be covered under a separate public review process. As noted in Appendix R (page 22), juvenile salmon were willing to pass under a detached section of pier but “showed a great reluctance to pass into the dark area beneath the wood pile-supported apron.” Finally, moving the tunnel alignment to the east would provide more opportunities for habitat improvements as well as eliminate the need to remove habitat from Elliott Bay.
- C-020-024 • Appendix R (page 2) does not mention that construction will start in 2005 for fish passage around Howard Hanson Dam and will be completed by 2007 – which will significantly increase spawning and rearing habitat for salmon and bull trout and thus will, we hope, increase the need for more nearshore habitat in the estuary, including Elliott Bay. Bull trout are targeted for recovery in Green/Duwamish and thus should be considered high priority for the waterfront as well.
- C-020-025 • Appendix R (page 2) states “The purpose of the proposed alternatives is to restore reliable transportation along the Alaskan Way Viaduct route and the structural integrity of the seawall to maintain its long-term structural support of the Alaskan Way Viaduct, Alaskan Way, and waterfront buildings.” The alternatives clearly do not consider habitat as a priority.
- C-020-026 • The proposed seawall will include additional “modified habitat” to be added to Elliott Bay but the project as a whole results in significant loss of habitat in Elliott Bay. Just adding riprap (Appendix R, page 41) as proposed is not adequate for habitat for the nearshore. The quality of this habitat needs to be further studied.
- C-020-027 • Will the public be given the opportunity to review the Biological Assessment and the Essential Fish Habitat analysis that is planned as part of the next phase of assessment (Appendix R, page 36)?
- C-020-028 • The DEIS proposes the new seawall to support the new viaduct structure and thus has not considered options for the seawall to support the waterfront alone under alternative options that were not considered (Appendix R (page 3)). We request that the construction of the seawall be studied as a stand-alone entity as part of new alternatives.
- C-020-029 • According to Appendix R (page 9), permit conditions for ESA listed species will include “gradual intertidal slopes, to the degree possible, fine grain substrate (mixtures of sand-gravel-cobble) and absence of shading on the restored habitat.” These are limited ideas and do not consider many other possibilities for providing habitat such as rocky intertidal, constructed bird islands, kelp beds, etc.
- C-020-030 • In spite of the current unfavorable habitat along the waterfront, juvenile salmon have been documented on the waterfront by Port of Seattle studies (Appendix R, page 23). The DEIS makes a great case as to the loss of habitat in the Duwamish estuary but does not provide a plan to help reverse that loss.
- C-020-031 • *Seawall improvement:* A critical aspect of the project that impacts Nearshore Habitat is the proposed new seawall. In areas where there is Pile-Supported Gravity Seawall,

C-020-018

The statements referred to in the Draft EIS are intended to provide background information on Chinook salmon likely to be present along the Seattle shoreline in order to clarify the issues, not to minimize the importance of Puget Sound shoreline habitat.

The Duwamish-Green River Chinook salmon stock has the highest rates of return of the various stocks within the Puget Sound Chinook salmon ESU (Weitkamp and Ruggerone 2000), indicating that it is less likely to go extinct in the next 200 years than Chinook salmon reproducing in other Puget Sound watersheds. While the nearshore environment is an important transition phase for Chinook and other salmonids, there are many other environmental conditions that affect their survival and the number of returning fish. The preferred alternative, which is the Bored Tunnel Alternative, minimizes effects to the shoreline habitat. Please see the Final EIS and Appendix N, Wildlife, Fish, and Vegetation Discipline Report, for current project information.

C-020-019

Species identified in the available literature and from surveys conducted along the waterfront have been updated and are included in the Final EIS. However, actual counts of fish included in these reports are not included in the EIS, as they were typically collected for purposes other than estimating population sizes or relative abundance.

Salmon produced in Longfellow Creek are not specifically mentioned because this stream is a tributary of the Duwamish-Green River, for which salmon are discussed as a whole. The identified alternatives would neither alter habitat conditions or salmon production in Longfellow Creek nor only affect fish for this creek. The use of the Seattle waterfront by salmonids from areas other than the Duwamish-Green drainage is addressed in Appendix N, Wildlife, Fish, and Vegetation Discipline Report.

C-020-031

Appendix B (Alternatives Description and Construction Methods Technical Memorandum, page 82) states "top portions of the unreinforced concrete gravity wall will be removed and replaced with sloping riprap material to create additional water surface area." In these areas, if the substrate is sound enough to hold riprap, then instead shallow habitat could possibly be constructed. People For Puget Sound requests that as much new habitat as possible be constructed along the seawall. In other areas, a precast concrete fascia panel is proposed to be attached to the seaward side of the newly constructed Type A seawall. This fascia panel, as it is just an attachment, could be an innovative treatment with slopes, terraces and other features to create shallow water habitat (4 inches as the tide rises and falls). People For Puget Sound requests that innovative ideas be developed, and perhaps a pilot study completed, to look at ways to create artificial habitat attached to or part of the new seawall.

C-020-032

- Seawall concern: In Appendix U (Hazardous Materials Discipline Report, says that in Type B Seawall, the relieving platform holds up the seawall face, so it is unclear how a new wall could be built on the east side of this without a collapse of the existing wall face leading to serious water quality concerns.

C-020-033

What People For Puget Sound strongly recommends for habitat improvements along the waterfront includes:

- Use of native, including overhanging vegetation along the water's edge to provide insects, leaf debris, woody debris for migrating fish as well as other wildlife,
- Elimination or reduction of overwater coverage of shallow nearshore zones.
- Elimination of overwater parking and associated water quality problems.
- Inclusion of shallow water habitat such as beaches. Pocket and perched beaches, similar to those in Alki, would be appropriate along the waterfront. In Vancouver BC, there are cutouts in the seawall that allow water to flow into perched beaches.
- Inclusion of intertidal rocky habitat, bird islands, and other types of habitat is desirable.
- Innovative treatments along the seawall to create artificial habitat
- Creation of kelp forests and other deeper water habitat
- Clean water and sediment to support quality habitat

WATER AND SEDIMENT QUALITY

Protection of and improvement of water and sediment quality along the waterfront is critical to Elliott Bay. Specific concerns are:

C-020-034

- *Lack of inclusion of all impaired waters:* Appendix S (Water Resources Discipline Report) considered the 1998 303(d) list for water and did not include consideration of the draft 2002/2004 list that will be adopted prior to the Final EIS. In addition, the sediment listings are not clearly included in the DEIS even though many of the sediment problems in Puget Sound waters are due to sources related to stormwater and combined sewers.

C-020-035

- *Groundwater Flow:* Appendix T (Geology and Soils Technical Memorandum) notes that areas along the seawall will be filled with grout. Where will groundwater flow be redirected?

C-020-036

- *Problems with soil grouting:* Grouting might result in gaps and irregularities in soil area (especially as obstructions are encountered (Appendix T, page 111)), might flow into

C-020-020

This statement in the EIS provides information on the drainage area within a discussion of existing water quality conditions in the Duwamish River, Elliott Bay, and Lake Union. This section is not intended to address shoreline habitat or its significance. Please see the Final EIS for an updated discussion about the existing conditions of the shoreline habitat in the project area.

C-020-021

The lead agencies agree that it is desirable to plant native vegetation where practical; however, no upland habitat restoration or enhancement is currently included in the project, and most vegetation planted as part of the project will be ornamental. Plant species will likely be selected for properties such as form, color, flowers, and height/spread at maturity that is appropriate to the needs of specific environments. Plants will also be selected as part of the city's ongoing effort to create sustainable landscapes, with emphasis on low water use, tolerance for urban conditions, and ability to provide environmental benefit, such as shading. Many native plants possess these qualities, and they will be considered as part of the project's ongoing urban design process.

C-020-022

Your support of tribal protection for water and fisheries resources is acknowledged. The project has and will continue to consult with the interested tribes about cultural resource issues and natural resource issues.

C-020-023

The project no longer proposes to construct a permanent 33,000-square-foot pier near Pier 48.

- C-020-036** Elliott Bay, and could cause additional loads on seawall, leading to failures. How will this be prevented?
- C-020-037** • *Stormwater concerns:* The chemicals of concern outlined in Appendix S are zinc, lead, copper, PAHs, and TSS. Phthalates should have been included on this list as they are a problem in Elliott Bay, as noted in the Appendix. Recent work by the City of Seattle has shown that traffic and roadways are an important source of this emerging contaminant of concern.
- C-020-038** • *PAHs:* More work is needed to show that the project will be able to mitigate for PAHs – a contaminant of concern. Appendix S states “The removal rates for PAHs is not available at this time.”
- C-020-039** • *Best Management Practices:* No specific stormwater treatment Best Management Practices are listed in the document and so the public has no way to access if these Best Management Practices are appropriate for this site and the level of their potential effectiveness.
- C-020-040** • *Construction staging:* Planned staging areas, where spills, soil stockpiles and more will occur, will be over the water according to the DEIS. People For Puget Sound strongly opposes using an overwater location for staging.
- C-020-041** • *Impacts on Duwamish River:* The DEIS includes a plan to accelerate the construction of Royal Brougham Treatment Plant. If this project is not funded by Viaduct/Seawall funding, then King County might fund this project sooner and thus postpone construction of the important Hanford Combined Sewer Project that will allow for continued water quality problems in the Duwamish River (page 101 of Appendix S). People For Puget Sound opposes any projects that will delay cleanup of the Duwamish River.
- C-020-042** • *Sediment Quality:* People For Puget Sound believes that cleanup of contaminated sediment in Elliott Bay, particularly along the waterfront, should be a priority. This area is a fish migration corridor for endangered species and is habitat for a number of other species. Any site proposed for inclusion in this project located within Elliott Bay must include a cleanup of the site-specific sediments.
- C-020-043** • *Stormwater Management:* It is unclear that the combined sewer system will be able to handle 38 million gallons more stormwater gallons per year. The statement in Appendix S that “the proposed project will treat stormwater, either approach will reduce the total amount of pollutant load from the project area relative to existing conditions” does not take into consideration the potential negative impact of combined sewer overflows that occur because of an extra load on the system. For flows south of Columbia Street, Appendix S states that the Royal Brougham Treatment Plant will be constructed “earlier than planned and enlarged by 11 percent” to handle this flow. It is currently not planned for construction until 2030.” The DEIS does not provide the guarantee that it will be constructed, the proposed date, and the funding. People For Puget Sound strongly supports treating contaminants at the source - not continuing to increase loads into the Combined Sewer System, which involves significant capital expenditures. North of Columbia, a higher volume of stormwater flow will be directed to existing Combined Sewer systems with no upgrade proposed. As stated in Appendix S, Best Management Practices have removal efficiencies of 58-65 % for copper and zinc. This does not constitute adequate treatment. Overall, we do not see innovative or far-reaching proposals for management of stormwater in the DEIS.

The preferred alternative analyzed in the Final EIS has an alignment to the east and eliminates the need to remove habitat from Elliott Bay.

C-020-024

The construction of fish passage facilities at Howard Hanson Dam is an independent action that would provide access to additional anadromous salmonid habitat within the Duwamish-Green River basin. The additional spawning and early rearing habitat may increase the number of juvenile anadromous salmonids produced in the river system and therefore the number using Puget Sound shorelines, including Elliott Bay.

The Seattle waterfront is unlikely to provide habitat of particular importance to bull trout, particularly along the vertical seawall. Anadromous bull trout in Puget Sound appear to congregate where forage fish are available. These areas include eelgrass beds and upper intertidal sandy beaches where the forage fish spawn. No habitat of this nature currently exists, or is likely to be constructed in the future, along the Seattle waterfront where the vertical seawall is present. However, other portions of the Elliott Bay shoreline currently provide or could provide these desirable habitat characteristics, and they present habitat restoration or mitigation opportunities for this project and other actions in the area. With the preferred Bored Tunnel Alternative, the replacement of the seawall is being addressed by the separate Elliott Bay Seawall Project being led by the City of Seattle.

C-020-025

The purpose and need statement has been updated since the publication of the Draft EIS in 2004. The revised purpose for the project is to provide a replacement transportation facility that, among other things, meets current seismic standards and improves traffic safety. As such, the primary purpose of the project is related to providing a safe transportation facility. However, the purpose and need statement in no way precludes enhancing habitat as part of the project. Habitat

HUMAN HEALTH AND ENVIRONMENTAL JUSTICE

Human health and environmental justice must be addressed in the new waterfront:

C-020-044 *Environmental Justice Appendix:* Federal Law and US Department of Transportation requires that environmental justice principles be incorporated into this project. According to Appendix J (Environmental Justice Technical Memorandum), 25% of the population in the project area is below the poverty line and 49% have no vehicle available to the occupants of the dwelling. With statistics of that nature, it is clear that the proposed alternatives will create a significant disproportionate negative impact on the local population compared to the benefit of more distant residents and commuters. Local residents will be impacted by the noise of pile driving and other construction impacts as well as long-term air quality and other negative health impacts. In this appendix, noise not listed as a major impact during construction. Recent sheet piling installation at the Port of Seattle's Terminal 90-91 had a huge negative impact on the surrounding neighborhoods and similar impacts would be expected from the viaduct project, especially if work will be on a 7-day, 24-hour basis. Were the organizations interviewed not informed of the significant noise, dust and other construction impacts that will occur? In Appendix J, only *perceived* impacts were listed, whereas in Appendix I (Social Resources Technical Memorandum) *actual* impacts, such as noise levels were described. In the final EIS, these two appendices should be combined so that more on-the-ground impacts can be included in the Environmental Justice analysis.

C-020-045 *Environmental Justice and Seattle Highways:* Graduate student, Gail Sandlin at the University of Washington is researching land use patterns within the context of environmental justice with a particular interest in populations that reside within proximity to limited access freeways. Freeways with heavy traffic act as pollutant line sources and there is a growing body of epidemiological evidence that suggests that populations at risk to exposure to mobile source pollutants tend to be low-income and minority populations. A preliminary examination of the U.S. Census Bureau demographic block group level data indicates that there is a high distribution of low-income and minority populations that reside within the epidemiological surrogate exposure distance of 100 to 400 meters from the Alaskan Viaduct. This finding suggests that a more thorough environmental justice assessment may be warranted.

C-020-046 *Human Aspect of Waterfront:* A high quality pedestrian environment is needed for a vibrant, safe, and thriving waterfront. The waterfront is the 2nd most visited attraction in Seattle (approximately 4.2 million visits in 1999) (Appendix D, Visual Quality Technical Memorandum, page 53) and the potential for an excellent connection between Pike Place Market and the waterfront near the existing Aquarium Building could create the core of a vital new waterfront.

A new study that shows that people who live in areas where they have to rely on their car tend to weigh significantly more than people in areas with easy access to stores. (The Seattle Times, May 31, 2004, Study Links sprawling suburbs, sprawling waistlines). We need to get people out of their cars and walking.

enhancements have been considered throughout the life of the project for the build alternatives that would include replacement of the seawall, and the lead agencies have involved and included resource agency staff in project discussions since the project began in 2001. Resource agencies have been involved in developing and approving the project's purpose and need statement, reviewing the alternatives, and approving proposed habitat mitigation and enhancement measures for the project.

C-020-026

This comment is not a correct characterization of the alternatives assessed in the 2004 Draft EIS. Four of the five alternatives assessed increase the amount of aquatic habitat along the Elliott Bay shoreline. Only the Bypass Tunnel Alternative resulted any loss of Elliott Bay habitat (1,549 square feet). All existing shoreline habitat in the project area is highly modified concrete, steel, Ekki wood seawall, riprap, or dredged waterway. Most alternatives discussed in the 2004 Draft EIS actually produce a substantial increase in the quantity of aquatic habitat. Only alternatives that include construction seaward of the existing seawall result in the loss of habitat, primarily in the small area between Pier 48 and Colman Dock. However, based on comments received on the 2004 Draft EIS and the 2006 and 2010 Supplemental Draft EISs, the alternatives assessed in the Final EIS (including the preferred alternative) eliminate in-water construction activities that would result in the permanent loss of shallow water habitat in the area.

The preferred alternative in the Final EIS, the Bored Tunnel Alternative, does not include replacement of the seawall. If the preferred alternative is selected, the seawall would be replaced under a separate project, the Elliott Bay Seawall Project, led by the City of Seattle. If another build alternative is selected, the seawall would be replaced as part of that alternative. See the Final EIS for current information about the proposed seawall design for the Cut-and-Cover Tunnel Alternative and Elevated Structure Alternative.

C-020-047

Deficiency in Parks: In downtown Seattle, there is a deficiency in parks and in green space, particularly in Bell Town, Pioneer Square and the Commercial Core. As noted in Appendix H (Parks and Recreation Technical Memorandum), "estimated growth in population and employment will result in a 26-acre deficiency in parks in downtown" by 2014. The mayor wants to double the population of downtown from 33,000 to 66,000 people in the next twenty years. That increased population will need green space for refuge from urban life, playgrounds and other facilities for children, a reduction in the urban heat island effect, as well as increased alternative stormwater treatment in order to protect the health of Elliott Bay.

C-020-048

Noise: Noise from the above ground alternatives is a major negative impact on humans at the waterfront. Appendix F (Noise and Vibration Discipline Report) projects that peak traffic noise at the Seattle Aquarium in 2030 for the surface, rebuild, and aerial alternatives would be 74-75 dBA at Colman Dock, 70-71 at Waterfront Park and 73-73 at Seattle Aquarium. Exhibit 2-4 shows that 70 dBA is the sound level of highway traffic at 50 feet (equivalent to a Lawn mower at 50 feet) and 75 dBA is the sound level of a train at 50 feet (equivalent to a blender at 3 feet). Currently, it is extremely difficult to hear others speak at the waterfront when in the vicinity of the viaduct (for example, Mayor Greg Nickel's speech at the waterfront in the summer of 2003 – we could barely hear him and he was speaking into a microphone). Tests of noise levels with the viaduct open and closed (exhibit 3-1) show that the noise at the waterfront is at least 10 dBA lower when the viaduct is closed:

<u>Location of test</u>	<u>Decrease in noise level when Viaduct closed</u>
Sidewalk east of Viaduct between Seneca and Spring:	17 dBA
Seneca Street between Western Ave and Viaduct:	12 dBA
Waterfront Park boardwalk:	12-13 dBA
Waterfront Park sidewalk:	6 dBA
Harbor Steps:	6 dBA
Waterfront Landing Condos:	13 dBA
Victor Steinbrueck Park:	19 dBA

To the human ear a 10 dBA decrease is as if the noise has been halved (Appendix F, page 5).

During construction, one can expect constant (24 hours, 7 days a week) noises that will include extreme noises such as 95-99 dBA (driven piles at 50 feet) and 115 dBA (driven sheet pile at 50 feet).

People For Puget Sound strongly recommends that the solution for the waterfront eliminate the noise of the viaduct and that construction noise be carefully mitigated.

C-020-049

Air Quality: Appendix Q (Air Quality Discipline Report) calculates predicted 2030 1-hour average intersection CO concentrations for intersections but does not present similar calculation for portal exits or ventilation stacks (only 8 hour average, page 53) and does not clearly state the comparison in the Appendix (exhibit 6-5 shows emission rates). Why was the peak hour data not presented? Appendix Q states that the lowest height (page 47) for the ventilation stacks - that would not result in exceedence of air quality standards - is 12 feet above the 30 feet high ventilation buildings. Does this mean that standards would be exceeded at a lower elevation?

C-020-027

Endangered Species Act (ESA) documentation, including Biological Assessments, become available to the public following completion of the Section 7 ESA consultation process. ESA documents are not part of the NEPA documentation, and thus they are not distributed to the public in the same manner. If you would like to request a copy of the Biological Assessment, please contact the project office. Final EIS Appendix U, Correspondence, includes the Biological Opinion letter from the National Marine Fisheries Service and ESA consultation letter from the U.S. Department of the Interior, Washington Fish and Wildlife Office.

C-020-028

The preferred Bored Tunnel Alternative does not include the replacement of the seawall. If selected, replacement of the seawall would occur under the separate Elliott Bay Seawall Project led by the City of Seattle. With the Cut-and-Cover Tunnel and Elevated Structure Alternatives, the seawall would be replaced as part of the project.

C-020-029

The habitat characteristics discussed in the 2004 Draft EIS Appendix R are simply general habitat characteristics likely to be employed in developing habitat mitigation and enhancement and not intended to be specific proposals. However, Attachment D to Appendix R listed conceptual alternatives previously identified for habitat improvement through the environmental analysis.

The proposed build alternatives have been modified since the publication of the 2004 Draft EIS to further minimize effects to aquatic habitat. Please see the Final EIS and Appendix N, Wildlife, Fish, and Vegetation Discipline Report, for current information about potential project effects on aquatic habitat and proposed mitigation measures.

C-020-049 | What is the total pollutant load for the area? More information is needed for the public to assess the impacts of air pollutants from the proposed portals and the vents.

SUSTAINABLE ASPECTS OF THE PROJECT NEED TO BE STRENGTHENED

The City of Seattle strongly supports sustainable principles to guide its future growth. Many aspects of this proposed project could be strengthened to help conserve resources and support sustainable practices:

C-020-050 | *Energy Consumption:* Appendix V (Energy Technical Memorandum) does not explore sustainable methods for energy conservation for the project. For example, the DEIS assumes the use of supply and jet fans for ventilation for tunnel alternatives. No mention is made of designing the overall project to take advantage of natural airflow in the area or configuring the tunnel and intake or out-take locations to maximize the natural attributes of air flow at the site. Careful planning and study, similar to that being done for the Freedom Tower in New York City, by Guy Battle, could reduce energy costs and could also minimize air pollution from vent stacks to downtown. People For Puget Sound advocates the use of bigger picture, sustainable planning for the entire project to increase conservation, improve efficiencies, and minimize or eliminate human and wildlife impacts.

C-020-051 | *Air Pollution:* The DEIS does not state that low sulfur or biodiesel fuels must be used during construction.

C-020-052 | *Big Picture Transportation Solution:* Appendix V indicates that the vehicle miles traveled in Puget Sound region increased nearly three times faster (71%) than population (15%) and employment (34%) from 1981 to 1989, due in part to rise of two-worker families, and has grown at a rate (26%) more similar to the rise in population (19%) and jobs (27%) during the 1990's. People For Puget Sound would make the argument that the rise in vehicle miles traveled is due to urban sprawl. The project alternatives, including the surface option, allow for increasing capacity in the downtown corridor. A significant big-picture effort is not made to completely revamp how commuters get to downtown, especially from distant suburbs.

C-020-053 | According to a recent article in *The Stranger*, in a study of "transportation costs in 28 metropolitan areas, Seattle households spend more on transportation (17.1 percent of the family budget) than on food, utilities, or healthcare, more in fact than on any other line item except housing." The City of Seattle and the State can take steps now to address this problem.

C-020-054 | *A Waterfront For The Future:* People For Puget Sound requests that restoration of the waterfront become a priority for the project. We cannot afford to pass our degraded waterfront along to the next generation.

C-020-030

The preferred alternative does not include the replacement of the seawall. However, for the other build alternatives, the seawall replacement portion of the project is located outside the Duwamish River estuary; therefore, it does not specifically address habitat restoration needs in the Duwamish River estuary.

The effects of the project build alternatives were evaluated based on changes from existing habitat conditions and not based on differences from historic conditions. The unfavorable Seattle waterfront conditions identified in this comment have been used by juvenile salmon for nearly 100 years and are the result of extensive commercial uses of the waterfront. While it is desirable to improve the habitat conditions in the area, the Alaskan Way Viaduct Replacement Project will not result in altering the primary commercial focus of the Seattle waterfront. The potential effects of the project, especially with the preferred alternative, do not warrant mitigation levels that would approach reversing the habitat losses resulting from previous habitat modification projects in the area. Habitat restoration and mitigation measures for the preferred alternative are provided in Appendix N, Wildlife, Fish, and Vegetation Discipline Report, of the Final EIS.

C-020-031

The preferred alternative does not include the replacement of the seawall. However, the seawall would be replaced with the Cut-and-Cover Tunnel Alternative or the Elevated Structure Alternative. The project alternatives have evolved since the publication of the Draft EIS in 2004. See the Final EIS and Appendix B, Alternatives Description and Construction Methods Discipline Report, for current information about seawall construction.

Specific mitigation and habitat enhancement options will be identified

through additional agency coordination, the evaluation of potential project effects, and development of the project design.

C-020-032

Additional measures would be required to provide stability and support of the existing seawall during construction. These measures could be external bracing and a prescribed wall construction that supports the existing wall. See Appendix B, Alternatives Description and Construction Methods Discipline Report, of the Final EIS for current seawall construction information for the Cut-and-Cover Tunnel Alternative and Elevated Structure Alternative. The Bored Tunnel Alternative, which is the preferred alternative, would not replace the seawall.

C-020-033

Thank you for these suggestions. The project team biologists and engineers have considered these suggestions for increasing habitat value and functions along the seawall in the design process. These concepts were also incorporated into the discussions with the resource agencies and other interested parties for developing the mitigation measures (see Chapter 8 of the Final EIS). Note that since the publication of the 2004 Draft EIS, the lead agencies have refined the proposed build alternatives to greatly minimize effects on shoreline habitat. The proposed mitigation measures reflect this reduced level of effect.

C-020-034

The Final EIS Appendix O, Surface Water Discipline Report, includes the impaired water bodies in the study area that are listed in Ecology's *2008 Washington State's Water Quality Assessment [303(d)]*. Nearshore sediments and sediment quality in Elliott Bay are described in Chapter 4 of Final EIS Appendix O. All of the alternative would potentially result in a benefit to surface water and sediment quality in the study area receiving

waters because they would decrease the pollutant load relative to existing conditions.

C-020-035

Shallow groundwater would flow laterally along the grouted portions of the seawall to areas where groundwater can discharge into Elliott Bay. Deeper groundwater would flow in a similar manner or, if the soil conditions allow, flow underneath the grouted portions and flow into Elliott Bay.

C-020-036

Please note that seawall replacement is not part of the preferred Bored Tunnel Alternative. Where seawall replacement is required for the project and in areas with grouting, it is possible some gaps and irregularities may occur. The extent of such gaps will be determined during test sections and during construction monitoring. Based on this information, the construction methods will be adjusted to meet design criteria for seawall stability. Potential for grout flow into Elliott Bay could be mitigated by:

1. Use of directional grout nozzles in areas adjacent to the seawall.
2. Use of appropriate setback from seawall.
3. Sealing of known seawall defects and utility penetrations.
4. Use of sheeting and/or silt curtains to contain potential grout flow.

C-020-037

WSDOT's Environmental Procedures Manual was used for the pollutant loading analysis. This method evaluates loads for TSS, Total Copper, Dissolved Copper, Total Zinc, and Dissolved Zinc, because they are representative of pollutants found in stormwater runoff. Phthalates were not evaluated for the Final EIS.

C-020-038

WSDOT's Environmental Procedures Manual was used for the pollutant loading analysis. This method evaluates loads for TSS, total copper, dissolved copper, total zinc, and dissolved zinc, because they are representative of pollutants found in stormwater runoff. PAHs were not specifically evaluated for the Final EIS.

Polycyclic aromatic hydrocarbons (PAHs) that settle on the roadway from atmospheric deposition may become part of stormwater runoff. However, in a study conducted by Caltrans, PAHs were a low monitoring priority because they were either never detected or had an estimated percent exceedance with California standards of <0.01% in untreated stormwater

(http://www.dot.ca.gov/hq/env/stormwater/special/newsetup/_pdfs/new_technology/CTSW-RT-01-050.pdf).

PAHs that become part of runoff are expected to adsorb to suspended solids and sediment. In general, PAHs with higher molecular weights are almost completely adsorbed onto fine particles and are expected to be immobile in soil. BMPs that filter or settle out particulate matter may be effective at removing PAHs from runoff.

C-020-039

Stormwater will be managed in accordance with the applicable stormwater management regulations as described in the Final EIS. Specific BMPs will be identified during the design phase of the project.

C-020-040

There are very limited opportunities in the tightly constrained corridor where construction staging can be located. Please see Chapter 3 in the Final EIS and Appendix B, Alternatives Description and Construction Methods Discipline Report, for a description of the proposed construction staging areas for the build alternatives. Most of the staging areas and

activities will not be overwater; however, for all of the build alternatives there may be some activities that occur overwater such as storing construction materials on Pier 48 and loading excavated material onto barges at Terminal 46. Permits would be required for any overwater areas, and the responsible agencies would require mitigation, such as construction debris or sediment containment methods, to avoid potential effects to water quality.

C-020-041

A treatment facility at Royal Brougham Way S. is not proposed as part of this project. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach presented in the 2004 Draft EIS.

C-020-042

Where the project build alternatives involve the potential disturbance of contaminated sediment, appropriate best management practices will be implemented to minimize the potential effects on aquatic species. The improvements to stormwater treatment proposed with the project will improve general water quality conditions in Elliott Bay by further reducing contaminants discharged to the bay.

C-020-043

A treatment facility at Royal Brougham Way S. is not proposed as part of this project. Based on detailed modeling, continued design, and coordination efforts, a single approach to stormwater management is now being proposed for all of the alternatives evaluated in the Final EIS. This alternative is described in Appendix O, Surface Water Discipline Report, of the Final EIS and is most similar to the BMP Approach

presented in the 2004 Draft EIS.

Specific BMPs will not be determined until later in the design and permitting process. Both the WSDOT and Ecology Manuals have several BMPs that meet the requirements of Basic Treatment; however, wet vaults and StormFilters(TM) are the most feasible options due to space and engineering constraints. In addition to basic treatment, oil control will also be provided along Alaskan Way between King and Yesler Streets because of the predicted ADTs (Average Daily Traffic volumes).

C-020-044

Construction impacts were the major topics of discussion with the community service organizations. The Social Discipline Report, Appendix H of the Final EIS, concludes that there is the potential for disturbance impacts, such as noise, on nearby residents, but that these do not appear substantially adverse. The project will continue its coordination with these organizations throughout construction.

As this comment requests, Appendix I and Appendix J of the 2004 Draft EIS were combined into one discipline report for the Final EIS. This appendix is Appendix H, Social Discipline Report, mentioned previously in this response.

C-020-045

The nature of populations along the project corridor is discussed in the Final EIS Appendix H, Social Discipline Report, and information on Mobile Source Air Toxics is provided in Appendix M, Air Discipline Report. Both low-income and minority populations are present, and potential effects on these populations have been considered. In the Final EIS, Chapter 5 discusses permanent effects and Chapter 6 discusses construction effects for low-income and minority populations as well as for air quality.

C-020-046

The project has worked closely with the City of Seattle as one of the project's lead agencies, and recognizes that a quality pedestrian environment is one of the major objectives of the City of Seattle's waterfront planning initiative, which is an ongoing effort.

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel Alternative and evaluated in the 2006 Supplemental Draft EIS. It was included in the project, due in part to numerous 2004 Draft EIS public comments requesting the lead agencies to consider a lid in the Pike Place/Belltown area. The proposed lid would extend north from where SR 99 emerges from the tunnel's north portal near Pine Street to Victor Steinbrueck Park near Virginia Street. The design for this lid structure with the current Cut-and-Cover Alternative is described in this Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.

C-020-047

Meeting the City of Seattle goals for parks and open space is outside of the scope of this project. The Alaskan Way Viaduct Replacement Project does not include specific plans for new park and recreation facilities or specific waterfront amenities, because the purpose of the project is first to provide a transportation facility with improved earthquake resistance.

The Final EIS and Appendix H, Social Discipline Report, discuss the existing park and recreation facilities and assess the potential impacts of the alternatives on existing facilities in the project vicinity. With the preferred alternative, the Bored Tunnel Alternative, the exact configuration and types of activities provided on the waterfront will be decided over the next several years by the City-led Central Waterfront Project.

C-020-048

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative. This alternative would remove the elevated viaduct structure and result in less noise along the waterfront corridor.

Also, to reduce construction noise at nearby receptors, mitigation measures such as those discussed in the Final EIS Appendix F, Noise Discipline Report, would be incorporated into construction plans, contractor specifications, and variance requirements.

C-020-049

The Final EIS includes the maximum 1-hour CO concentration near the tunnel portals and tunnel operations buildings, which include the ventilation stacks, for the build alternatives.

"12 feet above the 30 feet high ventilation buildings" refers to the results of the ventilation stack analysis, which is that air quality standards would not be exceeded at any ground level or elevated receptor sites, as long as the exhaust air is released from a height that is at least 12 feet above the roofs of the (30-foot-tall) ventilation buildings. This analysis was conducted to determine minimum stack height requirements.

C-020-050

The analysis of energy consumption focuses on the amount of energy that would be consumed during construction and operation of the build alternatives. However, some of the key considerations of the lead agencies when identifying the preferred alternative were the degree to which the build alternatives would provide opportunities to minimize or eliminate effects to the human and natural environment.

C-020-051

The lead agencies will encourage the contractor to use low- or ultralow-

sulfur fuels in construction equipment. Please see Chapter 8 of the Final EIS for the proposed mitigation measures to reduce effects on air quality during project construction.

C-020-052

This proposed build alternatives do not propose to add capacity to the existing SR 99 corridor. Current information about the build alternatives and how they would operate is provided in the Final EIS. Transportation study and planning for how commuters from the suburbs enter downtown is outside the scope of the Alaskan Way Viaduct Replacement Project.

C-020-053

Making transportation affordable and maintaining mobility effectively is a priority for the lead agencies.

C-020-054

With the Cut-and-Cover Tunnel or Elevated Structure Alternatives, the lead agencies would improve and enhance habitat where practicable and feasible along the new seawall. With the preferred Bored Tunnel Alternative, the seawall would be replaced by a separate project (Elliott Bay Seawall Project) led by the City of Seattle. The lead agencies recognize that habitat mitigation and enhancement measures make a long-term contribution toward improvement of the marine environment.

PEOPLE'S WATERFRONT COALITION

THE CITIZENS' ALTERNATIVE TO REBUILDING SEATTLE'S VIADUCT

**Alaskan Way Viaduct and Seawall Replacement Project
Draft Environmental Impact Statement Response**

Seattle, May 28, 2004

Dear Viaduct and Seawall Replacement Project Team,

Thanks for the opportunity to respond to your EIS. It is a well-written and thorough document, and your project managers have been consistently open and helpful in educating the public.

The Viaduct and Seawall Draft EIS is insufficient.

The scope of the transportation project is too narrowly defined. The Draft EIS only analyzes solutions that replace current capacity with a new highway in the same corridor, on Seattle's shore. This narrow scope precludes study of an alternative that is considerably cheaper, simpler, and less disruptive, and that offers Seattle the opportunity to reconnect to the shore. An alternative that makes improvements to the larger transportation system -- arterial connections, transit, the express lanes and entrances and exits on I-5, freight corridors, and the downtown grid -- while keeping Alaskan Way as a typical 4-lane surface street should be analyzed concurrently in a supplemental EIS.

This alternative would define the optimal set of improvements to existing resources so they can accommodate Viaduct freight and vehicle traffic, away from the shore. It would also include fixes to the street grid north of the Battery Street tunnel to redistribute traffic, both north/south and east/west. The Seattle Department of Transportation's Central City Access Strategy and the People's Waterfront Coalition Proposal (www.peopleswaterfront.org) offer a great beginning framework that should then be developed into a comparable alternative.

The Draft EIS is premature because Seattle has not decided to replace the Viaduct.

A waterfront planning process is currently underway, guiding the citizens and the City of Seattle in defining the long-term future for Seattle's newly freed shore. Citizens are thrilled to recognize the scale of this opportunity for Seattle to reconnect to the water, and are demanding parks, beaches, water-based recreation, and pedestrian primacy. The citizens of Seattle have not concluded that a new highway is the most appropriate use of precious shore lands.

Recasting this profound opportunity as a transportation crisis and rushing to rebuild a highway before reviewing and analyzing the potential long-term benefits of alternative uses is short-sighted and wasteful. Possibilities for significant improvements in the City's quality of civic life, economy, and ecology are just now being compared and studied. The potential long-term benefits of alternative futures for the public waterfront land will be aborted by a highway megaproject. Other cities have taken advantage of similar conditions, and decided not to rebuild transportation infrastructure on their shores, to the long-term benefit of their communities and economies.

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C-021-001

C-021-002

C-021-001

An EIS evaluates alternatives for their ability to accomplish a project's purpose. This project's purpose includes protecting public safety and providing sufficient capacity to efficiently move people and goods to and through downtown Seattle. In addition to the alternatives presented in the 2004 Draft EIS, the 2006 Supplemental Draft EIS evaluated the revised Tunnel and Elevated Structure Alternatives and the 2010 Supplemental Draft EIS evaluated the Bored Tunnel Alternative. Improvements made to accommodate transit, freight, and traffic on the downtown street grid during construction have been studied as described in the Final EIS Appendix C, Transportation Discipline Report. Many of these improvements would remain in place once construction is completed. The alternative you suggest for the central waterfront and larger transportation system has been considered and does not address the need for improvements or the purpose of this project. The lead agencies developed this propose and need after listening to public comments following the Nisqually earthquake in 2001 and most recently revised it following the Partnership Process in 2007.

C-021-002

The City of Seattle is one of the three lead agencies for this project, as well as being responsible for planning regulation of uses along the Central Waterfront. As a lead agency, the City supports the project's purpose to provide a replacement transportation facility. The City has also integrated planning and design on this project with the Central Waterfront Project. In short, neither effort has been rushed or moved ahead without careful analysis. The build alternatives carried forward are those that meet the project's purpose.

The Seawall Replacement project should proceed without the Viaduct.

C-021-003 Unlike the Viaduct project, the Seawall project is urgent because of ongoing degradation and safety and reliability concerns. It should be separated out as a project and its completion pursued with appropriate urgency.

The EIS reveals multiple intolerable impacts to Seattle's economy and quality of life that add up to an unbearable cost.

All Options

- C-021-004**
- The extended construction period will inflict terrible economic loss to hundreds of local businesses, and dismal degradation to quality of life downtown. 7.5 to 11 years of 24-hour-a-day construction will be unbearably disruptive to the local economy, and decimate the 1200 businesses within a block of the project. "The strong will survive, and the marginal won't" is the brutal forecast for these businesses by planners.
- C-021-005**
- Construction mess, noise, and detours will make visiting the shore so inconvenient that citizens and tourists will likely avoid the area completely. An important part of our tourism economy will be starved out.

Aerial Option

- C-021-006**
- Erecting a temporary viaduct for the years it takes to actually construct a new permanent viaduct is a terrible idea. It extends the dark, scary, noisy experience of being under the current viaduct, destroys pedestrian comfort in the area, and will ward off all but the most committed visitors.
 - It is an unbelievable waste of resources, time and money to build a temporary highway and then tear it down.

Tunnel Option

- C-021-007**
- The mouth of the highway tunnel next to Pike Place Market would denigrate the quality of life and long-term potential of this important cultural and economic resource. It is an awful location for a noisy, dirty tunnel entrance.
- C-021-008**
- The mouth of the highway tunnel next to Pioneer Square cuts off Seattle's first neighborhood from future connections to the shore. It prevents achievement of the long-term vision for more waterfront presence, as described in the neighborhood plan.
- C-021-009**
- The aerial structure between the tunnel mouth and Battery Street tunnel mouth acts as a barrier between Belltown and the waterfront.
- C-021-010**
- The tunnel options do not allow the connection to the shore and the open space opportunities many citizens are expecting. Because of the primacy given to vehicular movement, there is more pavement than exists now, and insufficient space on the surface for development of civic and recreation destinations.

Surface Option

- C-021-011**
- The surface alternative displaces up to 20 buildings and 581 jobs: too many.
 - The surface option includes up to 10 lanes of pavement for vehicle flow, parking, and local access lanes. This consumes practically the whole width of the available space for transportation, creating a terrible environment for pedestrians, waterfront businesses, and anyone wanting to get close to the water.
 - The surface option should include fixes to the larger transportation system, so that congestion does not adversely impact transit service.

C-021-003

The Bored Tunnel Alternative, which is the preferred alternative, is independent of seawall replacement. The City of Seattle recognizes the vulnerability of the Elliott Bay Seawall and is pursuing its replacement as an independent project with the Army Corps of Engineers. If one of the other build alternatives is selected, the seawall would be replaced as part of the alternative.

C-021-004

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

C-021-005

It is acknowledged that direct traffic impacts could result in secondary economic impacts to the businesses along the corridor by decreasing the number of customers willing to patronize those businesses.

Impacts on tourist-dependent areas (Pioneer Square, Central Waterfront, Pike Place Market, Seattle Center) vary between the build alternatives. Economic impacts to these tourist-dependent areas are a serious project consideration during construction. The Final EIS presents economic mitigation strategies developed from evaluating the use and success of these strategies on other projects of similar size and complexity.

Seawall

C-021-012

- The seawall project should include far more significant measures to create a functional shore ecology and viable marine habitat, and to assist juvenile salmon traversing this important migration corridor.

C-021-013

The Construction Approach

- Keeping the viaduct in operation during construction extends the construction period and expands the total cost. An alternative approach should be analyzed that fixes the larger transportation system before the viaduct is closed, to accommodate traffic in the larger system, and allow a shorter and less expensive construction process.

C-021-014

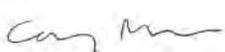
The citizens of Seattle are quickly beginning to understand that we probably do not really need a new highway, cannot afford the terrific risks and costs of this megaproject, and that we should not waste this opportunity to reconnect to our valuable shore. What is the best solution for Seattle? None of the above. These five alternatives might represent the best thinking for a narrowly defined state highway project, but not for the future of Seattle. The direct impacts to the economy, to quality of life, and to the health of Elliott Bay, combined with the cost of lost opportunities for this valuable land, add up to an unconscionable cost per vehicle. We believe that the City of Seattle and the Central Puget Sound region will be more vital and more successful if we do not build a new highway along Seattle's central waterfront.

A no-highway alternative – one that improves existing resources in the larger transportation system, and spreads traffic out – is a simpler and more efficient approach. It would offer the mobility we need at a cost we can afford, without a decade of disruption to businesses and residents, and the billion-dollar liabilities of a megaproject. We should not give up our city's most valuable ecological, civic, and economic land for just a highway. We have a once-in-a-century chance to do better, and we owe it to ourselves and our children to be rethink the way we provide stewardship to Seattle's waterfront.

Therefore, we urge you to:

- include a "no-highway" alternative in a supplemental EIS
- separate the seawall project out and pursue its completion with appropriate urgency.

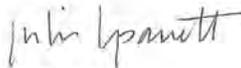
Sincerely,



Cary Moon
Founders, People's Waterfront Coalition



Grant Cogswell



Julie Parrett

Cc: Hon. Gary Locke, Governor, State of Washington
Hon. Greg Nickels, Mayor, City of Seattle
Seattle City Council
Hon. Ron Sims, Executive, King County
King County Council

551 1ST AVE. S. SEATTLE WA 98104 TEL 206-624-1061 WWW.PEOPLESWATERFRONT.ORG

C-021-006

Building a temporary structure on the waterfront during construction is no longer being considered.

C-021-007

For the preferred Bored Tunnel Alternative, the north portal is located at Thomas Street, well north of the Pike Place Market. See the Final EIS for the current alignments of the proposed build alternatives.

C-021-008

The south portal for the preferred alternative would be located near S. Dearborn Street. The south portal would not be expected to physically or visually separate Pioneer Square and the waterfront. Please see Final EIS Appendix E, Visual Simulations, which will show you how the alternatives could look.

C-021-009

The preferred Bored Tunnel Alternative would not have this aerial structure. Also, the design for the Cut-and-Cover Tunnel Alternative has been revised to remove this aerial structure. This alternative now proposes that between Lenora Street and the Battery Street Tunnel, SR 99 would travel in a new lowered roadway (retained cut) section with overpasses at Elliott and Western Avenues and at the Bell Street intersection.

C-021-010

The purpose of the project is to provide a replacement transportation facility. However, the Alaskan Way Viaduct Replacement Project has been coordinating with the City of Seattle's waterfront planning efforts to design the Alaskan Way surface street. For the Bored Tunnel Alternative, the City will lead planning and design of the central waterfront via the Central Waterfront Project.

C-021-011

The Surface Alternative has been eliminated from further consideration as explained in the 2010 Supplemental Draft EIS and the Final EIS because it does not meet the project's purpose and need to provide capacity to and through downtown Seattle. The project has evolved since 2004. Please see the Final EIS for current information about the proposed build alternatives.

C-021-012

The project and the proposed build alternatives have changed substantially since this comment letter was submitted in 2004. Please see the Final EIS for updated information. The preferred alternative, the Bored Tunnel, does not replace the seawall. The Cut-and-Cover Tunnel and Elevated Structure Alternatives do propose to replace the seawall. An updated description of these proposed improvements, their effects, and proposed mitigation is contained in the Final EIS.

C-021-013

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each

alternative and its construction plan, and Chapter 6 describes construction effects.

C-021-014

Many people asked the lead agencies to consider an alternative that would remove the viaduct and replace it with a four-lane surface roadway along Alaskan Way and include transit improvements. Without a host of improvements and modifications, a four-lane Alaskan Way would create even more congestion on I-5 and downtown streets than the alternatives evaluated in the Draft and Supplemental Draft EISs. Transportation studies performed for this project indicate that replacing the viaduct with a four-lane surface street would substantially increase congestion for most of the day and part of the evening on I-5 through downtown Seattle, downtown streets, and Alaskan Way. On downtown streets, traffic would increase by 30 percent; though traffic increases to specific areas like Pioneer Square and the waterfront could exceed 30 percent. With a four-lane roadway, traffic on Alaskan Way would quadruple to 35,000 to 56,000 vehicles per day compared to about 10,000 vehicles today. This traffic increase would make Alaskan Way the busiest street downtown, carrying more traffic than Mercer Street does today. The increased traffic congestion would also make travel times worse for buses, making transit improvements along these streets largely ineffective. Finally, neighborhoods west of I-5 (Ballard, Queen Anne, Magnolia, and West Seattle) would be less accessible and would face longer commute times.

Replacing the Elliott Bay Seawall would be a separate project if the Bored Tunnel Alternative is selected, because the failing seawall does not have the potential to affect the seismic stability of this alignment. For the other build alternatives (Cut-and-Cover Tunnel and Elevated Structure Alternatives) evaluated in the Final EIS, the seawall replacement is included in the project because its seismic instability threatens the seismic safety of the viaduct and its foundations. Replacing

the seawall for these alternatives will also provide a solid foundation for the design alternative. The seawall is necessary not only to the safety and stability of the viaduct structure but also to protect the waterfront resources and the economic resources and functions that line Seattle's waterfront, including the Port of Seattle's marine container terminal operations, the Seattle Ferry Terminal, and other marine dependent commercial interests.

Please see Chapter 3 in the Final EIS for a description of the current configuration for each alternative in the project area.

AWV Draft EIS Comment Form Results:

Name: Elizabeth Kanny
Address: 1950 Alaskan Way
City: Seattle
State: Wa
Zip Code: 98101
Email: elizabeth717@cablespeed.com
Affiliation (optional): Waterfront Landings Homeowner's Association

Would like to be added to the project mailing list?

Yes

Project Comments:

C-022-001

I am writing on behalf of the Owner's Association of Waterfront Landings, a community of approximately 300 residents who live directly on the waterfront. The waterfront is our home. We thank you for the opportunity to comment on the draft EIS. We think the EIS is deficient and/or does not adequately address the following issues: 1. We think that the alternative selected should be based on the shortest construction period and the EIS does not take this into account. 2. Alternatives that are not contingent on maintaining the current traffic flow during construction are not discussed adequately. The EIS seems to focus on only keeping traffic flowing - whether or not that impacts the length of construction time. 3. The EIS does not adequately address how traffic will be diverted or will flow through and around downtown during construction and in what volumes. 4. We would like to see shortened construction periods and minimized traffic detours during construction. This is not adequately discussed in the EIS. 5. The EIS does not address the economic impact in the construction corridor related to reduced property values, loss of businesses, lost tax revenues, reduced revenue from cruise ship patrons, etc. This is a major concern of ours not only from the perspective of reduced property values at Waterfront Landings, but also what impact this will have to vitality of the waterfront and it's businesses. 6. The EIS does not adequately address the displacement of existing parking spaces on and off street, bus staging areas, taxi stands, etc. Sincerely, Elizabeth Kanny President, Waterfront Landings Owner's Association

C-022-002

C-022-003

C-022-004

C-022-005

Comments apply to:
Overall Project

C-022-001

The lead agencies appreciate the community's interest in the project and their comments on the Draft EIS.

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

The total construction duration for the Bored Tunnel Alternative is 5.4 years. At the end of Traffic Stage 7, up to a 3-week closure would be needed to connect SR 99 to the bored tunnel.

The total construction duration for the Cut-and-Cover Tunnel Alternative is 8.75 years. The construction plan for the Cut-and-Cover Tunnel Alternative would close SR 99 to all traffic for 3.25 years (39 months) between S. Royal Brougham Way and Denny Way. The Alaskan Way surface street would also be closed to north-south traffic during construction.

The total construction duration for the Elevated Structure Alternative is 10.0 years. The Elevated Structure Alternative's construction plan would completely close SR 99 to all traffic for 2 to 4 months in Traffic Stage 4 and for 3 months in Traffic Stage 7. SR 99 will be restricted to two lanes in each direction throughout the construction period. The Alaskan Way surface street would maintain one lane in each direction by transitioning temporary detour alignments along the corridor as needed.

C-022-002

The duration and magnitude of construction-related traffic impacts is more thoroughly discussed in the Transportation Discipline Report, Appendix C of the Final EIS, and it provides a general discussion of how traffic will be diverted with each of the project alternatives. This evaluation further defines and identifies traffic impacts on surface streets, in terms of potential traffic volumes and congestion levels, within the downtown core and in neighboring areas such as Pioneer Square, Belltown, and the Stadium district (among others).

C-022-003

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and

Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

C-022-004

See Appendix L, Economics Discipline Report, of the Final EIS for the current analysis of economic effects during project construction for each proposed build alternative.

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

C-022-005

The project, proposed build alternatives, and effects have changed substantially since this comment was received. Please see the Final EIS for updated information.

1425 Western Avenue
Hillclimb Court
Seattle, WA 98101
May 28, 2004

Ms. Allison Ray
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

SR 99 - Alaskan Way Viaduct and Seawall Replacement Project
Draft Environmental Impact Statement Comment

Hillclimb Court is located at 1425 Western Avenue and is directly adjacent to the Viaduct project site. Our condominium complex has 37 residential units and 3 retail units.

Our collective concerns for the Alaskan Way Viaduct project, regardless of the alternative chosen, are as follows:

1: Construction Impacts

C-023-001

A. Establish a forum for residences and businesses adjacent to the project site to work with the design team to assure that the concerns about construction impacts are met.

C-023-002

B. Noise: Limit construction noise that exceeds the City of Seattle residential nighttime noise regulations to non-residential areas of the project site. Appendix F states that City noise levels are expected to be exceeded in the nighttime and this is not acceptable in a residential area.

C-023-003

C. Traffic: We are concerned about increased traffic on Western Avenue caused by any detours to SR 99. Southbound traffic should be diverted before reaching the Pike Place Market area, perhaps at Broad or Denny Way, thereby preventing additional congestion in the vicinity of Pike Place Market.

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C-023-001

The lead agencies use several communication and public involvement tools (outlined in Appendix A, Public Involvement Discipline Report, of the Final EIS) to gather input and help shape the project throughout design and construction. There are opportunities to attend public meetings and community events to learn more about the project and multiple ways to contact the project team with any questions or concerns including a hotline (1-888-AWV-LINE) or e-mail (viaduct@wsdot.wa.gov).

In addition, many forums are in place to provide feedback to the project team:

- North and south portal working groups have been meeting since May 2009, and they do not have a firm end date.
- Maintenance of traffic meeting in the south end discusses upcoming construction and potential traffic impacts. This includes stakeholders as well as the contractor and staff from the project office.
- Construction outreach tools, such as distributing (often in person) notices to adjacent businesses and residents about upcoming work, regular construction reports on the website, and e-mail updates.
- Other resources: 24-hour hotline, the website, viaduct e-mail for comments or questions, community briefings, information booths, and community events.

Many of these tools are used as opportunities to have dialogue or discuss any issues with stakeholders or neighbors.

C-023-002

Construction of the project will require nighttime construction activities, and the City requires a Major Public Project Noise Variance. Construction noise mitigation requirements would be developed and specified in the noise variance. The Major Public Project Noise Variance

- C-023-004** | D. Develop a clear process by which claims for any damage to adjacent properties can be made and fully compensated. Full disclosures of project insurance levels or self insurance of WSDOT should be made.
- C-023-005** | E. Phase construction adjacent to Hillclimb Court to maintain parking garage exit access onto Alaskan Way. Integrate safe access into final design.
- C-023-006** | F. Provide adequate dust control during demolition.

2: Community Impacts

- C-023-007** | **Develop programs to keep area businesses alive during the project period. Having people continue to access the area shops and restaurants will enhance the safety of the adjacent neighborhoods.** Consider mitigating impacts to neighborhood business with a public information campaign.

3: Design Alternative Impact

- C-023-008** | Locate Pike Street Ventilation Building and its stacks someplace other than the Pike Place Market Hillclimb residential area. The EIS needs to address the release of concentrated pollutants and their effect on a residential property directly adjacent to the proposed ventilation stack. What are the effects of constant exposure to the plume from the ventilation building? What type of particulate matter will be released and what are the health risks? Ross Manor and Heritage House are neighborhood homes for the elderly, and many children play in the Hillclimb Court courtyard and in Pike Place Market Daycare. They should not be exposed

will be presented for public comment. Mitigation measures are described in Chapter 8 of the Final EIS and Appendix F, Noise Discipline Report.

C-023-003

Transportation planning for the construction period is ongoing, but analysis of the various detour proposals indicates that generally the largest traffic increases on Western Avenue are forecasted to occur north and/or south of the Pike Place market area. The project team is aware of the sensitivity of the market area to increased traffic.

C-023-004

WSDOT is currently preparing a claims process that would address any damage to property directly related to the preferred Bored Tunnel Alternative. This information will be given to individual property owners that may be affected by the project.

WSDOT plans to install an array of monitoring equipment to alert the construction team of any settlement which would be used in the claims process.

If another alternative is selected, a claims process would be developed specifically for that alternative.

C-023-005

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery

1425 Western Avenue
Hillclimb Court
SR 99 – Alaskan Way Viaduct and Seawall Replacement Project Draft EIS
Comment
May 28, 2004
Page 3

C-023-008

to concentrated airborne pollutant levels with the greater associated health risks that would result from the ventilation stacks. The EIS should also address the change in character of the ambient noise resulting from the frequency and steady sound of the fans. These concerns should affect a location for the building to a non-residential area. There are many options further south of the currently proposed location so it is not located next door to people's homes.

Thank you for your consideration of these matters.

Sincerely,



Marco Zangari, President Hillclimb Court Homeowners' Association

Board of Directors:

Michele Hasson
Kenneth Rupard
Steve Emmer
Daniel Klein
Michael Roberts
Linda Priezler
Cindy Hirsch
Bonnie Collett

companies, the Port of Seattle, neighborhood groups, and other affected groups.

C-023-006

The Final EIS and Appendix M, Air Quality Discipline Report, discuss mitigation measures during construction. A Memorandum of Agreement between WSDOT and PSCAA is in place to help eliminate, confine, or reduce construction-related emissions for WSDOT projects. WSDOT will create a plan for controlling fugitive dust during construction. This fugitive dust control plan would reduce air pollutant emissions near the construction site, including near residences located along Battery Street adjacent to the open grates.

C-023-007

As mentioned above, the lead agencies plan to maintain access to businesses during construction. Economic mitigation measures for non-access types of impacts to businesses during construction are discussed in Chapter 8 of the Final EIS.

C-023-008

An exhaust stack near Pike Place Market is no longer included in any of the alternatives. The preferred Bored Tunnel Alternative would have two tunnel operations buildings that include exhaust stacks. One building would be located in the south portal area near Alaskan Way S. and Railroad Way S., and a second building would be located in the north portal area near Sixth Avenue and Harrison Street.

RECEIVED

MAY 13 2004

AWVSP Team Office

May 11, 2004

Allison Ray
AWV Project Office
Wells Fargo Building
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Ray:

This letter sets out the comments to date by the Queen Anne Community Council on the Alaskan Way Viaduct and Seawall Replacement Project DEIS.

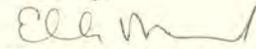
The economic future of the Queen Anne neighborhoods and adjacent neighborhoods are directly affected by the choice of preferred alternative for the AWVSR.

We believe that the preferred alternative must provide:

- Continued traffic mobility
- Excellent urban design
- Improved economic health and improved tax base for Seattle.

Most important to our neighborhood: The preferred alternative must retain or improve the present capacity for passenger and freight vehicles in both directions of SR99 in the AWVSR segments. The new north portal access to Elliott and Western Avenues must retain their present capacity.

Sincerely,



Ellen Monrad, President

cc: Representatives Helen Sommers,
Jeanne Kohl-Welles, Nancy Dickerson

President

Ellen Monrad

Board

Elizabeth Anderson

Scott Baker

Jason Bennett

Grag Bjarko

Sheila Callahan

Amy Carlson

John Coney

Denise Derr

Karen Ann Freeman

Craig Hanway

Don Harper

John Hoffman

Marty Kaplan

Jeff Kass

Sharon LeVine

Ron Mason

Margaret Okamoto

Allen Panitch

Jeff Parker

Kirk Robbins

Matt Roewe

Jack Soldati

Jim Smith

Mike Warren

C-024-001

C-024-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. Several elements you mention are part of the purpose and need of the project. The preferred Bored Tunnel Alternative will improve safety and provide sufficient capacity to efficiently move people and goods to and through downtown Seattle. Because the project has evolved since 2004, please refer to the Final EIS for updated information. The preferred Bored Tunnel Alternative would remove the Elliott and Western ramps. The connection between Alaskan Way and Elliott and Western Avenues would be constructed as a separate project led by the City of Seattle. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would include ramps between SR 99 and Elliott and Western Avenues.



April 27, 2004

According to the environmental impact statement, the people who live near the viaduct are disproportionately poor and Latino. They will be the ones most impacted by the reconstruction and they are the ones who historically have had the weakest voice. Thank you very much for the outreach that the DOT and SeaTrans has done so far to take into account the impact on this community.

Because of this outreach, we are here to represent the over 1000 Latino day laborers who look for work on an annual basis through CASA Latino who will be adversely impacted by the viaduct reconstruction process. In all of the five alternatives, the CASA Latina Day Workers' Center will be displaced and the livelihood of these 1000 day laborers will be affected.

The CASA Latina day laborers understand that they need to move for the good of the community. They ask that their displacement be mitigated in the following two ways.

- 1) That the DOT give priority to construction companies that include in their bids a commitment to working with CASA Latina to employ our workers in the construction.
- 2) That the City of Seattle work with DOT to relocate the CASA Latina Day Workers' Center to a suitable location. The workers and the board of CASA Latina have determined that near Home Depot in the SoDo neighborhood would be an ideal relocation site but we need both political and economic assistance to be able to move there. We are asking that you give us this support.

Hilary Stern
Executive Director

220 Blanchard Street • Seattle, WA 98121 • tel. 206.956.0779 fax 206.956.0780 •
www.casa-latina.org

C-025-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

WSDOT will comply with the federal requirements for disadvantaged business enterprise (DBE) participation. WSDOT cannot require contractors to hire workers from specific organizations. However, WSDOT can and does encourage contractors to work with local organizations and to develop programs that draw on the local labor pool.

C-025-001

-----Original Message-----

From: Alaskan Way Viaduct Web Site [mailto:viaduct@wsdot.wa.gov]
Sent: Wednesday, April 28, 2004 1:36 PM
Cc: awvmail@enviroissues.com
Subject: AWV Draft EIS Comment Form

AWV Draft EIS Comment Form Results:

Name: Bryon S. Peterson
Address: 500 Union St. Suite 530
City: Seattle
State: wa
Zip Code: 98101
Email: bryon.peterson@hrgroupintl.com
Affiliation (optional): On behalf of Casa Latina

Would like to be added to the project mailing list?

Yes

Project Comments:

As a volunteer Board of Director's member I would like to express my following opinion: It is imperative to me that the Viaduct Committee assist the Casa Latina organization with employment opportunities for this group of displaced workers by employing them in the construction of the viaduct project. Secondly, we are in desperate need of financial support for the relocation of this group of people to a location that is convenient to contractors. Your assistance is truly necessary Sincerely, Bryon S. Peterson, President, HR Group International

Comments apply to:

Other Topic: Relocation of Casa Latina Day Workers

C-026-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

WSDOT will comply with the federal requirements for disadvantaged business enterprise (DBE) participation. WSDOT cannot require contractors to hire workers from specific organizations. However, WSDOT can and does encourage contractors to work with local organizations and to develop programs that draw on the local labor pool.

C-026-001

**Alaskan Way Viaduct and Seawall Replacement Project Draft EIS
Comment Form**

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Contact Information

At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Check here if you would like to be added to the project Mailing list.

Name Bryan S Peterson
 Address 500 Union St, Suite 530
 City Seattle State WA Zip 98101
 Email bryan.peterson@hrgroupintl.com
 Organization/Membership Affiliations Casa Latina Board member
(optional)

Choose a topic

- | | | |
|---|---|--|
| <input type="checkbox"/> Overall Project | <input type="checkbox"/> Alternative Tunnel Alternative | <input type="checkbox"/> Seawall |
| <input type="checkbox"/> All of the Alternatives | <input type="checkbox"/> Bypass Tunnel Alternative | <input type="checkbox"/> Construction Impacts & Mitigation |
| <input type="checkbox"/> Rebuild Alternative Aerial | <input type="checkbox"/> Surface Alternative | <input type="checkbox"/> Other _____ |

What are your comments about the Project?

C-027-001

Casa Latina has a workers/laborers program and is located on Western Ave. Due to the viaduct program/reconstruction we are obligated to relocate the workers center. Your assistance is critical to continuation of this nonprofit organization.

C-027-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

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Contact Information

At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Check here if you would like to be added to the project Mailing list.

Name Mike Larson
 Address 600 University St., Suite 1730
 City Seattle State WA Zip 98101
 Email MLARSON@L-H-S.COM
 Organization/Membership Affiliations (optional) CASA LATINA Board

Choose a topic

- Overall Project Alternative Tunnel Alternative Seawall
 All of the Alternatives Bypass Tunnel Alternative Construction Impacts & Mitigation
 Rebuild Alternative Aerial Surface Alternative Other _____

C-028-001

What are your comments about the Project?

CASA LATINA'S work dispatch center will be displaced by this project resulting in a loss of many jobs. I think contractors on the project should be granted preference if they hire CASA LATINA workers. Assistance for relocation of the dispatch center to within walking distance of free ride zone should also be required.

C-028-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

WSDOT will comply with the federal requirements for disadvantaged business enterprise (DBE) participation. WSDOT cannot require contractors to hire workers from specific organizations. However, WSDOT can and does encourage contractors to work with local organizations and to develop programs that draw on the local labor pool.

Name BRIAN ABEEL
 Address 1536 S. SHELTON ST
 City SEATTLE State WA zip 98108
 Email brianabeel@cablespeed.com
 Organization/Membership Affiliations CASA LATINA (BOARD MEMBER)
(optional)

Choose a topic

- Overall Project Alternative Tunnel Alternative Seawall
 All of the Alternatives Bypass Tunnel Alternative Construction Impacts & Mitigation
 Rebuild Alternative Aerial Surface Alternative Other _____

C-029-001 What are your comments about the Project?

PLEASE ASSIST CASA LATINA IN RELOCATION OF DAY WORKERS CENTER. THIS SUPPORT SHOULD BE BOTH FINANCIAL AND POLITICAL. PLEASE ALSO GIVE PRIORITY TO CONTRACTORS WHO AGREE TO HIRE CASA LATINA WORKERS.

C-029-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

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Contact Information

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Check here if you would like to be added to the project Mailing list.

Name Lori Rathy, Attorney
Riddell Williams
 Address 1001 4th Ave, Ste 4500
 City Seattle State WA Zip 98154
 Email lrathelriddellwilliams.com

Organization/Membership Affiliations (optional) CABA Latina Board Member

Choose a topic

- Overall Project
- Alternative Tunnel Alternative
- Seawall
- All of the Alternatives
- Bypass Tunnel Alternative
- Construction Impacts & Mitigation
- Rebuild Alternative Aerial
- Surface Alternative
- Other _____

What are your comments about the Project?

C-030-001 The project will displace the CABA Latina Day Workers Center, which provides important ~~employment~~ employment & leadership opportunities to Latino immigrants. We ask that the City provide its support as we seek to relocate to a new site near ~~the~~ the free Metro bus zone and with good freeway access. We also ask that the City contract only with

The lead agencies are trying a new question and answer format for this Draft EIS. Your answers to the questions below will let the agencies know if the new format was helpful. Your answers

to these questions are not part of the EIS process and they will not receive a response.

1. Is this the first EIS you have read?
 Yes No
2. Have you previously participated in public meetings/comment periods related to transportation projects?
 Yes No
3. Did you find this Draft EIS format easy to understand?
 Yes No
 Why or why not?
4. Did the graphics help make the Draft EIS easier to review and understand?
 Yes No
5. What did or didn't you find helpful when reading this Draft EIS?

companies that agree to work with CABA Latina workers. Thank you

C-030-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

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Contact Information

At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Check here if you would like to be added to the project Mailing list.

Name JOHN DeRocco
 Address 5633 S. WILLOW
 City SEA. State WA Zip 98118
 Email JD
 Organization/Membership Affiliations (optional) CASA LATINA BOARD OF DIRECTORS

Choose a topic

- Overall Project Alternative Tunnel Alternative Seawall
 All of the Alternatives Bypass Tunnel Alternative Construction Impacts & Mitigation
 Rebuild Alternative Aerial Surface Alternative Other _____

What are your comments about the Project?

C-031-001

SINCE THIS PROJECT WILL BE DISPLACING THE CURRENT "CASA LATINA" DAY WORKING CENTER I WOULD LIKE TO SEE HELP PROVIDED TO FIND A NEW LOCATION FOR CASA. ALSO WOULD LIKE TO SEE THE CONSTRUCTION CO. INVOLVED IN THIS PROJECT TO GIVE PREFERENCE TO CASA WORKERS

C-031-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

WSDOT will comply with the federal requirements for disadvantaged business enterprise (DBE) participation. WSDOT cannot require contractors to hire workers from specific organizations. However, WSDOT can and does encourage contractors to work with local organizations and to develop programs that draw on the local labor pool.

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Contact Information

At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Check here if you would like to be added to the project Mailing list.

Name Leticia Lopez
 Address 1536 S Shelton St.
 City Seattle State WA Zip 98105
 Email lopez@serv.net
 Organization/Membership Affiliations (optional) CASA Latina Board Member

Choose a topic

- Overall Project Alternative Tunnel Alternative Seawall
 All of the Alternatives Bypass Tunnel Alternative Construction Impacts & Mitigation
 Rebuild Alternative Aerial Surface Alternative Other _____

What are your comments about the Project?

I would like to share my concerns about the displacement of casa latina day laborers in the Belltown area and strongly urge this project to consider their long-time home & as well as how to relocate this center near the tree-ride zone as well as near freeway access which is critical to the economic survival of this community. Additionally - please

The lead agencies are trying a new question and answer format for this Draft EIS. Your answers to the questions below will let the agencies know if the new format was helpful. Your answers

1. Is this the first EIS you have read?
 Yes No
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 Yes No
3. Did you find this Draft EIS format easy to understand?
 Yes No
 Why or Why not?

to these questions are not part of the EIS process and they will not receive a response.

4. Did the graphics help make the Draft EIS easier to review and understand?
 Yes No
5. What did or didn't you find helpful when reading this Draft EIS?

*establish a system that supports prioritizing those contractors willing to utilize the labor of these same soon-to-be displaced workers
 Thank you Leticia*

C-032-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

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C-032-001

AWV Draft EIS Comment Form Results:

Name: Matias Valenzuela
Address: 610 28th Ave East
City: Seattle
State: WA
Zip Code: 98112
Email: matiasv@u.washington.edu
Affiliation (optional): CASA Latina

Would like to be added to the project mailing list?

Yes

Project Comments:

C-033-001

As a board member of CASA Latina since 1997 and a Seattle resident, my main concerns are with the impact that this project will have on the Day Worker Center in the Belltown neighborhood run by CASA Latina. I would like to see two things: (1) Assistance in relocating the Day Worker Center to a site in the free bus zone or the Sodo neighborhood. Day workers have been coming to the area where the Day Worker Center is for decades, and considerations for them and their employers should be taken into account. Given that many workers are low income and often live in the downtown shelters, a new site in the free bus zone is ideal. (2) Serious consideration of the laborers in the Day Worker Center for projects and contracts associated with the building of the new Viaduct project.

Comments apply to:
Construction Impacts and Mitigation

C-033-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

WSDOT will comply with the federal requirements for disadvantaged business enterprise (DBE) participation. WSDOT cannot require contractors to hire workers from specific organizations. However, WSDOT can and does encourage contractors to work with local organizations and to develop programs that draw on the local labor pool.

Ray, Allison

From: ILWU Local 19 [ilwulocal19@qwest.net]
Sent: Wednesday, May 26, 2004 2:55 PM
To: RayAlli@wsdot.wa.gov

TO: ALLISON RAY, WSDOT ENVIRONMENTAL COORDINATOR
<http://www.wsdot.wa.gov/projects/viaduct>

FROM: HERALD UGLES, ILWU LOCAL #19

DATE: MAY 25, 2004

ILWU Local #19 would like to comment on the DEIS for the Alaskan Way Viaduct.

C-034-001 We feel first and foremost that the most important thing to consider is to keep the present access level to container Terminal #46 during and after construction.

Terminal #46 is one of the main three (3) terminals in the Port of Seattle that drives the economic engine of the state and of the nation.

Whichever alternative is picked, Terminal #46 must remain a viable working container terminal. It would be ideal if on the south end, E. Marginal Way could be moved to the East and Terminals 25 & 30 could be fully utilized as container terminals, and have direct access to the S.I.G. intermodal yard.

The ILWU feels that the WSDOT, FHWA and SDOT have a great opportunity to keep the Port of Seattle a gateway to the world.

The Pacific Maritime Association estimates cargo will double through the West Coast by 2015, and the Port of Seattle is in position to prosper if we plan for the future.

6/22/2004

C-034-001

The lead agencies have coordinated extensively with the Port of Seattle throughout the alternative development process. The Port of Seattle has included Terminal 46 in their list of Port properties where access and function must be protected as a key container terminal facility. The lead agencies recognize the need to maintain access to the railyards and all rail operations as well as the regional highway system.

As design and construction sequencing proceeds, the lead agencies will work closely with the Port of Seattle to identify any necessary staging areas, negotiate any needed construction easements, and minimize impacts to Port facilities.

Ray, Allison

Subject: BOMA Board of Trustees

- C-035-001** BOMA DEIS VIADUCT COMMENTS June 1, 2004 We appreciate the wealth of information available for consideration of the Viaduct alternatives and the outreach provided by the AWV project. The BOMA Board of Trustees has a keen interest in this project both in the context of the regional economy and also in the context of continuing the work of a vibrant Seattle downtown environment. The Board recognizes that it is important to consider the project in a long term context and therefore believes that the Six-Lane Tunnel alternative provides the greatest benefit for the future of downtown and the region. Capacity: Do not diminish the existing capacity of 110,000 vehicles per day. We believe that the six-lane tunnel provide adequate capacity in the future along with the other projects that will provide alternative methods of transportation. Freight Mobility: Ensure that freight mobility through the corridor is maintained and enhanced. Additional studies need to be done to determine that hazardous materials can be safely transported from the Ballard industrial areas to the Port and railroad yards in south Downtown, including capacity needed, tunnel constraints and alternative routes.
- C-035-002**
- C-035-003** Economic Development: Both during the construction phase and the long term development of the waterfront consistent vigilance must be maintained to ensure that the economic vitality of downtown is maintained and enhanced for the future. We ask for a more detailed plan for business mitigation during the construction phase; consideration of the trade-offs of expediting the construction phase with fewer access lanes vs. the negative economic impact of a long construction phase; and a final design that will enhance the future development of the waterfront and the adjoining neighborhoods. Thank you for the opportunity to comment.

C-035-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

C-035-002

Transporting flammable or hazardous materials would be prohibited in the bored tunnel all day. Operators hauling these types of materials would need to use I-5 or Alaskan Way.

The lead agencies are committed to working with the freight community to define alternative routes and appropriate mitigation during the construction period.

C-035-003

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed

for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

The construction sequences and durations proposed in the Final EIS have considered the duration of construction and resulting impacts along with available funding and the need to maintain access.

Economic mitigation strategies for non-access types of impacts to businesses during construction are presented in Chapter 8 of the Final EIS.

With the preferred Bored Tunnel Alternative, the City of Seattle will lead the waterfront development effort with the Central Waterfront Project.

Alaskan Way Viaduct and Seawall Replacement Project

CommentID: 4632 Form 259 CommentDate 4/27/2004
 Abby Rubinson Organization: Pioneer Square
 Address: 119 1st Avenue City: Seattle State: WA Zip: 98014

1. Choose Topic:

Overall	Tunnel	Construction Impacts and
All of the	Bypass Tunnel	Other
Rebuild	Surface	
Aerial	Seawall	

Comment:

C-036-001

Alternatives: Given the visual benefits of the surface, bypass tunnel, or tunnel alternatives, one of these alternatives is the most logical choice. Property values will soar, which will spur residential density in downtown (furthering one of the City's current objectives) and will also attract visitors, shoppers, and tourists to the waterfront and the vicinity. Neighboring areas, e.g. Pioneer Square, West Edge, Belltown, stand to benefit greatly from the removal of an aerial structure, as these areas will enjoy connections to the waterfront. Though the short-term costs may be significant, the long-term gains far outweigh these costs.

C-036-002

Construction Impacts and Mitigation:
 Parking -- Throughout the Draft EIS, the loss of parking -- both short- and long-term -- is repeatedly cited as an impact, particularly in Pioneer Square. Mitigation, therefore, should address this loss of parking. The proposed strategies of maximizing utilization of existing facilities, leasing a facility, or buying/building a facility seem reasonable, but given the large number of spaces needing to be replaced, it is likely that a new facility will need to be built. The Pioneer Square community (via the Pioneer Square Community Association) looks forward to working with the AWWSR team to establish appropriate mitigation.

C-036-003

Congestion/Economic Impacts -- Increased traffic congestion also appears frequently in the DEIS. Impacts to businesses, especially small businesses like those in Pioneer Square, will be overwhelmingly negative due to severe impediments to accessing businesses and a resulting projected decrease in sales. Because the project area extends 400 feet from the existing viaduct, the number of businesses to be affected is considerable. (I believe the DEIS identified 1100 businesses within 1 block.) Among mitigation measures, both access to and marketing for these businesses will be essential. With such a lengthy overall construction period (despite the several-month rest periods), many businesses, especially the small, independent ones, will face serious challenges in enduring the years coinciding with construction. Economic development assistance -- including effective traffic detours and visible marketing -- will be necessary for their continued existence, and the Pioneer Square community encourages you to work with us to establish reasonable mitigation for these businesses.

C-036-004

Historic Structures -- In light of the damage that vibration impacts can cause to historic buildings, careful attention must be paid to construction near those buildings. Whenever possible, construction methods that pose the smallest threat to compromising the structural integrity of those buildings should be selected.

C-036-005

Finally, the relocation of the Washington Street Boat Landing is a necessary byproduct of the AWWSR project. Along with this structure's relocation, improvements to the area, e.g. sidewalk improvements should accompany this project so that the area is left in comparable if not better condition than its current state.

Thank you for soliciting public input and for taking the time to review these comments. The Pioneer Square Community Association looks forward to working with you throughout this process.

C-036-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Both the Bypass Tunnel and the Surface Alternative have been eliminated from further consideration. The project has evolved since the publication of the Draft EIS in 2004. Please see the Final EIS for current information about the proposed build alternatives for this project.

C-036-002

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system

- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide frequent parking updates
- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

C-036-003

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

C-036-004

A Programmatic Agreement is required by the State Historic Preservation Office. This agreement is signed by the three lead agencies (City of Seattle, WSDOT, and FHWA), along with the State's Office of Architecture and Historic Preservation. The Programmatic Agreement identifies the responsible parties for compliance with the mitigation measures set forth in the Agreement. This means that the City and the

State are reviewing the construction process to ensure that no damage to historic buildings occurs.

The City of Seattle will likely require monitoring of construction near the City's historic buildings and areaways to ensure that vibration or other potential construction impacts are not causing deleterious effects to these structures. Other potential mitigation measures are listed and described in the Final EIS and in Appendix I, Historic, Cultural, and Archaeological Resources Discipline Report.

C-036-005

The preferred Bored Tunnel Alternative would not affect the Washington Street Boat Landing and would not alter the configuration of Alaskan Way. Under this alternative, the waterfront planning process would be led by the City of Seattle under the Central Waterfront Project. The Central Waterfront Project would address any improvements to the waterfront as mentioned in this comment.

The Cut-and-Cover Tunnel Alternative would have a pedestrian and bike trail on the west side, called the Port Side Pedestrian/Bike Trail, and a minimum 25-foot-wide multi-use path, called the City Side Trail, on the east side.

The Elevated Structure Alternative would provide a shared use path for pedestrians and bicyclists starting at S. King Street. This path would transition from the west side of the ferry queuing lanes to the west side of the surface street, where the bicyclists and pedestrians would be separated. Pedestrians would use a 9-foot-wide sidewalk next to Alaskan Way, and bicyclists would use a 10-foot-wide path along the west side of the sidewalk. From S. Washington Street north, a 20-foot-wide promenade would run between the west side of the bicycle lane and the waterfront, and the bike lane would widen to 12 feet. On the east side of the surface street, the sidewalk would widen into a combined

sidewalk/landscape area ranging in width from 34 to 50 feet. North of S. Jackson Street, the outside street lanes would widen to about 14 feet to accommodate bicycle traffic.



Alaskan Way Viaduct and Seawall Replacement Project

Draft EIS Comment Form

Please use this form to give us comments on the Draft Environmental Impact Statement (Draft EIS) for the Alaskan Way Viaduct and Seawall Replacement Project. The comments you make will become part of the public record for this project. Your thoughts will help decision makers develop a preferred alternative. Responses to your comments will be provided in the Final EIS.

Contact Information: At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Name: Glen Scheiber
Organization/Membership Affiliation (optional): Pioneer Square
Address: 810 3rd Ave, Suite 615
City: Seattle State: WA Zip: 98104
E-mail: GScheiber@GBSRE.com

Check here if you would like to be added to the project mailing list.

1. Choose a topic:

- Overall Project
- Tunnel Alternative
- Construction Impacts and Mitigation
- All of the Alternatives
- Bypass Tunnel Alternative
- Other
- Rebuild Alternative
- Surface Alternative
- Aerial Alternative
- Seawall

What are your comments about the project?

C-037-001

① Great! ② Pioneer Square will be significantly impacted by the loss of parking and reduction of circulation. Solution: Open up Occidental Corridor for limited traffic also consider permanent use of north lot for community parking. Develop above and retail around the parking structure. Project may finance itself. (North portion of North lot) ^{housing}

(Please use additional paper if you need further comment space)

C-037-001

It is recognized that businesses and residents in Pioneer Square rely on the short-term and long-term parking in the area. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement are described in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report.

Occidental Avenue between S. Washington Street and S. Main Street is currently closed to traffic and used as part of Occidental Park. While this portion of Occidental Avenue is still designated as a street by the City of Seattle, it is unlikely that the City will restore the street for through traffic.

AWV Draft EIS Comment Form Results:

Name: gregory hill
Address: 1215 n
City: Sea
State: Wa
Zip Code: 98103
Email: grhill@streetarchitects.com
Affiliation (optional): Wallingford Community Council

Would like to be added to the project mailing list?

Yes

Project Comments:

C-038-001

The project is too ambitious and too expensive. It appears to place expansion as the overriding goal. Intermediate access points have proven to decrease capacity and safety and should be eliminated. Two alternatives not studied should be considered given the lack of financing: 1. The No-highway alternative which would eliminate the central portion of the project and substitute other smaller components including enhanced transit service on monorail and LINK and new expanded streetcar service. 2. Removing the top deck; adding new columns just outboard of the existing columns; widening the remaining (current lower deck) to a four lane facility with center barrier (total of 72 feet overall) [2'wall+8'brkdn+2x11'lanes+2'shldr+2'barrier]x2 These would be through lanes with no access from Battery to Jackson. Make Alaska a boulevard by shifting NB Alaska to under the viaduct; double streetcar track; bike lanes; shift trail to water side; on-street parking on both sides. The elevated would be the bi-pass. Local access from Alaska. Monorail serving local Ballard and W Seattle to downtown. Link serving mid-regional N Seattle and Airport/Burien to downtown. Add \$ to both rail systems for additional track to make additional connections such as the airport and Northgate. This project needs to have an affordable option that does not destroy the waterfront. These proposed options place increased dependence on new rail system, which is funded, for intermediate trips.

C-038-002

Comments apply to:
Overall Project
Construction Impacts and Mitigation
All of the Alternatives
Seawall

C-038-001

Many people asked the lead agencies to consider an alternative that would remove the viaduct and replace it with a four-lane surface roadway along Alaskan Way and include transit improvements. Without a host of improvements and modifications, a four-lane Alaskan Way would create even more congestion on I-5 and downtown streets than the alternatives evaluated in the Draft and Supplemental Draft EISs. Transportation studies performed for this project indicate that replacing the viaduct with a four-lane surface street would substantially increase congestion for most of the day and part of the evening on I-5 through downtown Seattle, downtown streets, and Alaskan Way. On downtown streets, traffic would increase by 30 percent; though traffic increases to specific areas like Pioneer Square and the waterfront could exceed 30 percent. With a four-lane roadway, traffic on Alaskan Way would quadruple to 35,000 to 56,000 vehicles per day compared to about 10,000 vehicles today. This traffic increase would make Alaskan Way the busiest street downtown, carrying more traffic than Mercer Street does today. The increased traffic congestion would also make travel times worse for buses, making transit improvements along these streets largely ineffective. Finally, neighborhoods west of I-5 (Ballard, Queen Anne, Magnolia, and West Seattle) would be less accessible and would face longer commute times.

C-038-002

Many of these options were looked at during the initial phases of the project's screening process. The screening process involved early analysis by the project team and discussions with community groups at more than 140 community meetings and community interviews, including businesses along the corridor. A total of 76 initial viaduct replacement concepts and seven seawall concepts were considered, and concepts that were not feasible, or were outside the purpose of the project, were dropped from further consideration. The most workable ideas were shaped into the five alternatives analyzed in the 2004 Draft EIS. These

five alternatives included a range of viaduct repair and replacement designs with some elements of earlier concepts combined with other design structures as the engineering team looked at feasibility, cost, and other criteria. The project has evolved and the alternatives further refined since comments were submitted in 2004. Please refer to the Final EIS for current information.

The Alaskan Way Viaduct Replacement Project is unable to fund improvements to other transportation systems that are independent of this project, such as the rail system, Link light rail, Sound Transit, or the monorail, but the project has coordinated continuously with the other transportation agencies in the region.



Alaskan Way Viaduct and Seawall Replacement Project

Draft EIS Comment Form

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Contact Information: At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Name: Vlad Oustimovitch
Organization/Membership Affiliation (optional): President, Southwest District Council
Address: 4109 SW Orchard St.
City: Seattle State: WA Zip: 98136-1940
E-mail: vlad@vova.us

Check here if you would like to be added to the project mailing list. *(already on list)*

1. Choose a topic:

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Overall Project | <input type="checkbox"/> Tunnel Alternative | <input type="checkbox"/> Construction Impacts and Mitigation |
| <input type="checkbox"/> All of the Alternatives | <input type="checkbox"/> Bypass Tunnel Alternative | <input type="checkbox"/> Other |
| <input type="checkbox"/> Rebuild Alternative | <input type="checkbox"/> Surface Alternative | |
| <input type="checkbox"/> Aerial Alternative | <input type="checkbox"/> Seawall | |

What are your comments about the project?

C-039-001 West Seattle needs capacity of existing viaduct to be maintained, regardless of alternative.

C-039-002 Construction period/impact significant issue as well

C-039-003 Good opportunity for city to improve other waterfront deficiencies such as undersized ferry terminal.

(Please use additional paper if you need further comment space)

C-039-001

The purpose of the project includes providing a facility that has sufficient capacity to efficiently move people and goods to and through downtown Seattle. Since the project has evolved, please see the Final EIS for current project information.

C-039-002

Yes, there are substantial construction impacts relating both to the lengthy duration of the construction period, as well as construction-related impacts in terms of noise, vibration, business and economic, visual quality, utility relocation, and particularly, traffic and transportation services, locally and regionally.

Discussion of these impacts as well as potential construction mitigation can be found in the Final EIS and in each of the individual discipline reports, which are appendices to the Final EIS.

C-039-003

If the preferred Bored Tunnel Alternative is selected, the exact configuration and types of activities on the waterfront will be decided by the Central Waterfront Project led by the City of Seattle. There will be many opportunities for the public to participate in that master planning effort and to determine the future of their waterfront. Please note that the Seattle Ferry Terminal Project is a separate project led by the Washington State Ferries and will have its own environmental process. However, the Alaskan Way Viaduct Replacement Project has coordinated with this project as necessary.



Alaskan Way Viaduct and Seawall Replacement Project

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Contact Information: At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Name: DOUGLAS HOWE ^{PRESIDENT OF NATIONAL ASSOCIATION OF OFFICE AND INDUSTRIAL PROPERTIES (NAIOP)}
Organization/Membership Affiliation (optional): TOUCHSTONE CORPORATION
Address: 2025 FIRST AVENUE, SUITE 790
City: SEATTLE State: WA Zip: 98121
E-mail: dhowe@touchstonecorp.com

Check here if you would like to be added to the project mailing list.

I. Choose a topic:

- Overall Project
- Tunnel Alternative
- Construction Impacts and Mitigation
- All of the Alternatives
- Bypass Tunnel Alternative
- Other
- Rebuild Alternative
- Surface Alternative
- Aerial Alternative
- Seawall

What are your comments about the project?

- C-040-001** EXPLORE ALTERNATIVE TO CONSTRUCTING THE TEMPORARY BATTERY STREET FLYOVER AND 5 YEAR ELEVATED BYPASS ON ALASKAN WAY. DISPERSE
- C-040-002** TRAFFIC DURING INTERIM CONSTRUCTION PERIOD ALONG I-5 & CITY STREETS INCLUDING ALASKAN WAY -
- C-040-003** SAVE MONEY, ATTEMPT TO SHORTEN CONSTRUCTION TIME ON BATTERY STREET-TUNNEL COMPONENT.

(Please use additional paper if you need further comment space)

C-040-001

After the 2004 Draft EIS was issued, numerous comments were received relating to the visual impacts and other negative effects of the Battery Street Flyover Detour. As the design plans for the Cut-and-Cover Tunnel and the Elevated Structure Alternatives evolved, the Battery Street Flyover Detour was eliminated.

C-040-002

Traffic will be dispersed along city streets and I-5 depending on the alternative selected.

C-040-003

With the preferred Bored Tunnel Alternative, the Battery Street Tunnel would be decommissioned. With the Elevated Structure Alternative or Cut-and-Cover Tunnel Alternative, the Battery Street Tunnel would be upgraded with safety improvements. Please see the Final EIS for the current construction durations for each build alternative.

C-041-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

WSDOT will comply with the federal requirements for disadvantaged business enterprise (DBE) participation. WSDOT cannot require contractors to hire workers from specific organizations. However, WSDOT can and does encourage contractors to work with local organizations and to develop programs that draw on the local labor pool.

**Alaskan Way Viaduct and Seawall Replacement Project Draft EIS
Comment Form**

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Contact Information

At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Check here if you would like to be added to the project Mailing list.

Name Edgar A. Gallego
Address 728 12th Ave. Apt 309
City Seattle State WA Zip 98122
Email _____
Organization/Membership Affiliations (optional) CASA Latina, Hispanic Organization for Legal Advancement.

Choose a topic

- | | | |
|---|---|---|
| <input type="checkbox"/> Overall Project | <input type="checkbox"/> Alternative Tunnel Alternative | <input type="checkbox"/> Seawall |
| <input type="checkbox"/> All of the Alternatives | <input type="checkbox"/> Bypass Tunnel Alternative | <input checked="" type="checkbox"/> Construction Impacts & Mitigation |
| <input type="checkbox"/> Rebuild Alternative Aerial | <input type="checkbox"/> Surface Alternative | <input type="checkbox"/> Other _____ |

C-041-001 What are your comments about the Project? CASA Latina understands that it has to move for the benefit of the community. However, CASA Latina requests two mitigating alternatives to its displacement. First, we ask that the DOT give priority to construction companies that employ workers signed with CASA Latina. Secondly, we ask that DOT and the City of Seattle help CASA Latina find a suitable location to move to. Such assistance includes political & economical assistance. CASA Latina prefers to relocate near Home Depot in the SODO area.

C-042-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

WSDOT will comply with the federal requirements for disadvantaged business enterprise (DBE) participation. WSDOT cannot require contractors to hire workers from specific organizations. However, WSDOT can and does encourage contractors to work with local organizations and to develop programs that draw on the local labor pool.

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MAY 21 2004
AWWSP Team Office

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Contact Information

At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Check here if you would like to be added to the project Mailing list.

Name Aracel Hernandez
Address 16305 28th Ave NE
City Seattle, WA State WA zip 98155
Email araceli@casa-latina.org
Organization/Membership Affiliations _____
(optional)

Choose a topic

- Overall Project
- Alternative Tunnel Alternative
- Seawall
- All of the Alternatives
- Bypass Tunnel Alternative
- Construction Impacts & Mitigation
- Rebuild Alternative Aerial
- Surface Alternative
- Other _____

What are your comments about the Project?

C-042-001

CASA Latina Day Workers Center will be adversely impacted by the viaduct reconstruction process. They will need to move ~~to~~ I would like that DOT give priority to construction companies that included in their bids a commitment to working with CASA Latina to employ their workers in the construction. I like that the City of Seattle work with DOT to relocate the CASA Latina Day Workers Center to a suitable location. They have determined that near Home Depot in the SoDo neighborhood would be an ideal relocation site.



Alaskan Way Viaduct and Seawall Replacement Project

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Contact Information: At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Name: Gabriela Quintana
Organization/Membership Affiliation (optional): CASA Latina
Address: 1705 S. Stevens St. #302
City: Seattle State: WA Zip: 98144
E-mail: quintgab@earthlink.net

Check here if you would like to be added to the project mailing list.

I. Choose a topic:

- Overall Project
- Tunnel Alternative
- Construction Impacts and Mitigation
- All of the Alternatives
- Bypass Tunnel Alternative
- Other
- Rebuild Alternative
- Surface Alternative
- Aerial Alternative
- Seawall

What are your comments about the project?

C-043-001

I work closely with the participants of CASA Latina. Their Day Labor Center will be dislocated once this project gets started. In order to have the least impact on the lives of these working poor men and women we ask 2 things: 1) The city should provide assistance/financial as well as political to re-establish the day worker center in the downtown area, near the freeway or in the SODO area. This will provide continuity in employment + the economy of our city.

(Please use additional paper if you need further comment space)

C-043-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

WSDOT will comply with the federal requirements for disadvantaged business enterprise (DBE) participation. WSDOT cannot require contractors to hire workers from specific organizations. However, WSDOT can and does encourage contractors to work with local organizations and to develop programs that draw on the local labor pool.



Alaskan Way Viaduct and Seawall Replacement Project

Draft EIS Comment Form

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Contact Information: At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Name: _____

Organization/Membership Affiliation (optional): _____

Address: _____

City: _____ State: _____ Zip: _____

E-mail: _____

Check here if you would like to be added to the project mailing list.

1. Choose a topic:

- Overall Project
- Tunnel Alternative
- Construction Impacts and Mitigation
- All of the Alternatives
- Bypass Tunnel Alternative
- Other
- Rebuild Alternative
- Surface Alternative
- Aerial Alternative
- Seawall

What are your comments about the project?

C-043-001

2): Ensure the the contractor hired for this major project has a commitment to working with and hiring Latino day laborers.

(Please use additional paper if you need further comment space)

C-044-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

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**Alaskan Way Viaduct and Seawall Replacement Project Draft EIS
Comment Form**

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AWSP Team Office

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Contact Information

At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Check here if you would like to be added to the project Mailing list.

Name Norma B. Ramirez
Address 524 S Cloverdale st #107
City Seattle State Wa Zip 98108
Email lbrnmi@hotmail.com

Organization/Membership Affiliations (optional) _____

Choose a topic

- | | | |
|---|---|--|
| <input type="checkbox"/> Overall Project | <input type="checkbox"/> Alternative Tunnel Alternative | <input type="checkbox"/> Seawall |
| <input checked="" type="checkbox"/> All of the Alternatives | <input type="checkbox"/> Bypass Tunnel Alternative | <input type="checkbox"/> Construction Impacts & Mitigation |
| <input type="checkbox"/> Rebuild Alternative Aerial | <input type="checkbox"/> Surface Alternative | <input type="checkbox"/> Other _____ |

What are your comments about the Project?

That the DOT of Seattle work to construction companies that include in their bids a commitment to working with Casa latina to employ our workers in the construction.

C-044-001

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AWWSP Team Office

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Contact Information

At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Check here if you would like to be added to the project Mailing list.

Name Daniel Anguiano Moran
Address 1110 8th Ave Apt #203
City Seattle State Wa Zip 98111
Email _____

Organization/Membership Affiliations (optional) _____

Choose a topic

- Overall Project Alternative Tunnel Alternative Seawall
 All of the Alternatives Bypass Tunnel Alternative Construction Impacts & Mitigation
 Rebuild Alternative Aerial Surface Alternative Other _____

What are your comments about the Project?

That the City of Seattle work DOT to relocate Casa Latina Day workers' Center to a suitable location. We are asking that you give us this support.

The lead agencies are trying a new question and answer format for this Draft EIS. Your answers to the questions below will let the agencies know if the new format was helpful. Your answers

to these questions are not part of the EIS process and they will not receive a response.

1. Is this the first EIS you have read?
 Yes No

4. Did the graphics help make the Draft EIS easier to review and understand?
 Yes No

2. Have you previously participated in public meetings/comment periods related to transportation projects?
 Yes No

5. What did or didn't you find helpful when reading this Draft EIS?

3. Did you find this Draft EIS format easy to understand?
 Yes No
Why or why not?

That the DOT give priority to construction companies that include in their bids a commitment to working with Casa Latina to employ our workers in the construction

C-045-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

WSDOT will comply with the federal requirements for disadvantaged business enterprise (DBE) participation. WSDOT cannot require contractors to hire workers from specific organizations. However, WSDOT can and does encourage contractors to work with local organizations and to develop programs that draw on the local labor pool.

C-045-001



Alaskan Way Viaduct and Seawall Replacement Project

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Contact Information: At a minimum, please provide your name and Zip Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

Name: GREG SCHULER
Organization/Membership Affiliation (optional): Belltown Business Association
Address: 40 Antioch University Seattle, 2326 SIXTH AVENUE
City: Seattle State: WA Zip: 98121
E-mail: gschuler@antiochsea.edu

Check here if you would like to be added to the project mailing list.

1. Choose a topic:

- Overall Project
- Tunnel Alternative
- Construction Impacts and Mitigation
- All of the Alternatives
- Bypass Tunnel Alternative
- Other
- Rebuild Alternative
- Surface Alternative
- Aerial Alternative
- Seawall

What are your comments about the project?

C-046-001 1 EIS provides insufficient information about traffic impacts in Belltown during construction periods for each alternative. It provides insufficient information about construction traffic routing and volumes for each alternative (dump trucks, concrete, resteel, etc.)

C-046-002 2 What is the evaluation, public comment/participation, and approval process from this point including Schedule?
(Please use additional paper if you need further comment space)

C-046-001

More detailed construction-related traffic impacts and mitigation measures on parallel facilities to the Alaskan Way Viaduct (such as Alaskan Way, Western Avenue, First Avenue, etc.) are included in Appendix C, Transportation Discipline Report, of the Final EIS. Additionally, the project team will be working specifically with residents and businesses in communities adjacent to the construction zone to address their concerns regarding diverted through-traffic and construction traffic impacts as construction phasing and staging plans are developed for the alternatives.

C-046-002

Chapter 3 of the Final EIS describes the public process the project will follow to move the project forward. FHWA, WSDOT, and the City of Seattle have provided many opportunities for additional public discussion between the time the 2004 Draft EIS was published and the Final EIS.

North Seattle Industrial Association
P. O. Box 70328
Seattle, WA 98127-0328
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September 21, 2006

Kate Stenberg
WSDOT, Environmental Manager
Alaskan Way Viaduct and Seawall Replacement Project
999 Third Ave, Suite 2424
Seattle, WA 98104

Dear Ms. Stenberg:

The North Seattle Industrial Association has reviewed the Alaska Way Viaduct Replacement DEIS and SEIS and has found deficiencies in the analysis. We request that these deficiencies be addressed in the FEIS.

We believe that the DEIS and SEIS are remiss in addressing the following areas:

- C-047-001** | 1. Direct construction impacts that are uniquely the North Seattle Industrial Association businesses are not adequately evaluated for either alternative. These impacts include freight movement, business trips, commute trips, airport trips, and medical trips. The direct impacts on those trips that currently use SR-99 are not discussed.
- C-047-002** | 2. Indirect construction impacts on North Seattle Industrial Association are not addressed for either alternative. The closing of SR99 and the Alaskan Way surface street will cause congestion throughout the region. No reasonable alternative routes have been provided. I-5 cannot handle more congestion. How will workers and supplies get to the North Seattle Industrial Association businesses?
- C-047-003** | 3. What are the economic impacts of traffic delays caused by construction? This is a NEPA document and economic impacts should be quantified, not discussed in generalities. The EIS does not adequately discuss the economic impacts from the travel delays caused by the direct and indirect construction impacts of either alternative. The job losses in the North Seattle Industrial Association area could be significant as the raising cost of finding employees could be prohibitive, cost of shipments increase, businesses moving to areas without delays, etc.
- C-047-004** | 4. The effect on air quality from construction gridlock and detours are not adequately discussed for either alternative.

C-047-001

A detailed analysis of construction-related transportation effects is provided in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report. Among other things, the analysis covers travel times, intersection operations, and freight mobility for trips traveling through the project area.

C-047-002

An updated analysis of construction-related transportation effects is provided in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report.

C-047-003

Construction expenditures would occur over a number of years, directly resulting in new demand for construction materials and labor. These direct effects would lead to indirect or secondary effects, as the production of output by firms in other industries increases to supply the demand for inputs to the construction industry. Both the direct and indirect effects of construction expenditures typically cause firms in all industries to employ more workers to meet the increased demand. The increase in employment leads to induced effects because the additional wages and salaries paid to workers foster greater consumer spending. The mitigation measures for the build alternatives vary somewhat, especially when comparing the Bored Tunnel Alternative to the Cut-and-Cover Tunnel and Elevated Structure Alternatives. The mitigation measures for all the build alternatives, however, have common themes:

- Focusing on clearly defining and directing pedestrian and vehicle traffic in a systematic and streamlined manner
- Providing adequate parking for construction workers and encouraging short-term parking along the waterfront
- Distributing timely and informative project and construction updates
- Providing noise mitigation

- C-047-005** | 5. The impacts of a 7% grade associated with the tunnel option were not adequately discussed in either EIS. The 7% grade in the proposed tunnel configuration will slow the movement of traffic north on SR-99, particularly truck traffic.
- C-047-006** | 6. The EIS does not adequately discuss the impact to flammable and hazardous materials transport through the corridor, during and after construction for either of the alternatives. The impacts could force North Seattle Industrial Association businesses to close.
- C-047-007** | 7. The EIS does not adequately discuss the mitigation costs. Without these costs it is hard to evaluate the two alternatives. The added mitigation costs might cause both alternatives not to be built.
- C-047-008** | 8. The EIS is confusing on the role of the Broad Street overpass is not explained. It is hard to see how the detours outlined in the document work.
- C-047-009** | 9. The Seattle Monorail program was presented in the draft EIS as a form of mitigation to traffic impacts. The Monorail is not going to be constructed; this changed condition was not addressed in the SEIS and should be addressed in the FEIS.
- C-047-010** | 10. View Blockage. Seattle residents and visitors enjoy views of the Olympics, City and the waterfront from the current elevated structure. Under the tunnel alternative they will be removed. The EIS suggests that the removal of the elevated structure will increase the views for the general public. This reflects faulty analysis inasmuch as there are many structures blocking the views which will not be removed. Some views may be increased for inhabitants of buildings that currently exist or may be built along Western Avenue, but the number of people that would receive benefit from the demolition of the elevated structure is very small compared to the number that benefit from the views from the elevated structure on a daily basis.

Sincerely yours,



Eugene Wasserman
President

Preserving and protecting North Seattle's unique and diverse industrial heritage
and resources for everyone

- Preparing and assisting businesses within the project area to maintain an accessible and profitable business

The build alternatives would result in enhanced mobility to activity centers in both the south and north portal areas and beyond, particularly to the SODO commercial and business district and the stadium area. Overall, the infrastructure improvements in the north portal area would improve truck freight mobility and vehicle and pedestrian connections. In turn, these benefits would improve business efficiencies due to the increased circulation near the project area. The build alternatives would contribute to local and regional mobility by providing drivers with an alternative to I-5 and Seattle's surface streets. The benefits of the Elevated Structure Alternative would not be as substantial as those described for the Cut-and-Cover Tunnel Alternative and Bored Tunnel Alternative. A more in-depth discussion of economic effects is provided in Appendix L, Economics Discipline Report. A more in-depth discussion of mobility, including freight, is provided in Appendix C, Transportation Discipline Report.

The specific losses that may or may not materialize for businesses outside of the area of immediate impact would be subject to economic forces beyond the control of this project and cannot be calculated without speculation.

C-047-004

Air quality effects during construction would occur primarily as a result of dust and emissions from construction equipment (such as bulldozers, backhoes, and cranes), diesel-fueled trucks, diesel- and gasoline-fueled generators, and other project-related vehicles such as service trucks. Potential air quality impacts during the construction period have been estimated and are discussed in Appendix M, Air Discipline Report. A more in-depth discussion of mobility, including congestion and detours,

is provided in Appendix C, Transportation Discipline Report. Please refer to the Final EIS for current information.

C-047-005

Heavy vehicles constitute approximately 6 percent of the Average Daily Traffic (ADT) volume in the northbound direction. The Bored Tunnel grades do not exceed 4 percent and should not pose an impact to trucks traveling in the tunnel. The Cut-and-Cover Tunnel Alternative south of the south tunnel portal has grades of 6.5 percent (steepest grade), but this section is no more than 800 feet long.

C-047-006

At this time, transporting hazardous materials in the Battery Street Tunnel is prohibited. The Final EIS notes that hazardous and flammable cargo would be prohibited in the Bored Tunnel Alternative as well. Currently, hazardous/flammable materials can be transported on downtown city streets without restriction, as long as the trucks do not exceed 30 feet in length. Vehicles exceeding 30 feet in length carrying hazardous or flammable materials wishing to travel through downtown Seattle would continue to use I-5 or Alaskan Way. This practice is not expected to change as a result of Alaskan Way Viaduct Replacement Project construction activities.

C-047-007

Cost estimates for the alternatives currently being evaluated include current proposed mitigation measures and a reasonable allowance for additional mitigation measures that have not yet been identified. Costs in and of themselves are not an environmental subject normally discussed in an EIS. Please refer to the Final EIS for current information.

C-047-008

The Broad Street Detour described in the Final EIS is only for the

Elevated Structure Alternative. The detour would construct a temporary trestle structure from approximately Alaskan Way and Vine Street to the intersection of Broad Street and Western Avenue. The Broad Street Detour would be in place for approximately 27 months while the improvements to the Battery Street Tunnel are completed. An updated description of the alternatives and of construction-related transportation effects is provided in the Final EIS and Appendix C, Transportation Discipline Report.

C-047-009

The Seattle Monorail Project's Green Line is no longer being considered for implementation, and therefore cannot be assumed as a mitigation strategy to either complement or replace the project. However, other high-capacity transit developments that are currently being planned or implemented (e.g., RapidRide, Link light rail) would address many of the trips that are made on a daily basis through the Alaskan Way Viaduct corridor. The transportation analysis described in the Supplemental Draft EISs and Final EIS (including Appendix C, Transportation Discipline Report) was conducted assuming this changed condition.

C-047-010

Many people have expressed that they enjoy the views when traveling on the viaduct. The visual character and quality of the views, as well as the likely viewer response of drivers and passengers are discussed in Final EIS Appendix D, Visual Quality Discipline Report. The analysis considers the SR 99 corridor, which is designated as a City of Seattle Scenic Route, and identifies and assesses other designated view corridors primarily along east-west streets. Views from the roadway and of the roadway are both assessed.

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September 14, 2006

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Re: Comments on Behalf of Waterfront Landings Condominium Regarding Draft Supplemental EIS (DSEIS)

Dear Ms. Stenberg:

WATERFRONT LANDINGS

C-048-001

These comments are submitted on behalf of Waterfront Landings Condominium. It is a 232-unit residential condominium community with an aggregate value of over \$125 million, located on Alaskan Way between Pike and Lenora Streets, immediately adjacent on three sides to the Alaskan Way Viaduct and Seawall Replacement Project ("Project"). The Waterfront Landings community includes 376 residents who call the waterfront their home. They have chosen to live there because of its scenic beauty, the amenity of its pedestrian environment, and its easy access to downtown Seattle. As with most people, the owners' investment in their homes is one of their largest and most important financial assets. Over 10% of the homes in Waterfront Landings are sold each year, and each of the residents would be at severe risk if the marketability of their home was destroyed or its value severely depressed for several years.

C-048-002

Either of the alternatives discussed in the DSEIS will destroy the qualities that drew the homeowners to Waterfront Landings, for a minimum of 7, and perhaps 10 or more years. The environmental impacts of the construction process risk subjecting them to loss of quiet enjoyment of their homes, interminable nights of lost sleep, and potential adverse health impacts. Each of the alternatives is likely to severely depress, and perhaps destroy, the market for their homes during much of that period. The fundamental environmental issue for them – which they find the DSEIS unable to answer – is whether the construction process will have such severe environmental impacts that their homes become uninhabitable.

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C-048-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments and recognize the owners' concern for their property's value.

C-048-002

The specific mitigation measures presented in the Final EIS address many of the concerns raised in your letter. Specific to noise impacts, the project will be subject to the City of Seattle's noise variance process prior to nighttime construction activity. The noise variance, if granted by the City, will establish clear limits for nighttime construction noise and required mitigation measures for the contractor to follow.

Impacts to properties will be evaluated in accordance with the state and federal requirements for property acquisition, after considering the implementation of mitigation measures to minimize project-related impacts as discussed in the noise, air quality, transportation, and other pertinent sections of the Final EIS. At that time, a determination will be made whether it is necessary to acquire a particular property, or an interest in property, for the project.

GENERAL COMMENTS

C-048-003 In light of the comments submitted by Waterfront Landings Condominium and others on the March 2004 Draft EIS, Waterfront Landings is extremely disappointed in the DSEIS. It continues to fail to provide sufficient information about the impacts of the construction of the Project to permit either the public or decision makers to accurately understand the Project's environmental consequences. While in a more typical highway construction project the impacts of construction may be just one of those things that the public needs to endure in order to reap the benefits of the completed Project, here, where the construction process will disrupt much of the city for upwards of a decade, the environmental consequences of the construction process are the most significant impacts to be considered. High quality information that can be subjected to public scrutiny and comment are essential if the public and decision makers are to be able to make the sort of informed decisions that NEPA and SEPA mandate. Unfortunately, the DSEIS continues to be sadly lacking.

C-048-004 The DSEIS appears to have been drafted based on one or all of three false assumptions:

False Assumption One: *The only significant impact of the construction of this major highway through the heart of a major urban area is the impact on the users of the road.*

Except for discussion of the impacts of construction on the users of SR 99, discussion of construction impacts continues to be vague, general, and lacking in any detail or analysis. No support is provided for key conclusions. Contrary to this first false assumption, however, the construction of the Project will have profound and adverse impacts on not just the users of SR 99, but on all of downtown Seattle, and of course specifically on the waterfront neighborhoods. To provide meaningful information the EIS needs to recognize that the impacts of construction are not generic to the entire route, but will vary, block by block. Detailed information, specific to the various impacted neighborhoods, is required in order for the public and decision makers to understand the impact of the Project.

C-048-005 **False Assumption Two:** *Because the scope of the construction and its adverse impacts are so extraordinary, the normal requirements of NEPA and SEPA can't be expected to apply to the Project. The EIS should not be expected to identify environmental effects and values in adequate detail so they can be compared to economic and technical analyses. The EIS need not include appropriate mitigation measures that are part of the proposal. The description of the affected environment can be general and need not allow the reader to understand the Project's impacts. The EIS need only analyze those alternatives that the Project proponent has previously determined will be considered, and need not analyze other alternatives that might feasibly attain or approximate the goals of the Project but at lower environmental cost.*

C-048-003

The description of construction impacts provided in the 2006 Supplemental Draft EIS accurately disclosed potential impacts with sufficient detail and accuracy to inform the public and decision-makers, as required by both NEPA and SEPA. The project has since changed, as described in Chapter 2 of the Final EIS. Please refer to the Final EIS for complete current information.

C-048-004

Construction impacts to areas adjacent to the project are described in Chapter 6 of the Final EIS, with specific discussion of how impacts will vary by location. More detailed descriptions of construction effects are provided in the technical appendices.

C-048-005

The description of operation and construction effects of the project, and associated mitigation measures, fully meets NEPA and SEPA requirements. Additional detail would not alter the fundamental conclusions and statements of fact provided but would be speculative.

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C-048-005 Each of those false assumptions is in direct conflict with NEPA and SEPA. See, e.g., 40 CFR § 1501.2(a) and (b), 1502.14(f), 1502.15, WAC 197-11-440(6). To the contrary, the magnitude and severity of the impacts of construction of the Project make it particularly important that NEPA and SEPA be complied with to the fullest for this Project.

C-048-006 **False Assumption Three:** *The DEIS and DSEIS at most need to provide a list of possible mitigation measures, with the actual mitigation plan to be determined later through a separate series of processes. The actual mitigation to be provided need only be disclosed in the Final EIS.*

This assumption again is in direct conflict with the NEPA and SEPA rules and governing judicial decisions. See, e.g., 40 CFR § 1502.9(a), 1502.14(f), 1502.16(h), WAC 197-11-440(6), *Neighbors of Cuddy Mountain v. United States Forest Service*, 137 F.3d 1372, 1380 (9th Cir. 1998). To the contrary, there are at least three compelling reasons why NEPA and SEPA require that proposed mitigation and its effects on the impacts of the Project be spelled out in the draft EIS.

First, the detailed statement required by NEPA and SEPA provides a practical, and therefore functional, means to obtain meaningful public input to decision makers. NEPA and SEPA presume that through their requirement of a "detailed statement" of the environmental impacts, members of the public can go to a single document, determine the impacts, see the proposed mitigation, and make meaningful comments about the adequacy of the mitigation, or about whether, in light of the significant adverse environmental impacts that cannot be mitigated, it is essential that other alternatives be developed. But here instead of providing one central place for the public to reference in order to understand what mitigation is being proposed, the Project team says it will later develop a construction mitigation plan (DSEIS at 103), later develop a construction transportation management plan (DSEIS at 104), later develop a noise mitigation plan (*Id.*) and later develop a Residential Mitigation Plan (*Id.*). For each of these mitigation plans the DSEIS promises "an extensive public review and involvement process." (*Id.*) While the Project proponents can apparently afford to hire consultants to attend an infinite number of public meetings and "public review processes," members of the public cannot. They have jobs and families to attend to, and they do not have unlimited time or tax money to pay for their own consultants. As a result, the endless public process that the Project proposes to substitute for disclosure of the mitigation in the EIS will effectively deprive much of the public of meaningful opportunity for input. Residents of Waterfront Landings have already attended numerous meetings with Project staff, none of which have resulted in any substantive commitments concerning mitigation. They should not be expected to go to meeting after meeting, each time in the vain hope that real mitigation will finally be discussed.

C-048-006

Mitigation, like project plans, evolve and are refined through the development process. The 2004 Draft and 2006 and 2010 Supplemental Draft EISs have each described mitigation at a level of detail appropriate to the design at that time. Continued analysis and work with affected parties like the waterfront businesses has led from the general types of mitigation discussion contained in the Draft EIS to the more specific measures contained in the Final EIS. Mitigation commitments will be described in the Record of Decision, per NEPA regulations.

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C-048-006

Second, the requirement of NEPA and SEPA that the proposed mitigation be set forth in the draft EIS means that all affected members of the public can comment on the mitigation. It is inevitable that when the undisclosed mitigation plans are developed, the mitigation itself may have significant adverse environmental impact on people who didn't realize they would be impacted and thus did not participate in these separate mitigation processes the Project contemplates. Because the actual mitigation will only be disclosed in a document to which all members of the public have equal access in the Final EIS, and because by the time the FEIS is issued, key decisions about the Project will already have been made, members of the public who do not happen to have been clued into the particular public process that ends up impacting them will be denied any opportunity for meaningful comment.

Third, one of the most important functions of NEPA and SEPA is to insure that before there is an irretrievable commitment of resources to a proposal, the significant adverse impacts that cannot be mitigated have been disclosed. The correlative function of NEPA and SEPA are to insure that reasonable alternatives are considered that could feasibly attain or approximate the proposal's objectives but at a lower environmental cost. None of that can happen, however, until the impacts of the Project with the proposed mitigation have been disclosed. As discussed below, the DSEIS is seriously inadequate in its disclosure of the construction impacts on Waterfront Landings. But – the impacts without mitigation and the impacts with mitigation may be two quite different things. Without knowing the mitigation, there is no way to know whether the construction process will be difficult but survivable for the residents of the Waterfront Landings, or whether it will be devastating to them. Similarly, there is no way to know whether in light of the impacts of construction it is imperative that another alternative be pursued. In short, the absence of real mitigation proposals causes the DSEIS to fail to achieve its most basic purposes of providing a foundation for critical decision-making.

SPECIFIC COMMENTS

C-048-007

NOISE

In a marvel of imprecision, the DSEIS says "noise during construction would be bothersome and annoying to nearby residents, ... because it would make it unpleasant to be outside and hard to hold conversations. DSEIS at 32. The DSEIS says construction could occur 24/7 and that the maximum sound levels would reach 100 dBA, but will "vary considerably" over time. Id. Mitigation will be determined through a variance process, which will not be completed until after the FEIS is issued. Id. at 104.

That provides completely inadequate information for Waterfront Landings Condominium. It needs to know what the noise levels will be for its residents, at their units and in their common areas, over what period of time. While we can assume that noise levels will "vary," it is essential

C-048-007

The construction plans evaluated for noise and vibration are described in the Final EIS Appendix B, Alternatives Description and Construction Methods Discipline Report. While actual construction plans and activity sequencing could differ from this evaluation, the locations and types of activities would be similar under the final sequence.

Construction of the project will require nighttime construction activities, and the City requires a Major Public Project Noise Variance. Construction noise mitigation requirements would be developed and specified in the noise variance. The Major Public Project Noise Variance will be presented for public comment. Mitigation measures for noise effects are described in the Final EIS and Appendix F, Noise Discipline Report.

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C-048-007 | to understand whether the peak noise levels will be occasional and planned for, with noise levels during the bulk of the time being consistent with residential use of their homes, or whether noise levels in the 65-95 dBA range will be continuous or repeated, and over what period of time. That is the sort of information that will make the difference between the construction noise being endurable, or the homes in Waterfront Landings being uninhabitable. There is simply not enough information provided in the DSEIS to know the significance of the impacts.

C-048-008 | The DSEIS shows that the triangular parcel immediately to the south of Waterfront Landings, including the extension of Pike Street abutting Waterfront Landings, will be acquired under any alternative considered, and Piers 62 and 63 will be acquired under the stacked tunnel alternative. DSEIS, Appendix K, Exhibits A-2, A-5 and A-8. The DSEIS does not disclose the use to be made of either parcel, and there is therefore no basis to guess at the noise that will be generated on those parcels. Waterfront Landings must assume, therefore, that construction activity will be going on 24/7 immediately outside the bedroom and living room windows of residents. Construction of the Aquarium addition demonstrated that noise from activity on Piers 62 and 63 is extremely disruptive to residents along much of Waterfront Landings. A full and accurate characterization of the activity and the noise to be generated on those two properties is essential. It is simply not adequate to say "the amount of construction activity would quantify how often construction noise would occur" DEIS, Appendix F, at 64. That discloses nothing at all.

C-048-009 | The DEIS mischaracterizes the existing noise environment of Waterfront Landings as a residential property. It is important to accurately characterize the existing environment as it is experienced by Waterfront Landings residents, because by overstating the noise in the existing environment, the DEIS masks the extent of the impact of construction noise. The 2004 Noise and Vibration Discipline Report (Noise Report) describes the existing L_{dn} and the loudest hour L_{eq} of Waterfront Landings as 80. DEIS, Appendix F, at 31. The Noise Report shows that the measurement was taken at the rear of the Waterfront Landings building, where the train tunnel and the viaduct cross – the noisiest possible location. It should come as no surprise, however, that the developer of Waterfront Landings invested in substantial sound insulation on the rear face of the building.¹ The rear face of the building has no windows, and no units are on that face; the common hallway is the only thing along the east face of the building, and it is insulated so that neither the train nor the viaduct are audible from inside the building. The residential units face to the south, west and north, where the environment is far quieter. Were the only construction activities at the rear of the building, the noise impacts on Waterfront Landing might not be significant. But construction activities are slated to occur to the south and the west of

¹ The DSEIS describes 80 dBA as the equivalent of a vacuum cleaner at 3 feet, obviously not a noise level that would be tolerable in a residential situation on a continuous basis.

C-048-008

The Final EIS contains the current information about proposed parcel acquisitions and their construction use for all the build alternatives, including the preferred Bored Tunnel Alternative. Note that the Bored Tunnel Alternative minimizes construction noise along the waterfront.

C-048-009

Since the publication of the 2006 Supplemental Draft EIS, an additional noise measurement was taken at the Waterfront Landing Condominiums and will be used to calculate the noise levels limits for the construction noise variance application. Please see the Final EIS Appendix F, Noise Discipline Report, for the current information.

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C-048-009 Waterfront Landings, where viaduct noise impact is now minimal and where the existing noise environment is typical of urban residential areas. In order to determine the magnitude of the construction impact the EIS must first establish the level of noise in the area actually being impacted. For that, it is essential to measure the existing environment where the residents actually experience noise.

C-048-010 Once the nature and magnitude of the impact is established, the EIS must also address potential health effects of prolonged exposure to the projected noise, including the potential health impacts of years of sleep disruption. The Noise Report makes it clear that noise may be at levels where hearing loss occurs with prolonged exposure. DSEIS at 97, DEIS Noise Report at 64-65. We doubt that the loudest noise will be sufficiently prolonged to result in hearing loss. But, being subjected to high levels of noise for 7 to 10 years, particularly all night long, will lead to stress and sleep deprivation, which themselves can have serious health impacts. The EIS should disclose the health impacts of being forced to live for years in the noise environment that will exist during construction.

C-048-011 Finally, once the nature and magnitude of the noise impacts on the Waterfront Landings residents is disclosed, the Project must come forward with a real mitigation plan that makes those homes habitable, or which discloses honestly that they will not be habitable and assures the residents just compensation. In developing that mitigation plan, the Project should take into account that (1) a significant portion of the Waterfront Landings homes are not air conditioned, and therefore must be able to open their windows for ventilation, and (2) even in the air conditioned units, outdoor noises on the waterfront (i.e., Piers 62 and 63) are readily transmitted through the windows. Any noise mitigation plan must also be enforceable by the residents, with real penalties for violation, providing them with real compensation. Although until there is disclosure of the actual noise impacts of the Project it is impossible to tell what mitigation may be adequate, the laundry list of potential mitigation listed in the Noise Report is unlikely to make the homes habitable.

C-048-012 **LIGHT AND GLARE**

Light and glare are elements of the environment that must be discussed in an EIS, WAC 197-11-444(2)(b)(iii), but neither the DSEIS nor the DEIS discuss the impacts of light and glare on adjacent residents. In order to safely permit 24/7 construction, the Project area will need to be lighted 24/7. "Shielding" the light to direct it downwards will be of very little benefit because the ground itself will reflect the light back into the atmosphere. The potential impact will be that residents will be deprived of the darkness homeowners expect, particularly for sleeping. The EIS must describe the light and glare impact on adjacent residents and come forward with effective mitigation for that impact.

C-048-010

Please see the response to comment C-048-007. Also, the Final EIS does not consider the potential noise indirect effect of poor health due to sleep deprivation. Construction for any alternative would be phased so one area along the viaduct alignment would not be subjected to, say, 7 years of constant construction noise. With the preferred Bored Tunnel Alternative, the main construction noise in the vicinity of the Waterfront Landings would be during the demolition of the old viaduct, which would take about 9 months.

C-048-011

Please see the response to comment C-048-007.

The project's public involvement process will continue through project construction. During project construction the public will be able to contact the project with construction-related complaints. This process will include a mechanism for tracking, evaluating, and resolving public complaints by taking appropriate corrective measures. The complaint resolution procedure will be submitted during the public hearing process as part of the Technical Noise Variance application.

C-048-012

Light and glare impacts and proposed mitigation measures are discussed in the Final EIS and in Appendix D, Visual Quality Discipline Report, as an element of the visual environment. Lighting on the existing viaduct and arterial lighting on surface streets, including Alaskan Way, generates a high level of ambient light. For the Waterfront Landing homes between Pine Street and Lenora Street, an additional source of light is the Port of Seattle Pier 66 Bell Harbor marina. Residents have likely already made provision for high urban ambient light levels in the area through various window shade treatments. Impacts of light and glare on sleeping residents are not expected from any of the build alternatives during operation or construction.

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C-048-013

VIBRATION

The DSEIS is also inadequate in failing to recognize the significant adverse impacts of vibration on residences such as Waterfront Landings. In response to question 12 on page 98 of the DSEIS, the DSEIS identifies five generalized construction impacts on neighborhoods: traffic detours, traffic congestion, noise, air pollution, and light and glare. None of those impacts are quantified or described in a manner that allows the reader to assess their significance. Vibration is not mentioned. The only other mention of vibration is on page 97 of the DSEIS, which says that vibration impacts will be the same as disclosed in the DEIS. The DEIS, at page 147, made clear that only potential structural damage from vibration was of concern to the Project.

The Noise Report, at 18, discloses the criteria for assessing human sensitivity to vibration adopted by the International Organization for Standardization (ISO) and the American National Standards Institute (ANSI), as shown below:

Criteria for Annoyance Caused by Ground-borne Vibration

Building Use Category	Maximum Vibration Velocity (inches/second)	Comments
Hospital and critical areas	0.005	
Residential (nighttime)	0.007	
Residential (daytime)	0.01	Criterion also applies to churches, schools, hotels, and theaters
Office	0.02	Criterion applies to commercial establishments
Factory	0.03	Criterion applies to Industrial establishments

Source: ISO Standard 2631 (1974) and ANSI Standard S3.29-2001.

The Noise Report goes on to state, however, that, "the primary concern with regard to construction vibration is building damage," (Noise Report at 18) and proceeds to discuss the vibration levels that risk structural damage to sensitive buildings. It then says:

2.10.4 Vibration Criteria Adopted for this Project

Because FHWA, WSDOT, and the City of Seattle do not have specific vibration impact criteria, a vibration impact criterion of 0.12 inches/second PPV has been adopted for extremely fragile structures and 0.50 inches/second for all other occupied buildings.

C-048-013

Impact pile driving would be the most significant source of vibration for this project. Several potential mitigation measures to reduce vibration from impact pile driving that can be used by the contractor, when appropriate for specific site conditions, are outlined in the Final EIS Appendix F, Noise Discipline Report.

The contractor would be required to monitor vibration at the nearest historic structure or sensitive receiver to the construction activities. The monitored data would be compared to the project's vibration criteria to ensure that ground vibration levels do not exceed the damage risk criteria for historic and non-historic buildings. The project's vibration criteria would likely be coordinated with the City of Seattle.

Vibration from other construction activities can be reduced by either restricting their operation to predetermined distances from historic structures or other sensitive receivers, or using alternative equipment or construction methods. An example would be the use of saws or rotary rock cutting heads to cut bridge decks or concrete slabs instead of a hoe ram.

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C-048-013 Those are the levels above which structural damage is possible. In short, the Noise Report sets the vibration criteria for the Project at 50 times the accepted level at which vibration is annoying to residential uses during the daytime and more than 70 times the level at which vibration is annoying to residential uses at night. The Noise Report discloses that Project activities such as impact pile driving may exceed the level that risks structural damage to buildings. Noise Report at 71, see also DEIS at 147. Nonetheless, the EIS discloses no adverse impacts from vibration on residential uses, and provides no analysis of the impact of vibration on residents of Waterfront Landings.

A detailed analysis of vibration impacts on the residents of Waterfront Landings is required in order to allow any assessment of whether their homes will remain habitable during construction. Waterfront Landings is built on pilings that reach into competent soils. The loose soils the pilings pass through seem to transmit vibration exceptionally well, so that residents feel vibration from trains or trucks on the street, even when they don't hear them. With the Project making no effort to limit vibration more than 70 times the recognized level at which nighttime vibration is annoying, Waterfront Landings residents must assume they are facing years of sleep deprivation from vibration. But, with no data or analysis presented concerning the expected impacts on Waterfront Landings, there is simply no way to know. It is critical information in order to judge the extent of the adverse impact of construction upon them.

Once that analysis is provided, then a mitigation plan must be developed. Because the EIS does not recognize the adverse impact vibration may have on nearby residences, it makes no provision for mitigation.² Finally, as with noise, there must be an honest assessment of whether the Waterfront Landings residences will remain habitable. If not, just compensation must be provided.

C-048-014 ² The DSEIS acknowledges the potential for significant adverse impacts of vibration on animal life, because on page 105 in discussing potential mitigation of construction effects on parks and recreation facilities it proposes relocating parts of the Seattle Aquarium animal collection during times or seasons when animals are especially sensitive, or during the periods of highest construction noise and vibration. If vibration impacts are expected to be sufficiently serious so that animals in the Aquarium need to be relocated, at the very least the EIS needs to fully disclose the impacts on humans who are similarly situated.

C-048-014

The Final EIS describes the operational and construction noise and vibration effects on the people who work or reside in the project area.

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C-048-015 CLOSURE OF ALASKAN WAY³

Today Waterfront Landings residents have two routes to access their homes or the rest of Seattle – from the south or the north on Alaskan Way. The route to the north is frequently highly congested by loading, unloading and provisioning of cruise ships at Pier 66, or blocked by trains at all east-west intersections. On those occasions, however, residents can use Alaskan Way to the south.

The DSEIS discloses that, assuming the seawall is not rebuilt north of Pike Street, Project construction will restrict Alaskan Way south of the Seattle Aquarium to one lane for a minimum of three and a half years and potential close it for from three and a half to six and a quarter years.⁴ DSEIS at 84. It provides no analysis or discussions, however, about the impact that closure will have on congestion of Alaskan Way north of Pike Street, or how the Project will mitigate the loss of access to Waterfront Landings.

C-048-016 The DSEIS also states that if the long construction plan for the elevated structure were chosen, the Project would further reduce the capacity of Alaskan Way north of Pike Street by constructing a temporary viaduct in front of Waterfront Landings and at Broad Street to use as a detour route for traffic on SR 99. That would consume lane space on Alaskan Way taken up by the temporary viaduct, and put tens of thousands of additional trips per day on Alaskan Way north of Pike Street.⁵ The DSEIS does not disclose how many trips the Broad Street detour would add to Alaskan Way.

C-048-017 ³ The DEIS and DSEIS sometimes treat Alaskan Way and SR 99 as if they are the same road. They are not. In these comments, "Alaskan Way" is the city surface street that runs along the waterfront from SR 519 to Broad Street. SR 99 is the state highway running the full width of the state, which roughly parallels Alaskan Way with an elevated structure along Seattle's Central Waterfront. The residents of Waterfront Landings at most use SR 99 occasionally. They are entirely dependent upon Alaskan Way.

⁴ Seawall reconstruction north of Pike Street is discussed below.

C-048-018 ⁵ In its comments on the DEIS Waterfront Landings made clear its inalterable opposition to the Broad Street detour. It will not repeat those comments here, although they are unchanged. The proposed temporary viaduct in front of Waterfront Landings would have all the noise impacts of the existing viaduct, but this time from the west, where Waterfront Landings units are most vulnerable to noise. It would completely destroy the primary amenity of residents' homes – the view. There is no clearer illustration of the statement at the beginning of this letter that the EIS has been drafted on the false assumption that the only significant adverse impacts of construction are the impacts on users of SR 99 than the EIS's total failure to discuss the adverse impacts of the Broad Street detour.

C-048-015

Access to Waterfront Landings will be maintained during construction. Impacts to traffic during construction have been updated and are summarized in the Final EIS and discussed in more detail in Appendix C, Transportation Discipline Report. Strategies for mitigating impacts from project construction can also be found in these documents.

C-048-016

The Broad Street detour proposed under the Elevated Structure Alternative is expected to carry southbound traffic during portions of construction. Approximately 2,600 southbound vehicles currently travel through the Battery Street Tunnel during the PM peak hour, typically the most congested hour during the day. The Broad Street detour would provide an alternate route for these travelers during construction. However, the Broad Street detour follows surface arterials as it exits southbound SR 99. Therefore, traffic capacity on these dedicated lanes may not be equal to the current capacity of two lanes of SR 99. The capacity Broad Street detour is expected to be between 800 and 1,200 vehicles per hour, in addition to local traffic already traveling along these roadways. The remainder of the detoured traffic is expected to divert to use City streets in the downtown area to reach their final destinations. Updated analysis of the traffic impacts during construction have been conducted for the Elevated Structure Alternative as part of Appendix C, Transportation Discipline Report, of the Final EIS.

C-048-017

The lead agencies understand that the Waterfront Landing residents utilize Alaskan Way extensively. The analysis in the EIS does not treat the Alaskan Way surface street and the Alaskan Way Viaduct as the same roadway except for in the 2004 Draft EIS Surface Alternative. The Surface Alternative would have placed SR 99 traffic on a widened Alaskan Way surface street through the central waterfront, which could

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C-048-019 The DSEIS does not disclose the other congestion impact on Alaskan Way North of closing Alaskan Way south of Pike Street. That is that the dozens of buses that bring children to the Seattle Aquarium daily and bring passengers from Sea-Tac Airport to Pier 66, and the semi-trailer trucks that bring provisions to the cruise ships, will be operating in a dead end street, with nowhere to turn around. They all create significant congestion on Alaskan Way North in the existing condition. If they must attempt to turn around on Alaskan Way, or attempt to back out, Alaskan Way North will be even more gridlocked than it already is.

The Project must describe how it expects to mitigate the impact of closure of Alaskan Way on the Aquarium and the cruise ship terminal, in light of the blockages created by the railroad, the need to park and turn numerous buses and trucks around on what will become a dead end street, and the additional traffic created by the Broad Street detour if it is to be implemented. Once those issues have been addressed, it must describe the impact on access to Waterfront Landings.

PARKING

C-048-020 The DSEIS states that all parking will be removed from Alaskan Way North during construction. DSEIS at 100. It also implies, although that cannot be determined from the DSEIS, that the parking will be eliminated on the triangular parcel south of Waterfront Landings. If true, that will eliminate all visitor and service provider parking for the residents of Waterfront Landings. It is essential that the EIS disclose how that visitor and service provider parking will be replaced or the loss of all such visitor parking will be mitigated. In considering mitigation it is also important to remember that guests of Waterfront Landings include elderly friends and parents of residents who cannot be expected to walk several blocks from where they park.

C-048-021 The DSEIS also implies, although again that cannot be determined because the DSEIS does not disclose what use will be made of the parcel, that by taking the extension of Pine Street immediately to the south of Waterfront Landings, the Project may block the southern access to Waterfront Landings' parking garage. That would severely compromise its utility and is unacceptable to Waterfront Landings. The EIS must disclose any impact on the Waterfront Landings parking garage access.

C-048-022 Finally, SDEIS, Appendix C, at p. 99, suggests that the Project may believe that it can mitigate the loss of parking by "increased utilization of existing parking." It bases that on a 2004 inventory of parking utilization conducted by the PSRC. We have reviewed that study. It provides no information as to where the surveyors found unutilized parking. It does say that surveyors counted vacant spaces twice at each location they surveyed – once between 9:30 and 11:30 and again between 1:30 and 3:30 on a Monday through Thursday, sometime between March and June 2004. Parking demand along the waterfront is seasonal and parking space along the waterfront is not used by commuters. We have no doubt that there is ample parking available

have caused the terminology confusion. That alternative is no longer being considered.

C-048-018

The Broad Street Detour described in the Final EIS is only for the Elevated Structure Alternative. The detour would construct a temporary trestle structure from approximately Alaskan Way and Vine Street to the intersection of Broad Street and Western Avenue. The Broad Street Detour would be in place for approximately 27 months while the improvements to the Battery Street Tunnel are completed. An updated description of the alternatives and of construction-related effects is provided in the Final EIS and supporting discipline reports.

C-048-019

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

The Final EIS Appendix C, Transportation Discipline Report, includes strategies for addressing loading/unloading that takes place north of Pike Street on Alaskan Way. The project recognizes that loading zones for waterfront piers and businesses will be affected. Clear signage and route maps will be developed to direct delivery vehicles to the appropriate locations. Bus and taxi turnaround zones would be accommodated close to the Colman Dock and Aquarium to accommodate passenger drop-off/pick-up. Delivery trucks also could use the turnaround zones as

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C-048-022 along the waterfront during the middle of the work day in March, because that is when no one is there. Those vacant parking spaces provide no potential for mitigating the loss of visitor parking when Waterfront Landings residents need it, however: in the evenings, on weekends, and particularly during the summer. Because the PSRC report gives no indication of what properties were surveyed, we do not know if the Waterfront Landings parking garage was surveyed. If it was, we would expect the Waterfront Landings parking garage to have been largely vacant between 9:30 and 11:30 or 1:30 and 3:30 on a Monday through Thursday, when a majority of the residents are at work. The Waterfront Landings garage is not available to mitigate the Project's removal of on-street parking, however. All parking spots are privately and legally owned as part of each owner's condominium unit. In addition, the security of the parking garage is integral to the security of the building as a whole and the safety of its residents. Providing public access to the garage is not an option, and the Waterfront Landings owners and Board of Directors will not and cannot permit it.

SEAWALL RECONSTRUCTION

C-048-023 We understand that reconstruction of the seawall north of the Aquarium is likely to be "Phase II" of the Project, and put on hold until additional funding is secured. Waterfront Landings urges the City to use that hiatus to re-think its approach to the seawall entirely.

We recognize that it has been, or should have been, clear since the mid-1950s that the design of the seawall was flawed, allowing gribbles to damage the relieving platform. In a presentation to Waterfront property owners, however, the City made it clear that it is vigorously monitoring the seawall, and it is not moving. Maintenance is costing the City roughly \$200,000 per year, and the Nisqually earthquake required \$2 million in repairs of the settlement of the loose fill behind the seawall. The Project appears to have budgeted more than \$350 million to replace the seawall north of Pike Street. Putting aside for the moment the disruption that the current design for the north seawall replacement will cause, it clearly is not appropriate to spend \$350 million to avoid a \$200,000 per year maintenance expense with periodic \$2 million infusions.

C-048-024 We also recognize that there is another component to the seawall replacement, which is to increase its seismic performance. While that is undoubtedly a valid objective, it must be pursued with judgment and common sense. We understand that Project staff decided that all Project construction would be to a 2500-year earthquake standard. No current codes require that standard. Current building codes, by contrast, require buildings to be designed to avoid loss of life in a 500-year earthquake, although the building may not be habitable once people have escaped from it. We do not know what alternatives may be foreclosed by the Project's 2500-year standard for the seawall reconstruction but might be available with a 500-year standard. As currently proposed, the reconstruction of the northern seawall will be nearly as disruptive to

needed. Detailed access plans will be developed for the central and north waterfront as the project progresses.

C-048-020

Parking at the triangular lot south of the Waterfront Landings would be impacted by the project. Mitigation strategies are aimed at reducing the demand for parking and accommodating short-term parkers. Visitor parking for the Waterfront Landings is not specifically being addressed by the project. If there are visitors who need to be accommodated with parking spaces close to the Waterfront Landings, they would likely be best served by using existing parking spaces in the Waterfront Landings garage. Please refer to the Final EIS Appendix C, Transportation Discipline Report, for additional information on overall parking mitigation strategies.

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront

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C-048-024 properties along Alaskan Way North as failure of the seawall would likely be. In light of that, the City must develop alternatives for the seawall reconstruction that can feasibly attain or approximate the benefits of the Project's proposed approach but at lower environmental cost. If there are alternative approaches that would be less disruptive but would not achieve the 2500-year standard, then those trade-offs must be disclosed in the EIS so that a reasoned decision can be made.⁶ It is not appropriate for alternatives to be foreclosed by arbitrary staff decisions, which should instead be the subject of public decision-making based on full information.

Once the alternatives for replacement of the north seawall are determined, the EIS must disclose the noise, vibration and access impacts of those alternatives and identify mitigation for those impacts.

EMERGENCY SERVICES

C-048-025 The DSEIS states at 101: "Roadway restrictions and closures of SR 99 would cause increased traffic delays and congestion on roads both in and near the Project area, potentially increasing response times for emergency services like police, fire crews, and medical aid." The proposed restriction and then closure of Alaskan Way south of Pike Street would potentially cut off access for or delay emergency medical and fire response from Fire Station No. 5. With the only route from Waterfront Landings to a hospital during construction being along Alaskan Way to the north, either a train or congestion at the cruise ship terminal could add 20 minutes or more to the time it takes to reach a hospital from Waterfront Landings. The EIS must disclose how the Project will prevent degradation of emergency services to Waterfront Landings and other locations along Alaskan Way North.

UTILITIES

C-048-026 The Project will be relocating all the major utilities serving Waterfront Landings at least twice. The EIS should disclose the Project's backup plans should that process result in utility service being cut, as happened with Waterfront Landings' gas service during construction of the Marriott Hotel.

C-048-027 ⁶ We would note that the Seattle Art Museum recently replaced about 1,000 feet of the seawall for approximately \$1.5 million, with essentially no disruption to anyone. We have no idea what, if any, seismic standards the Museum's approach may meet. Nor do we suggest their approach would be appropriate elsewhere. But it illustrates the possibility that there may be far less disruptive approaches than the single alternative provided in the EIS. With the north seawall replacement disconnected from the viaduct replacement, there is no reason why the current plan must be arbitrarily driven forward.

- piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide frequent parking updates
- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

C-048-021

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

C-048-022

The project does not intend to pursue use of any parking spaces in the Waterfront Landings garage. The strategy to increase utilization of existing parking garage spaces would be most suited to garages that currently offer public parking and want to attract more customers through marketing, signage, and an electronic parking guidance system.

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STRUCTURAL DAMAGE

C-048-028 | The project will be doing major construction activities immediately adjacent to Waterfront Landings' rear wall. It will also be causing vibration that may exceed the threshold for structural damage. The EIS should disclose what recourse adjacent property owners have if their buildings are damaged by construction activity.

ECONOMIC IMPACT

C-048-029 | The DSEIS claims that construction "will be tough" for businesses located near the construction area. DSEIS at 99. It claims construction will benefit the economy of the region as a whole through the addition of \$67 to \$112 million per year in construction wages. DSEIS at 100. It does not disclose the potentially devastating impact over as much as a 10 year period on the value of residences such as Waterfront Landings that abut the Project. If, as seems likely from what is disclosed in the EIS, at least some of the units in Waterfront landings are rendered uninhabitable during construction, the market value of those units will be severely impacted, as the only potential buyers will be speculators hoping the value will rise once construction is completed. Most Waterfront Landings residents, like most people generally, are not in a financial position to have two homes for the duration of construction – a home somewhere else that is habitable and the Waterfront Landings unit to move back to when construction is completed. The Residential Mitigation Plan which the DSEIS promises, at 104, must include a mechanism that allows residents to sell their units for fair market value as if the Project had not occurred.⁷

A REVISED DRAFT EIS IS REQUIRED

C-048-030 | Reasonable minds might very well differ as to whether NEPA and SEPA lead to efficient decision making, but that debate has no place here. They are the law. They require that the draft

⁷ Whatever may be the case for properties now east of the viaduct, Waterfront Landings does not expect any significant benefit to its property values from completion of construction. The market currently recognizes the amenity value of its location, and the viaduct does not significantly detract from the value of its units. Their value will continue to be limited by their size, views and quality of finishes after construction is completed. Thus for Waterfront Landings residents the Project offers a decade of severe disruption and loss of habitability, with at most marginal benefit at the conclusion of construction. There is no legitimate argument that residents of Waterfront Landings should be expected to "tough it out" for a decade of hell because of some benefit they will reap at the end of the process.

C-048-023

The seawall is part of the Cut-and-Cover Tunnel and Elevated Structure Alternatives but is a separate project led by the City of Seattle under the Bored Tunnel Alternative. The decision to replace the seawall is not based on the desire to avoid regular maintenance costs and periodic capital repairs. The maintenance and repairs are the minimum needed to keep the seawall functioning, though the seawall is already past its design life. Test probing indicated 37 percent of the seawall had timber relieving platform damage. This maintenance work will increase in frequency and expense as the seawall continues to age. Typical marine structures built in the 1930s were designed to last up to 50 years. The seawall is over 70 years old. An expanded monitoring program is essential to better predicting seawall movement increases, which are our best means of advance warning of a failure.

The new seawall design, whether included as part of the Alaskan Way Viaduct Replacement Project or as a separate project, will meet current seismic design criteria that the existing seawall does not meet. Analysis of the existing seawall indicates it will not withstand a large earthquake, even if it were in like-new condition. Planning for the needed replacement is the prudent and fiscally responsible approach.

C-048-024

Please note that the preferred Bored Tunnel Alternative would not include constructing a new seawall. For the Elevated Structure Alternative, the seawall along the waterfront would support the ground surrounding the footings of an elevated structure alternative, so they are being designed to the same earthquake standard as the elevated structure. It bears pointing out that the difference between a 500-year and 2,500-year earthquake in terms of load on a structure is in the range of 10 to 20 percent. This is generally not sufficient to preclude an alternative, nor would there be any appreciable difference in terms of the construction impacts. The project has evolved since the 2006

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C-048-030

EIS provide a far more disciplined and detailed disclosure of the impacts of the project than is provided here, that it describe the mitigation that will be provided in enough detail so that the effect of the mitigation can be understood, and that the significant adverse impacts that cannot be mitigated be clearly disclosed. If those adverse impacts are sufficiently serious they may require that alternatives that could feasibly attain or approximate the proposal's objectives but at lower environmental cost be fully explored. All of that must be accomplished before there is any irretrievable commitment of resources.

40 CFR § 1502.9 provides:

The draft statement must fulfill and satisfy to the fullest extent possible the requirements established for final statements in section 102(2)(C) of the Act. If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.

Here at a minimum, a revised draft is required that adequately describes the noise, light and glare and vibration impacts on residences abutting the Project, which discloses the mitigation that will be provided for all of the impacts discussed above, with enough detail and analysis to allow the public and decision makers to evaluate the likely effectiveness of that mitigation, and which clearly identifies the significant adverse impacts that cannot be mitigated. It may also require the development of alternatives that may attain or approximate the objectives of the Project at lower environmental cost.

Sincerely,

GRAHAM & DUNN PC

Elaine L. Spencer

EIS/log

cc: Waterfront Landings Board of Directors
m35039-760765.doc

Supplemental Draft EIS, so please see the Final EIS for current information about the proposed build alternatives.

C-048-025

As discussed in the Supplemental Draft EIS Appendix O, the Public Services and Utilities Technical Memorandum, the City of Seattle standard for emergency response time is four minutes.

The lead agencies will continue coordination with the City of Seattle and Port of Seattle police and fire departments, regional transportation agencies, and other related agencies during the final design of the selected alternative. The objectives of this coordination are to provide reliable emergency access and alternative plans or routes to avoid delays in response times, and to ensure that general emergency management services are not compromised. Early notice of detours and lane restrictions will be provided to emergency and nonemergency public service providers.

C-048-026

Please see the Final EIS for current information on utility relocations for the Bored Tunnel Alternative, which is the preferred alternative, as well as for the other proposed build alternatives analyzed in the document. In general, construction contractors are responsible for maintaining services during construction. If utility service is inadvertently disrupted during construction, emergency repairs will be performed in accordance with the requirements of the utility provider.

C-048-027

Comment noted. Current standards for the design of major construction projects such as the Alaskan Way Viaduct Replacement Project require that no collapse should occur under what are termed "rare earthquakes" (those with a 2,500-year return period). The amount of disruption due to

the construction activity could be reduced by staging the work so that one section is done at a time before moving on to the next one.

With the preferred Bored Tunnel Alternative, the seawall would be replaced under a separate project led by the City of Seattle.

C-048-028

It is highly unlikely that vibration resulting from work in the immediate vicinity of the Waterfront Landings Condominiums will cause structure damage to the condos. The project will, however, monitor vibration at adjacent structures along the alignment, including Waterfront Landings. In the unlikely event that vibration impacts from the project result in damage to the condominium complex, the costs of repairs will be borne by the project.

C-048-029

Construction activities, especially along the central waterfront and to a lesser extent the north waterfront, would affect businesses and properties adjacent to the project on either side of the right-of-way. The project team met numerous times with the businesses and property owners in the central and north waterfront to prepare them for the upcoming construction and to solicit input on a variety of mitigation strategies. These mitigation strategies are presented in the Final EIS, Chapter 8, as well as Appendix L, Economics Discipline Report.

If provisions of the Uniform Relocation Act are met, then relocation assistance would be provided. The project will not compensate any property owner for reduced property values except where the project has determined that adequate access cannot be maintained. The project will not guarantee sale at fair market value.

C-048-030

The information provided by the 2006 Supplemental Draft EIS (main volumes and appendices) does meet NEPA and SEPA requirements for disclosing potential impacts and mitigation measures. The level of detail requested by this letter is not necessary to understand the effects of the project and how they might be mitigated. Such a detailed description would inaccurately convey an ability to precisely predict how large and very complex projects are built. Instead, greater detail would mislead the reader and provide grounds for future claims against the project. Further, the public and nearby residents, businesses, and property owners (including this commenter) have been directly involved in a meaningful way in developing mitigation measures and programs for this project. In addition, analysis for the Bored Tunnel Alternative was presented in the 2010 Supplemental Draft EIS. Please see the Final EIS for the current information on effects and mitigation.



August 28, 2006

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Jane Garvey, Chair
Expert Review Panel
C/O WSDOT
999 Third Avenue, Suite 2424
Seattle, WA 98104

Attn: Barbara Gilliland, ERP Administrator

RE: Chamber support of a cut-and-cover tunnel and study of construction impacts

Dear Chair Garvey:

C-049-001

As representatives of the Seattle and Puget Sound business communities, we believe that the Alaskan Way Viaduct and Seawall Replacement Project is the single most important transportation project in the State of Washington. Only the SR-520 Bridge approaches the viaduct in the danger it poses to the safety of the Central Puget Sound region's residents and the health of our state's economy. Therefore, replacing the viaduct in a timely manner remains the top transportation priority of the Greater Seattle Chamber of Commerce.

C-049-002

Chamber Prefers Cut-and-Cover Tunnel Alternative

Consistent with our May 2004 position, the Greater Seattle Chamber of Commerce supports replacing the Alaskan Way Viaduct with the preferred cut-and-cover tunnel alternative, as outlined in the SDEIS.

We fully understand and appreciate that the tunnel alternative's benefits are numerous. Initial 2004 data from Berk and Associates indicated that over a billion dollars of new activity would be created in the City. Recent independent economic analysis by Glenn Pascall has concluded that the completed tunnel alternative's potential revenue generation would far exceed the higher cost of the core project. No other alternative offers the same long-term benefits and opportunity to create a truly world class waterfront than does the tunnel.

In addition, the cut-and-cover tunnel option allows a combined replacement of a portion of the seawall with the western wall of the tunnel. This is a considerable cost savings to the project and moreover means the waterfront won't be disrupted twice by major construction activities.

C-049-003

Serious Study of Construction Impacts is Necessary

Irrespective of which alternative is ultimately chosen, questions still remain about the economic impacts of construction and we urge the project team to thoroughly study these costs and provide a plan for support and mitigation of affected businesses and a growing number of downtown residents in the Final EIS.

Perhaps the greatest challenge, regardless of which alternative is chosen, is measuring and planning for the massive construction effort that will be necessary to complete the project. It was originally envisioned in the 2004 DEIS that, in a side-by-side tunnel scenario, two lanes of traffic in each direction could be temporarily placed in the

C-049-001

Thank you for your support of the project and recognition of the urgent need to replace the viaduct.

C-049-002

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2006 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2006, please refer to the Final EIS for current information.

C-049-003

Economic impacts specific to the Central Waterfront properties were identified in Sections 6.1.2, 6.1.3, 6.1.6, and 6.3.2 of the 2006 Supplemental Draft EIS Economics Technical Memorandum. These have been updated in Appendix L, Economics Discipline Report, of the Final EIS. Probable significant adverse impacts are not expected for either the Port of Seattle or the Ballard/Interbay industrial areas with the exception of a decrease in freight mobility and increase in congestion for truck traffic as they use alternative freight routes. The loss of freight mobility will have a resultant loss in productivity, which is discussed in the Economics Discipline Report of the Final EIS as a cost of congestion.

Probable significant adverse impacts for Downtown Seattle would be limited to those properties abutting the construction zone (east and west sides). Significant impacts to the bulk of downtown Seattle will revolve primarily around the increase in congestion as traffic is displaced from the immediate corridor and is absorbed on the surface street network. The increase in congestion will have a resultant loss in productivity, which is discussed in the Economics Discipline Report of the Final EIS



C-049-003

western-most tunnel during construction. Later investigations in the ventilation systems showed that this was not feasible and it appears that construction impacts will be significant.

We understand that the question of how to build any alternative is still open at this point and the project team is considering a range of options with varying amounts of disruption, cost, and time impacts. It is essential that utmost consideration be given to the movement of freight and the flow of commerce, especially during periods of time when the viaduct and Alaskan Way are closed and traffic is at its worst. Waterfront businesses will be especially challenged to maintain operations while the heaviest construction is taking place right at their door steps. The economic stability of the City, the region, and even the state could be jeopardized if the construction and mitigation plans are not well thought through and carefully devised, taking into consideration the needs and concerns of all stakeholders.

Moreover, the Port of Seattle is one of the largest and busiest ports in the United States. The demand to unload and rapidly move cargo throughout the region is essential to the City and the state's continued growth and economic presence regionally and worldwide. The industrial area south of downtown also relies on the use of SR-99 to move goods. Limiting freight travel during or after construction could have serious negative consequences and this issue must be thoughtfully addressed in the Final EIS.

The Chamber supports studying what the construction impacts could be to downtown and what must be done in terms of mitigation and compensation to protect travelers and the economy.

Recently a group of waterfront businesses and cultural institutions have started constructive talks with City of Seattle officials. We applaud this first step towards a specific plan for mitigation to ensure that, after the decade of disruption is over, we still have a vibrant and viable waterfront, a thriving downtown core, and a safe and well-designed transportation artery that serves our entire regional economy.

C-049-004

Finally, the Chamber supports the concept of a Local Improvement District as a fair method to partially fund construction of the cut-and-cover tunnel, however we believe this tax increase should not be collected until after the project is completed and the rise in property values is realized.

Thank you for the opportunity to comment on this important project. The Chamber looks forward to working with you and the project proponents to improve this vital transportation corridor.

Sincerely,

Steve Leahy
President & CEO

James R. Peoples
Chair

Mary O. McWilliams
Incoming Chair

Cc: Governor Christine Gregoire, Mayor Greg Nickels, Deputy Mayor Tim Céis, Seattle City Councilmembers, Secretary of Transportation Doug MacDonald, Expert Review Panelmembers, Alaskan Way Viaduct SDEIS Manager Kate Stenberg

as a cost of congestion.

A primary goal of construction planning is to maintain adequate access to all businesses so they can continue to operate. As construction phasing and staging is refined throughout the design process, it may be determined that it is neither reasonable nor feasible to maintain access to some businesses. If adequate access cannot be maintained, impacts to affected businesses will be mitigated as discussed in Chapter 8 of the Final EIS. If provisions of the Uniform Relocation Act are met, then relocation assistance would be provided.

Construction activities, especially along the central waterfront and, to a lesser extent the north waterfront, would interfere with access to businesses and properties adjacent to the project on either side of the right-of-way. The project team has met numerous times with the businesses and property owners in the central and north waterfront to prepare them for the upcoming construction and to solicit input on a variety of mitigation strategies (see Chapter 8 of the Final EIS). We anticipate close coordination with nearby businesses and property owners continuing through the rest of the design process and all stages of construction.

C-049-004

A local improvement district is not being considered as part of the proposed funding plan for replacing the viaduct; however, the City of Seattle may consider one as part of the Central Waterfront Project.

From: [Charles Knutson](#)
To: [richard.conlin@seattle.gov](#); [richard.mciver@seattle.gov](#); [david.della@seattle.gov](#); [tom.rasmussen@seattle.gov](#); [jean.godden@seattle.gov](#); [nick.licata@seattle.gov](#); [peter.steinbrueck@seattle.gov](#); [jan.drago@seattle.gov](#); [sally.clark@seattle.gov](#);
CC: [governor.gregoire@governor.wa.gov](#); UCO Expert Review Panel; Steve Leahy; [mmcwilliams@regence.com](#); [greg.nickels@seattle.gov](#); [tim.ceis@seattle.gov](#); MacDonald, Doug; [Kate Joncas](#); [grace.crunican@ci.seattle.wa.us](#);
Subject: Seattle Chamber supports tunnel ordinance
Date: Friday, September 22, 2006 9:09:24 AM
Attachments:

Dear Seattle City Councilmember:

C-050-001 The Greater Seattle Chamber of Commerce would like to reiterate its support for the Cut and Cover Tunnel to replace the Alaskan Way Viaduct.

The new cost estimates WSDOT released this week only reinforces the need for decisive leadership. The longer we wait the more expensive it's going to get. And as the Governor's expert review panel said, the biggest risk to this project is political indecision. The time is now. We must make a decision on how to move forward with the Viaduct replacement.

We look forward to working with you, WSDOT and SDOT to build the economic case and financing plan for this preferred alternative. Only through rigorous analysis and collaborative planning will we come up with a proposal that meets the test of the public in the year ahead.

We ask that you vote today to support an ordinance that would declare a tunnel the preferred alternative of the City of Seattle.

Sincerely,

Steve Leahy
President and CEO
Greater Seattle Chamber of Commerce

C-050-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2006 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2006, please refer to the Final EIS for current information.

September 21, 2006

Dear Ms. Kate Stenberg,

Thank you for the opportunity to contribute to this important decision for Seattle's future through responding to the Alaskan Way Viaduct and Seawall Replacement supplemental draft EIS.

C-051-001

We at the People's Waterfront Coalition urge you to include a range of lower-cost and more environmentally friendly choices in the supplemental draft EIS. The purpose of the AWW / Seawall replacement project as initially defined was to "provide a transportation facility and seawall with improved earthquake resistance that maintains or improves mobility and accessibility for people and goods along the existing Alaskan Way Viaduct Corridor."

The purpose and need statement does not refer to a specific number of vehicles or passengers but to the overall transportation functions in the corridor. It seems the phrase "maintains or improves mobility and accessibility" was deliberately chosen so as to allow consideration of a broad range of facility types and mix of modes among the alternatives.

C-051-002

We urge you to look more broadly at a range of possible options to provide mobility to people and freight, from a smaller tunnel to a Transit + Streets proposal that invests in transit and enhancing the surface street network instead of a new highway segment. We urge you to creatively consider all the various types of capacity that may be employed to provide mobility in this corridor – on city streets, new light rail, new bus rapid transit, pedestrian ferries, new streetcars, and increased service on existing transit.

The arbitrary limitation imposed by the legislature on maintaining vehicle capacity on a single facility is itself causing serious problems:

- o the project costs are too high relative to funding available
- o extended megaproject construction imposes too much hardship on existing businesses in one of Seattle's main economic centers
- o encouraging auto usage with more car capacity instead of mode shift runs counter to our shared commitment to reduce carbon emissions
- o pouring millions of tons of concrete along the shoreline is detrimental to the marine ecology of Elliott Bay, however you try to mitigate it.

Because of these shortcomings, we believe neither the two alternatives carried forward in the draft EIS as preferred alternatives serve the mobility function in an environmentally and fiscally responsible way.

C-051-003

Second, we also urge you to broaden the range of measures used to calculate economic impacts of this decision. There is enough attention paid to initial capital costs and the cost of congestion, but these measures are insignificant relative to the long-term effects on Seattle's economic viability. Given its economic and civic potential, this is perhaps Seattle's most

C-051-001

FHWA, WSDOT, and the City of Seattle agree (although "traffic safety" was omitted in your quote of the purpose statement). The project's purpose is fundamental for all alternatives. The Surface and Bypass Tunnel Alternatives were eliminated, and a no-replacement alternative is not acceptable, because they do not fulfill the purpose of the project.

C-051-002

The lead agencies appreciate receiving your comments and recognize your concerns related to costs, transit, and potential construction effects to businesses and natural resources. The Final EIS Chapter 2, Alternatives Development, describes the history of the project, which included screening 76 viaduct replacement concepts and seven seawall concepts which were packaged into the five build alternatives evaluated in the 2004 Draft EIS. This chapter also addresses development of the I-5, Surface, and Transit Hybrid. After the purpose and need statement was updated in 2009, design concepts were reevaluated and screened to determine the alternatives to be evaluated in the 2010 Supplemental Draft EIS. The Surface and Transit Hybrid concept was screened out because the lead agencies determined it lacked the capacity to serve the long-term needs of the region and it does not meet the project's purpose and need to provide capacity to and through downtown Seattle.

C-051-003

The economic analysis in the Final EIS accounts for those impacts and benefits that are under the direct control of the project. Indirect and secondary impacts and benefits are identified as they can be reasonably tied to a general project activity. Expanding the analysis to address the economic vitality of the City of Seattle would be speculative and any conclusions that would be drawn would be subject to forces beyond the control of this project.

C-051-003

important and valuable public land. It is necessary to compare how the various options for this infrastructure investment measure up against future goals as defined by Seattle's Comprehensive Plan: sustaining a robust economy, supporting compact development, reducing car dependence, offering high quality of life and urban amenities for residential growth, and continuing to attract and retain employers. We recommend you measure these effects for the range of options:

- o Expected development potential and real estate value
- o Tax revenue generated for the City (sales, business, and property taxes), including when revenue capture begins
- o The viability of existing business to stay afloat and building occupancy rates during expected construction duration
- o The future transportation cost burden per household
- o The quality of life impacts of reclaiming the waterfront for other uses, and its effect on the health of the tourist trade, ability to attract employers, etc.
- o The number of expected car trips and collective emissions produced

For City and State leaders to make an informed decision, the range of lower-cost choices should be expanded and a broader set of economic and environmental measures should be assessed.

Thank you.

Cary Moon
Director, People's Waterfront Coalition
206.624.1061

The purpose and need of this project are not defined as meeting the goals of Seattle's Comprehensive Plan. Appendix G, Land Use Discipline Report, of the Final EIS evaluated how the project would comply with the Seattle Comprehensive Plan's goals. However, the project is limited in its regional economic effect--replacing an existing road with a new road that maintains or improves mobility and accessibility--after construction is completed.

Some of the indirect economic impacts and benefits that are requested to be analyzed are beyond the control of the project, including expected development potential and real estate value, the future transportation cost burden per household, and the quality of life impacts. The economic analysis addressed City of Seattle and King County revenue generated/lost by the project (parking meters, property tax base, and sales tax) that can be tied to elements under the direct control of the project. The economic analysis also addressed the impacts to businesses during construction, especially to those businesses in business districts of special concern (Central Waterfront and Pioneer Square); however, the analysis did not analyze whether a particular business would thrive, fail, or just survive, as the performance of an individual business is beyond the control of the project.

Appendix M, Air Quality Discipline Report, of the Final EIS analyzed vehicle trips and their emissions.



September 21, 2006

Kate Stenberg
 WSDOT, Environmental Manager
 Alaskan Way Viaduct and Seawall Replacement Project
 999 Third Ave, Suite 2424
 Seattle, WA 98104

Dear Ms. Stenberg:

The Ballard District Council has reviewed the Alaska Way Viaduct Replacement DEIS and SEIS and has found deficiencies in the analysis. We request that these deficiencies be addressed in the FEIS.

We believe that the DEIS and SEIS are remiss in addressing the following areas:

- C-052-001** | 1. Direct construction impacts uniquely on Ballard's businesses and residents are not adequately evaluated for either alternative. These impacts include freight movement, business trips, commute trips, airport trips, and medical trips. The direct impacts on those trips that currently use SR-99 are not discussed.
- C-052-002** | 2. Indirect construction impacts on Ballard's businesses and residents are not addressed for either alternative. The closing of SR99 and the Alaskan Way surface street will cause congestion throughout the region. No reasonable alternative routes have been provided. I-5 cannot handle more congestion. How will workers and supplies get to Ballard businesses?
- C-052-003** | 3. What are the economic impacts of traffic delays caused by construction? This is a NEPA document and economic impacts should be quantified, not discussed in generalities. The EIS does not adequately discuss the economic impacts from the travel delays caused by the direct and indirect construction impacts of either alternative. The job losses in the Ballard area could be significant as the raising cost of finding employees could be prohibitive, cost of shipments increase, businesses moving to areas without delays, etc.
- C-052-004** | 4. The effect on air quality from construction gridlock and detours are not adequately discussed for either alternative.
- C-052-005** | 5. The impacts of a 7% grade associated with the tunnel option were not adequately discussed in either EIS. The 7% grade in the proposed tunnel configuration will slow the movement of traffic north on SR-99, particularly truck traffic.

Member Organizations

Ballard Chamber of Commerce Society • Ballard High School PTSA • Ballard Historical Society • Ballard Merchants Association • Ballard Northwest Senior Center • Crown Hill Business Association
 • East Ballard Community Association • Friends of Burke Gilman Trail • Groundswell NW • Loyal Heights Community Center • Loyal Heights Community Council • Nordic Heritage Museum
 • North Beach Elementary PTA • North Seattle Industrial Association • Norwegian Commercial Club • Olympic Manor Community Club • Seaview Neighborhood Association • Shilshole Liveaboard
 Association • Sunset Hill Community Association • Sunset West Condominium Association • Whitler Heights Community Council • 36th District Demos • 36th District Green Party • 36th District Republicans

C-052-001

Thank you for your comment. Further analysis of the traffic effects during construction has been conducted and is presented in Chapter 6 of Final EIS Appendix C, Transportation Discipline Report. This chapter provides a number of transportation metrics such as travel time for various routes, intersection operations, SR 99 mainline operations, and system-wide performance measures for each alternative. Also included in the chapter are discussions of the construction effects of each alternative on trucking and freight traffic.

C-052-002

Further analysis of the traffic effects during construction has been conducted and is included in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report. Please refer to this chapter for more current information.

C-052-003

Probable significant adverse construction impacts are not expected for either the Port of Seattle or the Ballard/Interbay industrial areas with the exception of a decrease in freight mobility/increase in congestion for truck traffic as they use alternative freight routes. The loss of freight mobility will have a resultant loss in productivity, which is discussed in Appendix L, Economics Discipline Report, of the Final EIS as a cost of congestion.

The economic impacts associated with freight mobility were described in Section 6.2.3 of the 2006 Supplemental Draft EIS Economics Technical Memorandum as a result of displacements and have been updated in Appendix L of the Final EIS. Unfortunately, it is not possible to keep the viaduct open during the entire construction period. With the exception of mitigation measures presented in the Final EIS and Appendix C, Transportation Discipline Report, that are specific to the movement of freight, there is little that the project can do to mitigate impacts to

C-052-006

6. The EIS does not adequately discuss the impact to flammable and hazardous materials transport through the corridor, during and after construction for either of the alternatives. The impacts could force Ballard businesses to close.

C-052-007

7. View Blockage. Seattle residents and visitors enjoy views of the Olympics, City and the waterfront from the current elevated structure. Under the tunnel alternative they will be removed. The EIS suggests that the removal of the elevated structure will increase the views for the general public. This reflects faulty analysis inasmuch as there are many structures blocking the views which will not be removed. Some views may be increased for inhabitants of buildings that currently exist or may be built along Western Avenue, but the number of people that would receive benefit from the demolition of the elevated structure is very small compared to the number that benefit from the views from the elevated structure on a daily basis.

C-052-008

8. The Seattle Monorail program was presented in the draft EIS as a form of mitigation to traffic impacts. The Monorail is not going to be constructed; this changed condition was not addressed in the SEIS and should be addressed in the FEIS.

The Ballard District Council appreciates the opportunity to provide comment on the EIS and looks forward to seeing your responses.

Respectfully,



Mary Hurley
President

businesses that are not located in the immediate construction corridor but rely on the existing roadway network to maintain a thriving business.

C-052-004

Air quality effects during construction would occur primarily as a result of dust and emissions from construction equipment (such as bulldozers, backhoes, and cranes), diesel-fueled trucks, diesel-and gasoline-fueled generators, and other project related vehicles such as service trucks. Potential air quality impacts during the construction period have been estimated and are discussed in Appendix M, Air Discipline Report. Please refer to the Final EIS for current information.

C-052-005

The Bored Tunnel grades would not exceed 4 percent and should have only a marginal effect on truck speeds. The Cut-and-Cover Tunnel south of Battery Street Tunnel south portal would have grades of 6.5 percent (steepest grade), but this section is about 800 feet long.

C-052-006

At this time, transporting hazardous materials in the Battery Street Tunnel is prohibited. The Final EIS notes that hazardous and flammable cargo would be prohibited in the Bored Tunnel as well. Currently, hazardous/flammable materials can be transported on downtown city streets without restriction, as long as the trucks do not exceed 30 feet in length. Vehicles exceeding 30 feet in length carrying hazardous or flammable materials wishing to travel through downtown Seattle would continue to use I-5 or Alaskan Way. This practice is not expected to change as a result of Alaskan Way Viaduct Replacement Project construction activities.

C-052-007

Many people have expressed that they enjoy the views when traveling on the viaduct. The visual character and quality of the views, as well as the likely viewer response of drivers and passengers are discussed in Appendix D, Visual Quality Discipline Report. The analysis considers the SR 99 corridor, which is designated as a City of Seattle Scenic Route, and identifies and assesses other designated view corridors primarily along east-west streets. Views from the roadway and of the roadway are both assessed.

C-052-008

As correctly stated, the Seattle Monorail Project's Green Line is no longer being considered for implementation, and therefore cannot be assumed as a mitigation strategy to either complement or replace the project. However, other high-capacity transit developments that are currently being planned or implemented (e.g., RapidRide, Link light rail) would address many of the trips that are made on a daily basis through the Alaskan Way Viaduct corridor. The transportation analysis described in the Supplemental Draft EISs and Final EIS (including Appendix C, Transportation Discipline Report) was conducted assuming this changed condition.



ALLIED ARTS
OF SEATTLE

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Seattle, Washington 98104
aarts@speakeasy.net
(206) 624-0433

AWV Project Office
999 Third Avenue, Suite 2424
Seattle, Washington 98104

awvsdeiscomments@wsdot.wa.gov

September 22, 2006

To whom it may concern:

Allied Arts commends WSDOT, the City of Seattle and the Federal Highway Administration for their initial work to analyze the environmental impacts regarding changes to the downtown Seattle waterfront, as well as to guide the process our region is taking toward redevelopment of this neighborhood. We also consider the Supplemental EIS and associated comments to be just one step in a series of necessary input opportunities and collective decisions.

c-053-001 | Our position regarding the Alaskan Way corridor is that all through-Seattle traffic should travel underground from Atlantic Street to Roy Street and that Alaskan Way should receive no net gain in width or roadway. (Though technically Alaskan Way includes the area below the viaduct, our definition refers to the three to four lane arterial.)

c-053-002 | We ask that as you further study the opportunities for the waterfront that you also analyze and address the following considerations:

At Grade Mercer

In January of 2005 the Seattle City Council and the Mayor of Seattle signed a resolution, agreeing that Aurora should travel below Mercer, Harrison and Republican Streets:

C-053-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2006 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2006, please refer to the Final EIS for current information.

C-053-002

The concept of enhancing neighborhood connections across Aurora Avenue has continued to be among the improvements being considered as part of the project. All the build alternatives include new street connections across Aurora Avenue north of the Battery Street Tunnel. For example, for the preferred Bored Tunnel Alternative, Aurora Avenue would be built to grade level between Denny Way and John Street. John, Thomas, and Harrison Streets would be connected as cross streets with signalized intersections on Aurora Avenue at Denny Way and John, Thomas, and Harrison Streets. See the Final EIS for the current configuration of all the proposed build alternatives.

- C-053-002** | *Reconstruct Aurora at a lower grade with local streets crossing above:*
- * Construct Mercer, Republican and Harrison Streets to cross SR99 at the surrounding street grade;*
- WSDOT also sanctioned this decision. Allied Arts believes that maintaining this decision is vital to the health of the adjacent neighborhoods, as well as the Alaskan Way Viaduct and Mercer Street replacement projects.
- Strong neighborhood connections among South Lake Union, Uptown and Belltown/Waterfront must be created, especially for pedestrians.
- C-053-003** | **North Lid**
A lid should be constructed above the highway from Pike Street to the Battery Street Tunnel and across the entire width of the gulch that is created by the highway. To that end, Allied Arts supports the plan to have the highway travel under Elliott and Western Avenues.
- C-053-004** | **Southern Tunnel Portal**
Analysis should be given toward moving the southern portal to the tunnel to a point south of Atlantic Street.
- C-053-005** | **South Lid**
A lid should be constructed above the highway from King Street, south to Royal Brougham.
- C-053-006** | **No net Increase in Speed on Alaskan Way**
The speed limit on Alaskan Way should be no more than 30 mph. Traffic lights should be set to move traffic between 22 and 28 mph—again, in accordance with other downtown avenues.
- C-053-007** | **No Ferry Queuing on Alaskan Way**
No additional lanes should be constructed on Alaskan Way or any other pedestrian- or traffic-oriented street near the waterfront.
- C-053-008** | **Relocate Trolley**
Analysis should be made of moving Streetcar 99 to Western from Alaskan Way. A Western Avenue streetcar would better link neighborhoods to the waterfront and provide more space for destinations on the waterfront.

C-053-003

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel Alternative and evaluated in the 2006 Supplemental Draft EIS. It was included in the project, due in part to numerous 2004 Draft EIS public comments requesting the lead agencies to consider a lid in the Pike Place/Belltown area. The proposed lid would extend north from where SR 99 emerges from the tunnel's north portal near Pine Street to Victor Steinbrueck Park near Virginia Street. The design for this lid structure with the current Cut-and-Cover Alternative is described in this Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.

C-053-004

The south portal location has been analyzed by the design team. The configuration of the tunnel requires that on- and off-ramps access the tunnel from the tunnel portals. Moving the tunnel portal south would force the on- and off-ramps into the existing railyards. This cannot be done given the current rail operations and rail traffic.

C-053-005

At this time, a lid over SR 99 from King Street to S. Royal Brougham Way is not proposed as it would not increase pedestrian access between areas of pedestrian activity. The addition of a lid would essentially extend the tunnel and would require similar support facilities for ventilation, fire suppression, and emergency egress. This structure would have similar costs per linear foot as the tunnel. In addition, because the area in question is bordered on the west by the Port of Seattle, an industrial facility, a pedestrian lid would not link the stadium areas to a public waterfront destination.

c-053-009

One Great Downtown Park

Analysis should be made of identifying a space for a large, center city park, located south of Pike. Consideration should be given to acquisition of the surface parking lot between Spring and Seneca, Western and Alaskan, as a potential highway construction site and subsequent park.

c-053-010

Conclusion

In conclusion, we recognize that the major landowners along the waterfront are each public entities, holding the land in the public trust. We call upon WSDOT, the City of Seattle, the Port of Seattle and the Department of Natural Resources to work cooperatively, as well as to value and consider the quality of life aspects of our new waterfront that are otherwise out of their stated missions.

Sincerely,

Laine Ross
President

Sally Bagshaw
Waterfront Committee Chair

C-053-006

The speed limit along the Alaskan Way surface street is currently 30 mph, the standard speed limit for arterial streets in the City of Seattle. The Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure Alternatives, the build alternatives carried forward to the Final EIS, do not propose to change the speed limit along the Alaskan Way surface street. Traffic signals on Alaskan Way for the Cut-and-Cover Tunnel and Elevated Structure Alternatives would be designed to help facilitate safe and efficient traffic flow along the corridor. The Bored Tunnel Alternative does not include the Alaskan Way surface street as part of the project.

C-053-007

With the Cut-and-Cover Tunnel Alternative, the southbound on-ramp at Columbia Street and the northbound off-ramp at Seneca Street will be removed. Traffic patterns are expected to alter slightly with removal of these ramps, and the Alaskan Way surface street is expected to carry additional traffic to and from the central business district. To provide similar capacity levels as currently exists today, six lanes of traffic on the Alaskan Way surface street are necessary south of Yesler Way. With the Elevated Structure Alternative, additional lanes proposed on portions of Alaskan Way are for the purpose of improving traffic circulation and flow, especially in the vicinity of Colman Dock. The Bored Tunnel Alternative does not include the Alaskan Way surface street as part of the project.

C-053-008

Construction of the Olympic Sculpture Park in 2008 led to the indefinite suspension of the George Benson Line Waterfront Streetcar service because it displaced the vehicle storage and maintenance facility. King County Metro currently provides replacement service with fare-free bus service on the Route 99 Waterfront Streetcar Line. The routing and stop locations for this line do not exactly duplicate those of the waterfront streetcar; however, Route 99 serves the same neighborhoods—the waterfront, Pioneer Square, and Chinatown/International District. With

the Bored Tunnel Alternative the final location of the streetcar will be determined by the Central Waterfront Project being led by the City of Seattle. Both the Cut-and-Cover Tunnel and the Elevated Structure Alternatives include the streetcar along Alaskan Way.

C-053-009

The Alaskan Way Viaduct Replacement Project does not include specific plans for new park and recreation facilities or specific waterfront amenities, because the purpose of the project is to provide replacement transportation facility. The Final EIS analysis provides decision-makers with information to weigh the range of impacts and opportunities presented by the build alternatives on existing and potential future open space, public access, and park and recreation facilities as one of many factors balanced in making the choice of the preferred alternative. With the Bored Tunnel Alternative, the exact configuration and types of activities on the waterfront will be decided by the Central Waterfront Project, led by the City of Seattle. There will be many opportunities for the public to participate in that master planning effort and to determine the future of their waterfront.

C-053-010

FHWA, WSDOT and the City of Seattle have made every effort to assess and avoid or minimize environmental impacts from the project. In addition, these lead agencies are working cooperatively with other agencies, such as the Port of Seattle and Department of Natural Resources.



September 22, 2006

Ms. Kate Stenberg
Alaskan Way Viaduct and Seawall Replacement Project
999 Third Avenue, Suite 2424
Seattle, WA 98104

Re: Alaskan Way Viaduct and Seawall Project - Supplemental Draft EIS

Dear Ms. Stenberg:

The Ballard Interbay Northend Manufacturing Industrial Center (BINMIC) appreciates the opportunity to comment on the Supplemental Draft EIS (SDEIS) for the Alaskan Way Viaduct Seawall Project.

- C-054-001** | Shutting down of SR-99 for a period of years with the resultant increased cost of shipping will have much greater impacts on Seattle's industrial and manufacturing businesses than the SDEIS has acknowledged. The impacts of the Alternatives considered in the SDEIS cannot be mitigated.
- C-054-002** | The SDEIS fails to adequately acknowledge the interdependence of Seattle's two Manufacturing and Industrial Areas, i.e., the Duwamish and the BINMIC areas, and the extent to which they are dependent on daily shipping of parts between these two areas.
- C-054-003** | The SDEIS does not adequately address the likelihood of the City and perhaps the State losing manufacturing and industrial businesses, and the family wage jobs they provide.
- C-054-004** | Direct construction impacts on BINMIC businesses and residents are not adequately discussed for either alternative. These impacts include freight movement, business trips, commute trips, airport trips, and medical trips. The direct impacts on those trips that currently use SR-99 are not mitigatable.
- C-054-005** | Indirect construction impacts on BINMIC businesses and residents are not adequately discussed for either alternative. The closing of SR99 and the Alaskan Way surface street will cause congestion

C-054-001

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the other two alternatives. Extended closure of SR 99 would be more disruptive to Seattle and the Puget Sound region. Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS provide a more in-depth comparison of trade-offs for the three alternatives.

C-054-002

A detailed discussion of freight generators, freight corridors, and impacts to freight is included in the Final EIS Appendix C, Transportation Discipline Report.

C-054-003

The build alternatives would result in enhanced mobility to activity centers in both the south and north portal areas and beyond, particularly to the SODO commercial and business district and the stadium area. Overall, the infrastructure improvements in the north portal area would improve truck freight mobility and vehicle and pedestrian connections. In turn, these benefits would improve business efficiencies due to the increased circulation near the project area. The build alternatives would contribute to local and regional mobility by providing drivers with an alternative to I-5 and Seattle's surface streets. The benefits of the Elevated Structure Alternative would not be as substantial as those described for the Cut-and-Cover Tunnel Alternative and Bored Tunnel Alternative. A more in-depth discussion of economic effects is provided in Appendix L, Economics Discipline Report. A more in-depth discussion of mobility, including freight, is provided in Appendix C, Transportation Discipline Report.

- C-054-005** | throughout the region. Of particular concern will be the expected 10-14 hours of delay on I-5. These indirect construction impacts are not mitigatable.
- C-054-006** | Increased greenhouse gases and other pollution from construction gridlock and detours are not adequately discussed for either alternative. No reasonable alternative routes have been provided. Idling traffic and gridlock will produce more greenhouse gases than without these construction delays. These impacts are not mitigatable.
- C-054-007** | The SDEIS does not adequately discuss the economic impacts from the delays caused by the direct and indirect construction impacts of either alternative. The job losses in the BINMIC could be significant as the raising cost of finding employees could be prohibitive, cost of shipments increase, businesses leaving to areas without delays, etc. These temporary and permanent impacts are not mitigatable.
- C-054-008** | Traffic impact from 7% grade in tunnel. The impacts of a 7% grade in the tunnel were not adequately discussed. It will impact the movement of traffic north on SR-99, particularly truck traffic. These impacts are not mitigatable.
- C-054-009** | The EIS does not adequately discuss the impact to flammable and hazardous materials transport, during and after construction for either of the alternatives. The impacts could force BINMIC businesses to close. These impacts are not mitigatable.
- C-054-010** | Monorail impacts-for the draft EIS the proposed monorail was discussed in the Draft EIS. The Supplemental EIS does not discuss the impacts of removing the monorail from this analysis.
- C-054-011** | In summation, we find there are many issues where mitigation has not been adequately addressed and it is our understanding that there are no mitigation funds available for businesses that could be adversely impacted by the construction. More analysis must be made of the adverse impacts to operating businesses from construction and the mitigation actions needed to keep them operating.

Thank you.

Regards,



John R. Kane
Chair - BINMIC Committee

C-054-004

Further analysis of the traffic impacts during construction has been conducted and is presented in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report. The chapter provides a number of transportation metrics such as travel time for various routes, intersection operations, SR 99 mainline operations, and system-wide performance measures for each alternative. Also included in the chapter are discussions of the construction effects of each alternative on trucking and freight traffic.

C-054-005

The Final EIS Appendix C, Transportation Discipline Report, addresses impacts on regional facilities, such as I-5 and major east-west corridors used by the freight community, in more detail.

C-054-006

Mitigation measures, presented in Chapter 8 and Appendix C (Transportation Discipline Report) of the Final EIS will be followed to minimize disruptions such as detours and traffic congestion during the project's construction phase. Estimates for the potential direct emissions of greenhouse gases under the build alternatives are provided in the Final EIS and Appendix R, Energy Discipline Report. Potential air quality impacts during the construction period have been estimated and are discussed in Appendix M, Air Discipline Report.

C-054-007

The build alternatives would result in enhanced mobility to activity centers in both the south and north portal areas and beyond, particularly to the SODO commercial and business district and the stadium area. Overall, the infrastructure improvements in the north portal area would improve truck freight mobility and vehicle and pedestrian connections. In turn, these benefits would improve business efficiencies due to the

increased circulation near the project area. The build alternatives would contribute to local and regional mobility by providing drivers with an alternative to I-5 and Seattle's surface streets. The benefits of the Elevated Structure Alternative would not be as substantial as those described for the Cut-and-Cover Tunnel Alternative and Bored Tunnel Alternative.

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the other two alternatives. Extended closure of SR 99 would be more disruptive to Seattle and the Puget Sound region. Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS provide a more in-depth comparison of trade-offs for the three alternatives.

A more in-depth discussion of economic effects is provided in Appendix L, Economics Discipline Report. A more in-depth discussion of mobility, including freight, is provided in Appendix C, Transportation Discipline Report.

C-054-008

The Bored Tunnel grades would not exceed 4 percent and should have only a marginal effect on truck speeds. The Cut-and-Cover Tunnel south of Battery Street Tunnel south portal would have grades of 6.5 percent (steepest grade), but this section is about 800 feet long.

C-054-009

The Final EIS notes that hazardous and flammable cargo would be prohibited in the bored tunnel all day. Currently, hazardous/flammable materials can be transported on downtown city streets without restriction,

as long as the trucks do not exceed 30 feet in length. Vehicles exceeding 30 feet in length carrying hazardous or flammable materials wishing to travel through downtown Seattle will continue to use I-5 or Alaskan Way. This practice is not expected to change as a result of the Alaskan Way Viaduct Replacement Project construction activities.

C-054-010

The Seattle Monorail Project's Green Line is no longer being considered for implementation, and therefore cannot be assumed as a mitigation strategy to either complement or replace the project. However, other high-capacity transit developments that are currently being planned or implemented (e.g., RapidRide, Link Light Rail) would address many of the trips that are made on a daily basis through the Alaskan Way Viaduct corridor. The transportation analysis described in the Supplemental Draft EIS and Final EIS (including Appendix C, Transportation Discipline Report) was conducted assuming this changed condition.

C-054-011

Mitigation measures have been developed and are included in Chapter 8 of the Final EIS. Funds for implementing the mitigation plan are included in the project budget.



September 22, 2006

Kate Stenberg
WSDOT, Environmental Manager
Alaskan Way Viaduct and Seawall Replacement Project
999 Third Ave, Suite 2424
Seattle, WA 98104
Via E-mail: awvsdeiscomments@wsdot.wa.gov

Re: Alaskan Way Viaduct and Seawall Replacement Project - Supplemental Draft Environmental Impact Statement

Dear Ms. Stenberg,

Thank you for the opportunity to comment on the *Alaskan Way Viaduct and Seawall Replacement Project Supplemental Draft Environmental Impact Statement (SEIS)* dated July 2006.

People For Puget Sound is a nonprofit, citizens' organization whose mission is to protect and restore Puget Sound and the Northwest Straits, including a specific goal to protect and restore the 2,000 miles of Puget Sound shoreline by 2015.

People For Puget Sound's overall goal for the viaduct/seawall replacement is the creation of great waterfront for both people and wildlife. We have a number of specific goals that will help make Seattle the first environmentally sensitive urban waterfront in the world:

C-055-001

- *A continuous fish migration corridor along the waterfront for juvenile salmon and other species.* Two to twelve million juvenile salmon exit the Duwamish River annually. Many of them migrate along the waterfront on their way out to the Pacific Ocean. These juvenile fish need shallow water areas, food, resting places and respite from predators. Artificial and natural means of fish passage and habitat should be provided for them.

C-055-002

- *30% habitat for the central waterfront.* In order to provide a minimum amount of habitat in Elliott Bay, which is the estuary of the Duwamish/Green Watershed, we advocate for the construction and restoration of at least 30% habitat in each shoreline segment of the bay.

C-055-003

- *Opportunities for the public to touch, feel, and sense the water.* Areas where people can get down the level of the water, such as beaches, will allow the public to feel connected to Elliott Bay and Puget Sound. In addition, the Seattle Aquarium and others could develop environmental educational experiences at the water's edge at created coves, tidepools, and beaches.

MAIN OFFICE	NORTH SOUND	SOUTH SOUND
911 Western Avenue, Suite 580 Seattle, WA 98104 (206) 382-7007 fax (206) 382-7006 people@pugetsound.org	407 Main Street, Suite 201 Mount Vernon, WA 98273 (360) 336-1931 fax (360) 336-5422 northsound@pugetsound.org	1063 Capitol Way South, Suite 206 Olympia, WA 98501 (360) 754-9177 fax (360) 534-9371 southsound@pugetsound.org

C-055-001

The extensive shoreline modifications along the Seattle waterfront are a result of the historic industrial and commercial activities occurring in the area, and these activities will continue to be the primary uses of the waterfront under all the build alternatives. While the Seattle waterfront is currently highly modified, with limited shallow water habitat and extensive overwater structures, salmon and other species continue to access and utilize the available habitat. In addition, there is extensive shallow water beach habitat around Elliott Bay, providing an array of alternative forage, resting, and protection functions for these species.

If the preferred Bored Tunnel Alternative is selected, replacement of the seawall would occur under a separate project, the Elliott Bay Seawall Project, led by the City of Seattle. If the Elevated Structure Alternative or Cut-and-Cover Tunnel Alternative is selected, the proposed seawall replacement process would occur entirely landward of the existing seawall, resulting in no changes to the existing nearshore habitat.

The project will include some in-water work to provide temporary access during the construction process. Therefore, project biologists and engineers coordinated with the resource agencies and other interested parties to address the fish habitat concerns along the Seattle waterfront, and identify potential mitigation opportunities for specific project impacts. The City of Seattle is currently evaluating the effectiveness of several different habitat enhancement panels, which could be attached to the seawall face to increase and improve aquatic habitat conditions along the waterfront.

C-055-002

The project engineers and biologists have coordinated with the resource agencies and interested parties to identify appropriate mitigation for project-related impacts to aquatic habitat along the central waterfront. We anticipate that this collaboration will result in full and appropriate

C-055-004

- **Clean water and sediment.** It is imperative that Seattle clean up both the water and the sediment/soil in the waterfront area. The nearshore of the central waterfront is now designated as critical habitat for endangered Chinook salmon and bull trout. In addition to habitat, these areas need to be cleaned up so that they can be removed from the state's list of impaired waterbodies (303(d) List).

We previously submitted comments on the project's DEIS. Additional comments based on the SEIS (review of the SEIS and 11 of the appendices) as well as the current Viaduct/Seawall replacement public process follow:

C-055-005

1. **Urgency.** The current viaduct structure is aged and damaged and must be torn down. The city and state need to make a decision quickly for public safety and because delays contribute to larger costs (increasing concrete and steel costs, for examples). The seawall is in bad shape. Further delays will lead to increased costs for *any* of the selected options. We urge that the state and city move quickly to raise funds and finalize plans.

C-055-006

2. **Transit.** Transit projects are critical for the success for the new waterfront. The SEIS does show a *dramatic* increase in plans for transit. This is a huge deficit.

C-055-007

3. **Consideration of other alternatives.** Other transportation solutions such as improving I-5, a bore tunnel, a smaller cut and cover tunnel, and a no replacement option that integrates *traffic* into the downtown grid have been seriously proposed. These options have been discounted by viaduct/seawall project staff without a full vetting through a public process. The lack of full discussion has already caused roadblocks (and thus delay) to the resolution of final choice. In many places these alternatives have been addressed as options that the "project partners decided..." should be rejected. Because the public has not been fully engaged in the process, more delays will likely occur. We urge the project staff to more fully provide opportunities for genuine and full discussion of all options. In addition, the *full* costs and benefits, including long term environmental costs and benefits, should be described.

C-055-008

4. **Seawall replacement.** We object to the basically uniform seawall replacement method that is described in the SEIS. To reach the goal of continuous fish migration corridor and 30% habitat, a more diverse set of options should be described for seawall replacement, including areas where the wall is set back, terraced, and where jetty walls, pocket beaches and larger beaches are incorporated into a more innovative set of solutions.

C-055-009

5. **Stormwater treatment.** Clean water is critical for an environmentally sensitive waterfront. The SEIS does not include a list of proposed BMPs for stormwater treatment and *management*, as we requested in our previous letter. How can we evaluate the adequacy of the DEIS/SEIS without specific proposed actions to review?

mitigation for such project impacts. This mitigation is expected to improve fish habitat conditions in the area, and when combined with other independent restoration projects (completed, in progress or expected to occur in the near future), will help to reach the 30 percent restoration goal for the waterfront segment.

C-055-003

Neither beach creation nor direct contact with the water will likely be part of the project. Note that, if the preferred Bored Tunnel Alternative is selected, the City of Seattle would lead a project to replace the Elliott Bay Seawall.

C-055-004

This project will reduce water quality impacts to Elliott Bay through the proposed stormwater management approach which will treat a portion of the currently untreated stormwater from the project area with water quality BMPs that meet the basic requirements, as defined in the 2005 Ecology Manual. There are no project commitments to remediate contaminated sediment/soil in Elliott Bay; however, contaminated sediment will be removed where necessary to install the new seawall. The contaminated sediment will be disposed of at an approved off-site facility.

C-055-005

The lead agencies fully agree the need for improvements is urgent and are endeavoring to move the project ahead expeditiously.

C-055-006

The construction mitigation measures include funding for some increased bus service in the West Seattle, Ballard/Uptown, and Aurora Avenue corridors during the initial portions of the construction period, as well as a bus travel time monitoring system. This mitigation program will

- C-055-010** | 6. **Overwater coverage.** The SEIS identifies two areas where structures will be created that overhang the water: the new overhanging sidewalk and the Washington Street Boat Landing in the Pier 48 area. These two projects are not replacement (i.e., are grandfathered in) for existing overhangs because these are new projects in new locations. Therefore, we strongly object to these. Overwater coverage, especially in shallow water areas, must be minimized.
- C-055-011** | 7. **Inadequate mitigation.** Updated mitigation measures are provided in the SEIS for many resources such as historical structures and social services but not for Fish, Aquatic Resources and Water Quality. In addition, adequate mitigation is not described for businesses that will be seriously impacted by construction.
- C-055-012** | 8. **Pier 48.** The SEIS describes plans to purchase Pier 48 but offers no evidence that Port of Seattle has *agreed* to the sale. This uncertainty is a serious concern given that much of the proposed plan depends on that purchase.
- C-055-013** | 9. **4(f) resources.** Why was Elliott Bay not listed as 4(f) resource?
- C-055-014** | 10. **Minimally described information.** We would like to see electronic copies of the following reports which ideally would have been included as appendices to this SEIS:
- a. August 2005: SPU's "Drainage and Wastewater Feasibility Study for the Alaskan Way Viaduct/Seawall Final Report"
 - b. 2005: Geotechnical and Environmental Data Report (Shannon and Wilson)
- C-055-015** | 11. **Ultrafine particles.** Recent studies of air pollution near major highways in other areas of the *country* show serious human health problems associated with ultrafine particles. WSDOT should include information and mitigation related to the elevated levels of ultrafine particles associated with this transportation project.
- C-055-016** | 12. **Contaminated groundwater, sediment and soil.** According to previous documents as well as Appendix U of the SEIS, the area proposed for construction is a toxic stew of contaminants. These areas must be thoroughly cleaned up as part of this project. Of particular concern is contaminated groundwater that flows into Elliott Bay. The SEIS does not address how these contaminated groundwater plumes will be addressed so that contaminated flows are stopped and also so that the construction project does not further concentrate/channelize flows and make the problem worse.
- C-055-017** | 13. **Additional documentation.** On page 15, in Appendix R (Fisheries, Wildlife and Habitat Discipline Report), the report states "No new site-specific information identifying *salmon* resources of the project areas has been identified since the Draft EIS was prepared..." There have been, however, a number of studies performed as part of the new Seattle Art Museum Sculpture Garden project and these should have been included and described.

also include information about travel alternatives and incentives to encourage use of transit, carpool, and vanpool programs. Refer to Chapter 8 Mitigation of the Final EIS for more information.

C-055-007

All of the alternatives suggested by this comment, and many others, have been considered during the course of project development. We respectfully disagree that the public has not been engaged or given the opportunity to understand and discuss these choices. There have been literally hundreds of presentations to community groups and dozens of public meetings where information has been freely shared and choices openly discussed. Further discussion of alternatives that have already been carefully considered would cause project delay. As stated above in paragraph one of your letter (C-055-005), the project is addressing an urgent need and delay will only increase costs and possible failure in a seismic event.

C-055-008

For the preferred Bored Tunnel Alternative, the seawall would be replaced under a separate project, the Elliott Bay Seawall Project, led by the City of Seattle. For the Elevated Structure Alternative and Cut-and-Cover Tunnel Alternative, it would be necessary to replace the seawall in approximately its current location because of the physical space constraints due to both the transportation functions and the existing underground utilities in the corridor. In the central waterfront, even with a wide right-of-way, the combined width of the tunnel and corridors for the extensive utility infrastructure do not afford any substantive left-over space. On the north waterfront, where the right-of-way is narrower, the surface transportation uses, which include a streetcar, wide sidewalks, bike paths, four lanes of traffic, and parking, leave no extra space to allow for setting back the seawall.

There are other projects planned for the waterfront, and the City is

C-055-018

Disappointingly, our concerns that we outlined in previous comments have largely not been addressed in this SEIS. Further, the SEIS does not provide forward-looking sustainable features that we expect from a project in Seattle – a national leader in sustainability. Areas that could have been addressed in more innovative and aggressive ways include air vents from the tunnel, habitat along the water's edge, transit solutions, etc. Given the amount of money spent on design as well as special studies related to the viaduct and seawall replacement project, we would like to have seen more money devoted to sustainable solutions. Given that the waterfront is now designated as critical habitat for endangered Chinook salmon and bull trout we would like to see a more proactive approach devoted to providing real improvements along the water's edge related to habitat and clean water.

C-055-019

Please add People For to the project's distribution list, under "Business/Trade/Other Organizations." Thank you for your consideration of our comments. I can be reached at (206) 382-7007 X215 if you have any questions or concerns.

Sincerely,

Heather Trim
Urban Bays Coordinator

working to provide guidance and policy for those projects to implement additional improvements of the kinds you have mentioned, where feasible. For example, the September 2006 Central Waterfront Master Parks Plan Final EIS from the Seattle Parks Department includes new beaches outboard of the seawall.

C-055-009

Stormwater will be managed in accordance with the applicable stormwater management regulations as described in the Final EIS. Specific BMPs will be identified during the design phase of the project.

C-055-010

In the 2006 Supplemental Draft EIS, only the Elevated Structure Alternative created new overwater coverage. The surface street design for the Elevated Structure Alternative has been revised between Pier 48 and Colman Dock, and there is no longer a new overhanging sidewalk. Both the Cut-and-Cover Tunnel and Elevated Structure Alternatives would replace the Washington Street Boat landing in a similar location and continue to shade Elliott Bay as it does today. Under the preferred Bored Tunnel Alternative, the configuration of the Alaskan Way surface street and the Washington Street Boat Landing would be a part of the Central Waterfront Project, a separate project led by the City of Seattle.

C-055-011

The Final EIS contains more mitigation measures for many areas of the environment. These mitigation measures have been developed with substantial input from people and businesses from the affected areas and are included in Chapter 8.

C-055-012

After publication of the 2006 Supplemental Draft EIS, the Port of Seattle

agreed to the purchase of Pier 48. WSDOT purchased the property in August 2008.

C-055-013

Section 4(f) as provided in 49 USC 303(c) refers to the “use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance.” Elliott Bay is a body of water that provides for a wide range of uses and ecological functions, including navigation, recreation, and habitat for to fish and wildlife, but it is not a public park, recreation area, or wildlife refuge and is therefore not regulated as a Section 4(f) facility.

C-055-014

Your request was filled via public disclosure request on February 21, 2007, and March 22, 2007.

C-055-015

Clean Air Fine Particle Rule is an EPA action designating areas with air quality that does not meet the health-based standards established in 1997 for fine particle pollution. Fine particles are particulate matter 2.5 micrometers in diameter and smaller and are also referred to as PM2.5. Currently, the Puget Sound region is in attainment for PM2.5.

Appendix M, Air Discipline Report, of the Final EIS presents potential project effects and mitigation measures with regard to particulate matter.

C-055-016

The project is not intended to thoroughly cleanup the waterfront. Investigations will be conducted to identify contamination during the design phase to plan for protection of project workers and the public during construction and to provide information necessary to make the

design protective of the environment (e.g., avoiding creation of preferential pathways and spreading of contamination, implementing engineering controls, etc.). Information from the investigations would also be available to responsible property owners and/or Ecology, so that they might plan for and implement remediation. The build alternatives will reduce the amount and/or mobility of contaminants along the waterfront. Soil improvement techniques (deep soil mixing and/or jet grouting) will reduce the mobility of contaminants in situ and where excavation occurs, the project will identify and remove contaminants that exceed regulatory criteria whenever they are encountered.

C-055-017

Thank you for this suggestion. Information from this project has been considered in the Final EIS Appendix N, Wildlife, Fish and Vegetation Discipline Report.

C-055-018

Many of the specific items listed in this comment are not part of this project and are being addressed through other agencies. The City of Seattle's Central Waterfront Project continues to examine a variety of ways in which habitat can be improved along the central waterfront. The seawall improvements planned as part of the Elliott Bay Seawall Replacement Project are compatible with and do not preclude these enhancements. Similarly, King County Metro, Sound Transit, and other transit agencies have been closely engaged in the planning process to ensure improvements provided by this project support their long-range plans. Also, note that the Bored Tunnel Alternative does not require air vents.

C-055-019

You will be added to the distribution list for the Final Environmental Impact Statement.



Sept. 22, 2006

Kate Stenberg
WSDOT, Environmental Manager
Alaskan Way Viaduct and Seawall Replacement Project
999 Third Avenue, Suite 2424
Seattle, WA. 98104

Dear Ms. Stenberg:

C-056-001 The Draft Environmental Impact Statement (DEIS) for the Alaskan Way Viaduct & Seawall Replacement Project is incomplete and inconsistent in identifying and assessing the economic and environmental impacts of the two preferred alternatives. These shortcomings reduce the value and reliability of the DEIS. They must be overcome for the public to be able to evaluate:

- 1) the actual costs and benefits of the two preferred viaduct alternatives;
- 2) the actual costs and benefits of potential alternatives to, or modifications of, the two preferred alternatives;
- 3) the actual need for, and cost of, an appropriate construction mitigation plan, and
- 4) how viaduct alternatives rank in the context of other transportation priorities for our city, region and state.

If full economic and environmental costs are recognized and assessed, further consideration may be merited for viaduct alternatives or modifications that were previously rejected.

Our specific concerns about the draft EIS follow.

C-056-002 *1. Failure to assess all environmental impacts of construction-induced traffic congestion*

The DEIS reports that disruptions caused by construction of either alternative would double and even triple peak periods of traffic congestion along the SR 99 corridor and Interstate 5 in Seattle. Congestion of this magnitude would significantly extend the amount of time that hundreds of thousands of cars, trucks and buses would spend in Seattle stuck in stop-and-go traffic jams with idling engines. The DEIS estimates emission impacts before and after construction, but fails to address the pollution that would occur during the periods of construction-related congestion which could extend for five, eight or ten years. Likely impacts would include greenhouse gas emissions, increased gasoline consumption and increases in the amount of petroleum-based pollution winding up in street drainage and runoff systems.

Given our regional commitment to reducing greenhouse gases, this omission is breathtaking.

C-056-001

Benefits and impacts of alternatives have been discussed in each EIS on this project (Draft, Supplemental Drafts, and Final). Costs, although not strictly an environmental issue, have also been provided in these documents and through other venues. Mitigation measures for construction have been developed in coordination with business and freight interests in the project area and are included with the Final EIS, Chapter 8. The ranking of project alternatives with other regional transportation improvement priorities has been regularly considered by WSDOT and other transportation agencies in the region.

C-056-002

Potential air quality impacts during the construction period have been analyzed in Appendix M, Air Discipline Report, and summarized in the Final EIS.

C-056-003 | **2. Reduced business productivity**

The DEIS finds that 1,200 businesses are located in or adjacent to the viaduct construction zone along SR 99. The DEIS predicts some of these businesses may be forced to close by construction disruptions. The DEIS fails to acknowledge that construction impacts would extend far beyond the 1,200 businesses located in the construction zone. Arterials far removed from the viaduct area would be impacted, with backed-up traffic congestion decreasing the profitability and viability of thousands of additional businesses located throughout large sections of the city.

C-056-004 | **3. Billion dollar impacts**

Seattle businesses generate about \$45 billion in taxable business revenue per year, nearly 15 percent of all business revenues generated throughout the entire state. If the Seattle business community loses just 10 percent of its overall productivity due to viaduct-related traffic congestion, the cost would be \$4.5 billion for one year, \$22.5 billion over five years, and \$36 billion over eight years. If lost business productivity reached 15 percent, the loss would be \$6.75 billion for one year, \$33.7 billion for five years and \$52 billion for eight years. The DEIS fails to broach the topic of lost business productivity, although it does attempt to highlight potential benefits associated with the preferred alternatives, as explained in points 4 and 5 that follow.

C-056-005 | **4. Job Loss**

The DEIS estimates the numbers of jobs that could be created in Seattle by construction of either preferred alternative. It fails to recognize that jobs in Seattle will also be lost as result of business disruptions and closures, and the difficulty of retaining or replacing employees who will opt to find employment alternatives in parts of the city or the region that aren't impacted by viaduct construction-related congestion.

C-056-006 | **5. Lost tax revenues**

The DEIS notes that construction of either preferred alternative could result in increased sales tax revenues. The DEIS fails to analyze or even acknowledge that the construction disruptions to businesses would reduce revenues from the sales tax and other tax sources. The magnitude of this impact would be considerable. Businesses within Seattle generate more than \$14 billion per year in revenue that is subject to the sales tax. That's far more than any other city in our state. In fact, it is more than the \$12 billion in such sales generated in Bellevue, Tacoma and Spokane combined. B&O tax revenues would also decline if Seattle business revenues fell. These impacts would be felt not only by the City of Seattle, but by King County, the State of Washington and other public agencies.

C-056-003

It is acknowledged that there will be difficult times for businesses within the immediate impact area and that the City of Seattle will absorb a certain loss in productivity due to increases in congestion. The indirect economic impacts, such as a decrease in jobs because businesses are struggling, within the Puget Sound Region or outside of the Puget Sound Region and the relocation of businesses are subject to many variables that cannot be quantified as a result of the direct impacts due to construction. These indirect impacts, if they occur at all, are expected to be balanced by the influx of construction dollars into the regional economy and by the potential redevelopment of adjoining parcels in anticipation of the new facility.

C-056-004

The cost of congestion is not calculated as a function of the size of a regional economy but as the time lost due to increases in travel time. Some travelers may also choose to alter their choice of destination to avoid travel impacts. The discussion of travel delays presented in the Final EIS accounts for this loss of utility (i.e., selection of alternate or less desirable destinations) for travelers. With the exception of freight mobility, this increase in travel time typically happens during peak rush hour and has the effect of spreading the duration of rush hour. The increase in travel time and loss of utility are converted to dollars based upon lost wages and value of time lost. The discussion of the cost of congestion is presented in Appendix L, Economics Discipline Report, of the Final EIS.

C-056-005

Comment acknowledged. Please see the response to Comment C-056-003.

C-056-007 6. *Unmitigated losses*

Some share of Seattle's losses would be offset by gains in other cities and parts of the region that would pick up new business and workers displaced from the central city, but not all losses could be offset. Hundreds of businesses are located in Seattle because the city is home to a convergence of industrial infrastructure that includes the Lake Washington Ship Canal, the Duwamish Waterway, Fishermen's Terminal, Port of Seattle marine cargo facilities, Boeing Field and great proximity to both State Route 99 and I-5. Businesses that depend on this infrastructure will be hard pressed to relocate because similar infrastructure is not available in any other part of the state.

The economic value of these businesses was suggested by a 2005 study measuring the economic impact of the Port of Seattle. The study included a survey of more than 9,500 people engaged in some aspect of Seattle's marine cargo sector and the survey identified the community where each worker lived. Only 14 percent lived inside Seattle and only 18 percent more lived somewhere else in King County. The other 68 percent lived outside of King County where other communities reap the benefit of Seattle-based paychecks that are used to pay for everything from housing, groceries and clothes to cars, taxes and college tuitions. If these operations are disrupted, you can't assume they will simply relocate to Tacoma. Many other industrial sectors depend on proximity to Seattle's industrial and commercial infrastructure and these businesses will be hit hard by the congestion. The nature of these businesses requires most employees to perform tasks at specific locations and few jobs within these sectors lend themselves to telecommuting.

C-056-008 7. *Practical value of full analysis*

The failure to fully account for likely economic and environmental impacts reduces the ability of the general public and elected decision-makers to weigh the full range of viaduct alternatives, potential modifications to alternatives and related project needs. How can we know there is an adequate mitigation program for construction if we don't have adequate information about the extent of the mitigation that might be required? How can we assess viaduct alternatives if we lack the basis to understand and weigh their potential costs and benefits? How can you ask the public to support funding for either preferred alternative while failing to acknowledge they may have such negative impacts on Seattle's job and business base? If full costs are accounted for, some viaduct alternatives that were earlier ruled out may be found to offer much greater public cost-benefits than either of the preferred alternatives.

The viaduct does not exist in a vacuum. Washington residents face an enormous backlog of badly needed transportation projects including the need to rehabilitate the Evergreen Point Floating Bridge, complete Sound Transit, expand I-405, repave I-5, finish SR 509, save the

C-056-006

The economic analysis did address City of Seattle and King County revenue generated and lost by the project (parking meters, property tax base, sales tax) that can be tied to elements under the direct control of the project.

The economic analysis did address the impacts to businesses during construction, especially to those businesses in business districts of special concern (Central Waterfront and Pioneer Square); however, the analysis did not analyze whether a particular business would pay more, less, or the same in sales taxes, because predicting the performance of an individual business is beyond the scope of the analysis. See Appendix L, Economics Discipline Report, of the Final EIS for the current economic analysis for the proposed build alternatives.

C-056-007

Probable significant adverse impacts are not expected for either the Port of Seattle or the Ballard/Interbay industrial areas with the exception of a decrease in freight mobility and increase in congestion for truck traffic as they use alternative freight routes. The loss of freight mobility will have a resultant loss in productivity, which is discussed in the Economics Discipline Report of the Final EIS as a cost of congestion. With the exception of mitigation measures to address congestion in the project area, there is little that the project can do to mitigate impacts to businesses that are not located in the immediate construction corridor but rely on the existing roadway network to maintain a thriving business.

The indirect economic impacts, such as a decrease in jobs providing family wages, within the Puget Sound Region or outside of the Puget Sound Region and the relocation of businesses are subject to many variables that cannot be quantified as a result of the direct impacts due to construction. These indirect impacts, if they occur at all, are expected to be balanced by the influx of construction dollars into the regional

Kate Stenberg
Sept. 22, 2004
Page 4

C-056-008 South Park Bridge, enhance Metro bus service and increase SR 167. The final viaduct alternative must be pursued in the most cost-effective manner possible because it will consume so much of the public funding that must be spread among so many worthy projects. The DEIS does not provide adequate information to judge the full cost effectiveness of either preferred alternative.

Please contact us if we can answer any questions about these issues.

Sincerely,



Rob Adamson, Co-chair
Manufacturing Industrial Council



John Odland, Co-chair
Manufacturing Industrial Council

economy and by the concurrent redevelopment of adjoining parcels in anticipation of day of opening.

C-056-008

The environmental documents and related information on this project provided to the public gives a complete picture of reasonable choices the lead agencies face and their potential effects. Mitigation for construction impacts has been developed in coordination with business and freight interests along the corridor and will continue to be refined throughout the construction process. Negative effects from construction appear unavoidable, but the lead agencies are committed to minimizing them to the practical extent. These effects have been described for the public and decision-makers, as have the costs of the project.

Seattle Marine Business Coalition
2201 West Commodore Way
Seattle, WA 98199

RECEIVED
SEP 29 2006

September 22, 2006

Ms. Kate Stenberg
Alaskan Way Viaduct and Seawall Replacement Project
999 Third Avenue, Suite 2424
Seattle, WA 98104

Re: Alaskan Way Viaduct and Seawall Project- Supplemental Draft EIS

Dear Ms. Stenberg:

C-057-001 The Seattle Marine Business Coalition appreciates the opportunity to comment on the Supplemental Draft EIS for the Alaskan Way Viaduct Seawall Project. It is our understanding that the SDEIS considered a No Build Alternative and only two Build options: a Tunnel and a new Elevated Structure. We respectfully suggest that the Build Alternatives which were considered in the SDEIS will have effects during the construction period that cannot be adequately mitigated. The cost of the two Build Alternatives which were considered would be so great as to frustrate the fundamental purpose of the Project of maintaining a sustainable local and regional economy. The SDEIS has failed to adequately address this critical issue.

C-057-002 As a city and state which are dependent on trade and the shipment of goods, the No-Build Alternative is not a solution. We respectfully suggest that under the circumstances other Build alternatives, notably the Retrofit option, deserve much greater consideration.

C-057-003 Shutting down of SR-99 for a period of years with the resulting increased cost of shipping will have much greater and more disastrous impacts on Seattle's industrial and manufacturing businesses than the SDEIS has acknowledged. The impacts of the Alternatives considered in the SDEIS cannot be adequately mitigated. The SDEIS fails to adequately acknowledge the interdependence of Seattle's two Manufacturing and Industrial Areas, i.e., the Duwamish and the Ballard Interbay Northend Manufacturing Industrial Center, and the extent to which they are dependent on daily shipping of parts between these two areas. Washington State's B & O tax structure forces most of these businesses to avoid accumulating inventory, with the consequence that Washington manufacturing and industrial businesses need to rely on having truck drivers pick up and deliver parts as they are needed. Employers must pay truck drivers by the hour, so delays caused by shutting down of SR 99 will have a direct and disastrous impact on their bottom line.

1

C-057-001

The lead agencies are well aware of the potential effects on local businesses during construction. The construction transportation mitigation measures described in the Final EIS and Appendix C, Transportation Discipline Report, include many actions and programs to reduce construction impacts and support the local economy. Many of these ideas were presented in general in the 2006 Supplemental Draft EIS and since have been developed in greater detail.

C-057-002

The lead agencies recognize that retrofitting highways, roadways, and bridges is often a viable option to counter earthquake threats. However, unlike other bridges and structures in the area, it isn't practical to retrofit the viaduct by only strengthening one or two structural elements. Fundamentally, such fixes transfer the forces from one weak point in the structure to another, and the viaduct is weak in too many places. The concrete frames, columns, foundations, and even the soil under the structure don't provide enough strength by today's standards. The lead agencies have studied various retrofitting concepts, and all of these concepts fail to provide a cost-effective, long-term solution that adequately addresses the risks to public safety and the weakened state of the viaduct. The lead agencies also determined that retrofitting 20 percent of the viaduct as discussed for the Rebuild Alternative is not reasonable.

C-057-003

If the preferred Bored Tunnel Alternative is selected, closure of the viaduct would be for a short duration (several weeks) during construction. This is one main benefit of this alternative. Probable significant adverse construction impacts are not expected for either the Port of Seattle or the Ballard/Interbay industrial areas with the exception of a decrease in freight mobility/increase in congestion for truck traffic as they use alternative freight routes. The loss of freight mobility will have a

- C-057-006** | Missing from the SDEIS is acknowledgement of the likelihood of the City and perhaps the State losing these manufacturing and industrial businesses, and the family wage jobs they provide. The pertinent statute requires assessment of the proposed project on racial and ethnic minorities many of whom are currently employed by the industries which will suffer severe negative impacts from the proposed Tunnel or new Elevated Structure and the concomitant lengthy shutdown of SR 99. In other words, the SDEIS fails to meet the statutory requirement for adequate assessment of the Project's impacts and is in that regard fatally flawed.
- C-057-007** | Similarly there has not been an adequate assessment of the resulting impacts on the Ballard, Interbay, and Northend businesses which support and depend on Seattle's industries and freight movement.
- C-057-008** | The SDEIS also failed to adequately consider the disastrous Construction Impacts on Seattle's marine businesses along the Central Waterfront. The likely damage to them would be irreparable. For example, it is questionable whether Argosy Cruises would be able to survive.
- C-057-009** | The proposed Tunnel would have a 7% grade. The 7% grade in the proposed tunnel configuration will reduce drivers' line of sight resulting in a slowing of freight movement and creating congestion. The traffic impacts of these characteristics of the proposed tunnel have not been adequately assessed.
- C-057-010** | The SDEIS does not adequately assess the impacts of the restrictions the Tunnel Alternative would have on the transport of combustible and hazardous material. Those restrictions would injure key Ballard businesses and the Seattle based fishing industry they serve.
- C-057-011** | The Draft EIS issued in 2004 was premised on the construction of a Monorail between Ballard and West Seattle. The monorail was presented as a form of mitigation to some of the traffic impacts. Now it is clear that a Monorail will not be built. The SDEIS fails to adequately assess the impacts of the Projects under these new circumstances.
- C-057-012** | It is our understanding that there are other elevated alternatives that would be much less costly and have substantially fewer negative impacts. The Seattle Marine Business Coalition will welcome the opportunity to be a resource for exploring and developing these better alternatives. In particular we request more consideration of the Retro-fit Option. A Retro-fit can be accomplished at a greatly reduced cost. In 30 to 50 years, when the Retro-fit will have lived its useful life, global warming and the necessary curtailment of CO₂ emissions will have drastically changed traffic patterns. A new and appropriate solution can be built at that time.
- C-057-013** | The cost of the two Build alternatives which were considered in the SDEIS would be so great as to frustrate the fundamental purpose of the Project of creating a sustainable local and regional economy. Especially in light of the newly revised cost estimates the other Build Alternatives, notably including the Retro-fit Option deserve much more serious consideration.

resultant loss in productivity, which is discussed in Appendix L, Economics Discipline Report, of the Final EIS as a cost of congestion.

C-057-004

A detailed discussion of freight generators, freight corridors, and impacts to freight is included in the freight sections of the Final EIS Appendix C, Transportation Discipline Report.

C-057-005

The build alternatives would result in enhanced mobility to activity centers in both the south and north portal areas and beyond, particularly to the SODO commercial and business district and the stadium area. Overall, the infrastructure improvements in the north portal area would improve truck freight mobility and vehicle and pedestrian connections. In turn, these benefits would improve business efficiencies due to the increased circulation near the project area. The build alternatives would contribute to local and regional mobility by providing drivers with an alternative to I-5 and Seattle's surface streets. The benefits of the Elevated Structure Alternative would not be as substantial as those described for the Cut-and-Cover Tunnel Alternative and Bored Tunnel Alternative.

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the other two alternatives. Extended closure of SR 99 would be more disruptive to Seattle and the Puget Sound region. Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS provide a more in-depth comparison of trade-offs for the three alternatives.

C-057-014

We feel strongly that the SDEIS is severely flawed, and that the flaws are leading to decisions which will be disastrous to City of Seattle and the State of Washington. This being sad, we look forward to working with City and State staff as they continue to work toward the goal of improving or maintaining freight mobility and simultaneously sustaining Seattle's economy.

Respectfully,


Peter Philips
President


Lise Kenworthy
Immediate Past President

SMBC/Alaskan Way Viaduct SDEIS Comment 92206

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A more in-depth discussion of economic effects is provided in Appendix L, Economics Discipline Report. A more in-depth discussion of mobility, including freight, is provided in Appendix C, Transportation Discipline Report.

C-057-006

The build alternatives would result in enhanced mobility to activity centers in both the south and north portal areas and beyond, particularly to the SODO commercial and business district and the stadium area. Overall, the infrastructure improvements in the north portal area would improve truck freight mobility and vehicle and pedestrian connections. In turn, these benefits would improve business efficiencies due to the increased circulation near the project area. The build alternatives would contribute to local and regional mobility by providing drivers with an alternative to I-5 and Seattle's surface streets. The benefits of the Elevated Structure Alternative would not be as substantial as those described for the Cut-and-Cover Tunnel Alternative and Bored Tunnel Alternative.

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Environmental documentation for the project has been prepared in compliance with the National Environmental Policy Act (NEPA) (42 USC 4322(2)(c)) and the State Environmental Policy Act (SEPA) (Ch. 43.21 C

RCW). The potential effects on low income and minority populations are discussed in Environmental Justice section of the Final EIS Appendix H, Social Discipline Report. A more in-depth discussion of economic effects is provided in Appendix L, Economics Discipline Report.

C-057-007

Discussions related to economic impacts are included in the Final EIS and in Appendix L, Economics Discipline Report.

C-057-008

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

C-057-009

Heavy vehicles constitute approximately 6 percent of the Average Daily Traffic (ADT) volume in the northbound direction. The Bored Tunnel grades do not exceed 4 percent and would have only a marginal effect on truck speeds. The Cut-and-Cover Tunnel Alternative south of the Battery Street Tunnel south portal would have grades of 6.5 percent (steepest grade), but this section is only about 800 feet in distance.

C-057-010

At this time, transporting hazardous materials in the Battery Street Tunnel is prohibited. The Final EIS notes that hazardous and flammable cargo would be prohibited in the Bored Tunnel and Cut-and-Cover

Tunnel all day. Currently hazardous/flammable materials can be transported on downtown city streets without restriction, as long as the trucks do not exceed 30 feet in length. Vehicles exceeding 30 feet in length carrying hazardous or flammable materials wishing to travel through downtown Seattle would continue to use I-5 or Alaskan Way. This practice is not expected to change as a result of Alaskan Way Viaduct Replacement Project construction activities.

C-057-011

The Seattle Monorail Project's Green Line is no longer being considered for implementation, and therefore cannot be assumed as a mitigation strategy to either complement or replace the project. However, other high-capacity transit developments have occurred since the 2006 Supplemental Draft EIS was published. The most important of these is the voter approval of Metro's Transit Now initiative, which provides additional bus transit services in the same corridors served by the original Green Line. This service, called RapidRide, provides faster and more reliable service, more times of the day, from West Seattle, Ballard/Interbay, and North Seattle.

The Alaskan Way Viaduct Replacement Project team will continue to work closely with King County Metro and other transit providers to support the planning and implementation of expanded transit services to enhance the mobility of travelers during project construction. More information about congestion relief strategies for construction can be found in Appendix C, Transportation Discipline Report, of the Final EIS.

C-057-012

A retrofit alternative has been suggested many times and has been carefully reviewed by WSDOT and independent organizations such as the American Society of Civil Engineers. In brief, a retrofit that approaches the design goals of the project (needed to protect public safety) cost nearly as much as a new structure and does not remedy

other serious deficiencies such as narrow lanes and shoulders. Expecting global warming or other issues to eliminate the need for this critical transportation facility is speculative and not responsible planning.

C-057-013

The cost estimates and funding for the project have continued to be defined and are further described in Chapter 2 of the Final EIS.

C-057-014

FHWA, WSDOT, and the City of Seattle have conducted an extensive level of design and analysis, as shown in the Final EIS. The project team is committed to working with organizations such as yours to make the Alaskan Way Viaduct Replacement Project successful.

September 18, 2006

WSDOT
Attn: Kate Stenberg, AWV Environmental Manager
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104-4019

Dear Ms. Stenberg:

Thank you for the opportunity to comment on the recently issued Supplemental Draft EIS (SDEIS) for the Alaskan Way Viaduct and Seawall Replacement Project (AWV). The Belltown Business Association, representing many businesses in the immediate area of the Viaduct, has reviewed the SDEIS and offers the following comments.

C-058-001 First of all, it is very gratifying to us that the project partners have elected to include the "Under Elliott and Western" option as the primary alternative for the transition segment between the Battery Street Tunnel (BST) and the new tunnel. This option makes sense in many ways, not the least of which is the dramatic decrease in environmental impacts to our community when compared with the other alternative. Let us reemphasize that the other alternative, the "Over Elliott and Western" option, is totally unacceptable to the Belltown business and residential community because this outcome will leave us in a worse position in terms of noise, dust, and visual impacts than with the structure as it is today. Contrary to what is stated in the SDEIS, the Over Elliott option would not be "similar to the way that it is today." It would be a larger and higher highway that would increase noise, dust, and visual impact to the Belltown community. Belltown will be suffering tremendous negative impact during the lengthy construction period, and it is unconscionable that the conclusion of the "construction decade" could leave us worse off than we are now.

C-058-002 Although we are pleased with the representation of the Under Elliott option as the primary alternative, we are disappointed that one of our key requests, i.e., the lidding of the entire stretch of highway between the new tunnel and the BST, is not included in the project plans. In addition to completely negating the adverse effects of the highway on our community, this lid would be a tremendous public asset providing substantial developable open space, a significant connection between Belltown and the Waterfront, and improved pedestrian and bicycle connections in this area. We continue to hope that the project designers will forthrightly make provisions in the design for the AWV so that the full lidding of the transition could be readily accomplished should funding become available. We support the partial lid that is proposed as an alternative (the Steinbrueck Lid) so long as it does not preclude the future lidding of the entire transition segment.

C-058-003 Finally, although we are being presented with an EIS for review, many of the most significant environmental issues are related to the decade long construction period and its

C-058-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments supporting configuring SR 99 under Western and Elliott Avenues. We also note your concerns related to the "over Western and Elliott" configuration. With the Cut-and-Cover Tunnel Alternative, SR 99 would be constructed under Elliott and Western Avenues. The Elevated Structure Alternative no longer proposes replacing the current Western and Elliott overpass with a new elevated structure. Instead the existing structure in this area would be retrofitted. This proposal would lower costs, and would not noticeably alter existing conditions in regards to noise, dust, and views.

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support that it has received from diverse interests. With this alternative, the Elliott/Western Connector is a separate project. Please refer to the Final EIS for current information.

C-058-002

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel Alternative and evaluated in the 2006 Supplemental Draft EIS. It was included in the project, due in part to numerous 2004 Draft EIS public comments requesting the lead agencies to consider a lid in the Pike Place/Belltown area. The proposed lid would extend north from where SR 99 emerges from the tunnel's north portal near Pine Street to Victor Steinbrueck Park near Virginia Street. The design for this lid structure with the current Cut-and-Cover Alternative is described in this Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.

C-058-003

As part of the project's planning and design process the lead agencies have met with residents, business owners, property owners, and other

C-058-003

draconian, long-term effects on the Belltown community. The SDEIS covers these impacts in a very general manner and indicates that there will be further study, public meetings, and committee work to address the impacts of the construction decade including traffic (transportation management), noise, and mitigation. To many of us who are Belltown residents or business people, these construction period effects will be interwoven into major portions of our lives, and we are very deeply apprehensive about them. So, we need to see a more specific plan and timeline as to how noise, dust, and traffic impacts are going to be addressed and how the community will be included in the process from the beginning. Some information of this nature was provided to us at the recent public hearing, and we are looking forward to additional communications and involvement in this process.

We continue to be appreciative of the continued opportunities for communication with the project leadership and with the efforts of the team to tackle what is surely the most formidable public works project ever undertaken in Seattle. We look forward to working with the project team to help bring this project to a successful conclusion. Please feel free to contact me or our Transportation Chair, Greg Schuler (contact information below) should you have questions regarding the BBA positions.

Sincerely yours,

Chuck Stempler
President
Belltown Business Association

BBA Transportation Chair:
Greg Schuler
Antioch University Seattle
2326 Sixth Avenue
Seattle, WA 98121

Phone: 206-268-4013
e-mail: gschuler@antiochseattle.edu

stakeholders in the Belltown neighborhood to provide information about the project - including potential effects - and to solicit ideas about how to minimize and mitigate these effects. We appreciate the cooperation of Belltown stakeholders and will continue to meet with them throughout the project to ensure that the project's planning and design addresses the Belltown neighborhood concerns.

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the other two alternatives. Extended closure of SR 99 would be more disruptive to Seattle and the Puget Sound region. Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS provide a more in-depth comparison of trade-offs for the three alternatives.

September 20, 2006

WSDOT
Attn: Kate Stenberg, AWV Environmental Manager
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104-4019

Dear Ms. Stenberg:

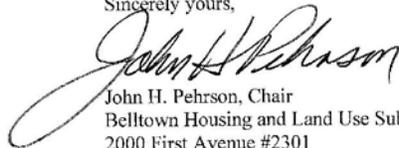
C-059-001 | On behalf of the Belltown Housing and Land Use Subcommittee, I want to endorse the comments made by the Belltown Business Association in their letter dated September 18, 2006, which is attached. Our organization has reviewed the September 18, 2006 letter. It properly reflects the positions we have taken in the past and our current position.

In short summary:

- C-059-002** | 1. We are pleased you have changed to include the "Under Elliott and Western" Option as your baseline. A new, elevated freeway in our neighborhood is unacceptable.
- C-059-003** | 2. The Supplemental Draft EIS is deficient in not including considerations (designs, renderings and costing) for a lid of the Under Elliott and Western Option. There are significant environmental impacts remaining and mitigation measures of those must be included.
- C-059-004** | 3. The Supplemental Draft EIS is deficient in not including any analysis of the construction impacts on our neighborhood. Construction schedules based upon 24/7, noisy work in our residential community is not acceptable. Basing a schedule and costing upon that is faulty. We recognize there will be impacts from construction traffic and traffic diverted from SR-99. The impact of this on our mixed-use neighborhood must be analyzed and appropriate mitigation measures included in the plan and costing.

If you have any questions, please call upon me.

Sincerely yours,



John H. Pehrson, Chair
Belltown Housing and Land Use Subcommittee
2000 First Avenue #2301
Seattle, WA 98121
206-441-9913
pehrsonj@comcast.net

cc: Greg Schuler

C-059-001

We recognize your endorsement of the Belltown Business Association letter (C-058). Please refer to C-058 to view the responses to the letter.

C-059-002

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments expressing support for the under Elliott and Western option, and concern about the over Elliott and Western option. The option to configure SR 99 under Elliott and Western Avenue is paired with the Cut-and-Cover Tunnel Alternative. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. With this alternative, the Elliott/Western Connector is a separate project.

C-059-003

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments related to including a lid. The alternatives have changed with the 2010 Supplemental Draft EIS to include a lid in the range of 250 feet in length only with the Cut-and-Cover Alternative. If this alternative is selected, the design process will be led by Seattle and involve neighborhood interests. However, the lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support that it has received from diverse interests.

C-059-004

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99

during construction and can be built in a shorter period of time than the other two alternatives. Extended closure of SR 99 would be more disruptive to Seattle and the Puget Sound region. Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS provide a more in-depth comparison of trade-offs for the build alternatives.



Puget Sound Energy, Inc.
P.O. Box 97734
Bellevue, WA 98008-9734

RECEIVED
JUN 02 2004
AWWSP Team Office

June 1, 2004

Ms. Allison Ray
WSDOT
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

Re: Comments on Alaskan Way Viaduct Draft Environmental Impact Statement (DEIS)

Dear Ms. Ray:

Puget Sound Energy (PSE) appreciates the opportunity to provide comments on the Alaskan Way Viaduct and Seawall Replacement Project DEIS. PSE is the largest energy supplier (natural gas and electricity) in the State of Washington. We provide natural gas services to approximately 110,000 customers within the City of Seattle. PSE has a gas service base of almost 650,000 customers in six counties.

PSE recognizes that the Alaskan Way Viaduct and Seawall Replacement Project is an extraordinary undertaking with national and regional significance. PSE strives to maintain a positive, professional and productive relationship with all the customers we serve. The relationships we have with the City of Seattle, WA State Department of Transportation (WSDOT) and USDOT's Federal Highway Administration (FHWA) are extremely important to PSE. We view these partnerships as critical to executing the work on the Viaduct and providing safe, reliable, efficient and cost-effective energy services to our customers. We support the work of these entities and the various stakeholder groups working to accomplish this project.

As part of PSE's service obligation, we are required to maintain and reinforce our natural gas system as the need arises. New growth increases demand for energy services and associated infrastructure, while decreasing available space for utility infrastructure creates hardships on our system. As part of any major transportation project requiring utility relocation, PSE must have the ability to access and maintain safe, immediate and reliable service to our customers. To do otherwise puts the reliability of our natural gas system, the general public, and our customers at risk.

Puget Sound Energy is among many utilities that have facilities on, under, or near the Viaduct and Seawall. In addition to the Viaduct's role as a major, regional transportation thoroughfare, the Viaduct corridor also acts as a major "utilidor" for many utilities (including water, sewer, steam, natural gas, telecommunications, fiber optic cables, and electricity).

Puget Sound Energy has natural gas mains, services and a supply line located under and directly proximate to the Viaduct. A 12" diameter natural gas supply pipeline serves PSE customers throughout Seattle and in other parts of King and Snohomish counties. Multiple other distribution lines serve Seattle businesses and households along the waterfront and neighboring areas. PSE has no facilities attached to the Viaduct

structure. When construction begins on a Viaduct replacement it is our understanding that some or all of our facilities may need to be relocated once or multiple times depending upon which replacement alternative is selected. Based upon the replacement options, here are some of PSE's specific comments regarding the DEIS:

- B-001-001**
1. There are many alternatives as part of this DEIS process. PSE relocation engineering will not begin until a preferred alternative is selected due to the myriad of design alternatives. After the selection of a preferred alternative, PSE will need adequate time to perform engineering duties.
- B-001-002**
2. PSE recommends the use of a master permit system to jointly permit all utilities so any potential permitting issues do not delay the overall project schedule.
- B-001-003**
3. Projects of regional significance need to address all project impacts. Utility relocation costs are a construction impact for both public and private utilities and should be included in the estimated project cost for purposes of evaluating alternatives and making public policy decisions. Moreover, environmental impacts resulting from utility relocation activities should be evaluated in this EIS, as this work relies solely on the Viaduct replacement as their justification and any replacement cannot go forward until utilities are relocated. They are in effect, a single course of action.
- B-001-004**
4. PSE and other private utility customers should not be expected to subsidize project construction costs, which result from a series of construction impacts that occur over time. This would place an unfair burden of natural gas utility relocation costs upon PSE customers.
- B-001-005**
5. Project work sequence, schedule and construction methods should be considered and designed to avoid multiple relocations of existing utilities.
- B-001-006**
6. PSE facilities need to be properly supported and protected during construction. Drilling, pile driving and other construction activities, including improving or excavating soil, also will need to be assessed in order to protect any existing natural gas facilities during construction for safety purposes. To prevent impacts to utilities and as a mitigation measure, PSE should be included in the construction planning process, especially to determine the need to have a representative on site when work occurs near our facilities.
- B-001-007**
7. PSE will need to perform normal utility maintenance activities on its facilities before, during and after any required pipeline relocations that should be considered when determining final location of facilities. Compliance with standards will need to be considered in the utility design phase of the project, including depth and separation of facilities, especially from other utilities.
- B-001-008**
8. Utility relocation plans should place a high priority on continuity and uninterrupted service to existing customers. For example, on the waterfront, PSE currently serves approximately 50 commercial customers with natural gas lines that are attached under the existing piers. Additionally, PSE's 12" diameter supply pipeline within the proposed project area cannot be disconnected for relocation work due to PSE's regulatory obligations to provide continued service to

B-001-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. The Final EIS evaluates three build alternatives: Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure Alternatives. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs.

Construction activities within each traffic stage are summarized in the Final EIS Appendix B, Alternatives Description and Construction Methods Discipline Report.

The project will continue to coordinate closely with all of the utility providers, both public and private.

B-001-002

The project team has undertaken a coordinated permitting effort to ensure project permits and approvals are obtained in a timely manner. This includes:

- Working closely with the utility and design groups to ensure that appropriate permits are received during the life of the project
- Incorporating permitting in the project base schedule
- Working closely with the project schedulers to ensure permits are obtained in advance of all utility and construction work
- Holding early pre-application meetings with permitting agencies allowing early review of design plans and environmental documents
- Tracking permit requirements, permits and permit commitments in a project-wide database

B-001-003

Potential utility relocations are discussed in Chapter 6 of the Final EIS

B-001-008

customers. PSE requests that the lead agencies include this issue when developing their final utility relocation plan.

B-001-009

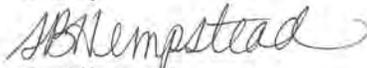
9. Coordination of utility relocations is part of the critical path for any of the five alternative Viaduct replacement projects. All relocations should be engineered smartly and efficiently in concert with the project calendar. Ongoing coordination and communication could be key to achieving project milestones. The FEIS should include preparation of a master utility relocation plan as a mitigation measure or significant, unavoidable, adverse impacts could occur to utilities.

B-001-010

10. As a result of this project, PSE may need to relocate and restore services on private property associated with this work. Any final utility plan should reflect this issue.

Thank you for the opportunity to comment on the proposed Alaskan Way Viaduct and Seawall Replacement Project DEIS. If you have any questions concerning these comments, please contact me at 425-456-2838 or susan.hempstead@pse.com.

Sincerely,



Susan Hempstead
Local Government & Community Relations Manager
PUGET SOUND ENERGY

Appendix K, Public Services and Utilities Discipline Report.

Although costs are an important part of project planning and decision-making, they are not part of the NEPA environmental review process. However, overall project costs, which includes costs associated with utility relocation, are discussed in the overall project description and are certainly part of the lead agency decision making considerations. Costs of relocating private utilities located in public rights-of-way are generally borne by the utility and are not included in the project costs paid for with public monies.

B-001-004

The lead agencies do not expect private utilities to subsidize project construction costs. The responsibility of private utilities located within public rights of way has been clearly defined by law and in the courts. Fulfilling that responsibility does not constitute a subsidy. The lead agencies have coordinated directly with Puget Sound Energy over time on construction planning and will work to minimize project effects as is practical and feasible.

B-001-005

The project's proposed construction sequencing, schedule, and construction methods for the alternatives are discussed in the Final EIS Appendix B, Alternatives Description and Construction Methods Discipline Report. The development of the utility plans has occurred with input resulting from ongoing coordination with both the private and public utility providers to reduce the number of utility relocations to the extent possible.

B-001-006

The utility design has been developed with extensive coordination between the utility providers and the utility engineers. PSE has

participated in this coordination. It is anticipated that such coordination will continue in future design phases as the utility designs are finalized. The need to have a PSE representative on site during construction will be determined during future design phases and reflected in project specifications.

B-001-007

PSE, along with other affected private utility providers, has been and will continue to be included in meetings and other direct communications related to the utility relocation planning. The project utility design team is well aware of the critical need to maintain access to utility lines for continued operation and maintenance. These needs will be reflected in the design of the final utility locations.

B-001-008

The need for continuous operation of utility lines to existing customers is a baseline consideration in the development of utility relocation plans. PSE and other affected utility providers have been and will be included in the coordination and development of utility relocation plans through meetings, e-mail with staff, and discussions relating to standards criteria. PSE and other utility providers will continue to be involved in design and construction issues as the design plans proceed.

B-001-009

A consolidated utility relocation plan is listed in Final EIS Appendix K, Public Services and Utilities as a potential measure to mitigate the effects of the utility relocation process. PSE and other affected utility providers have been and will be included in the coordination and development of utility relocation plans through meetings, e-mail with staff, and discussions relating to standards criteria. PSE and other utility providers will continue to be involved in design and construction issues as the design plans proceed.

B-001-010

The project design team will complete the design of the project to a 30 percent to 60 percent design level, including the identification of affected utilities. As part of the design process, the design team will notify each potentially affected utility that relocation or other protection measures for their facilities will be required. A final utility relocation plan will be developed with the assistance of the affected utilities. However, each utility will be responsible for the final design and construction of the relocations or protection measures required for their facilities. As part of that effort, private utilities will be responsible for identifying and procuring any operating rights, easements, or franchise rights necessary to adjust their facilities.



May 28, 2004

Allison Ray
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

RECEIVED
JUN 01 2004
AWWSP Team Office

Re: Alaskan Way Viaduct and Seawall Replacement Project DEIS

Dear Ms. Ray:

Thank you for the opportunity to comment on the Alaska Way Viaduct and Seawall Replacement Project DEIS. The analysis of the alternatives for Viaduct and Seawall replacement South of the Battery Street Tunnel is thorough and thoughtful. However, the analysis of various options north of the Battery Street Tunnel (the North segment) lacks the same kind of rigor.

We have a once-in-a-lifetime opportunity to do the right thing with respect to both Seattle's Waterfront and the North segment. It would be a shame for this region and state to select the right long term solution for the Waterfront and not do the same for the North segment.

B-002-001

While the DEIS recognizes that changes to the North segment are necessary components of a long-term SR 99 corridor solution and short-term construction period traffic mitigation, the only North segment option that is thoroughly analyzed in this DEIS happens to be the only alternative that precludes the best long-term solution for the North segment.

This failure to thoroughly analyze all North segment options appears to be at variance with SEPA requirements and not in the best interests of the City. Therefore, we respectfully request that the Project Team analyze the Lowered Aurora Option and the Surface Option (which includes signalizing Roy, Republican and Harrison Streets) with the same degree of thoroughness and thoughtfulness as the Widened Mercer Underpass option. This should include an equal level of analysis for construction period traffic planning.

Required SEPA Analysis of Project Alternatives, Impacts and Mitigation Measures

B-002-002

SEPA requires the lead agency to provide a detailed statement on major actions that significantly affect the quality of the human environment. The detailed statement must include: 1) the environmental

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B-002-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments and recognize your concerns related to analysis of the options considered for the area north of Battery Street Tunnel. Numerous options were thoroughly analyzed for this stretch of SR 99. The configuration that has been chosen as part of the preferred alternative would build Aurora Avenue at-grade between Denny and John Street. John, Thomas, and Harrison streets would be connected as cross streets with signalized intersections on Aurora Avenue. Mercer Street would become a two-way street. These improvements would greatly enhance connections between the South Lake Union neighborhood, and the lower Queen Anne neighborhood.

B-002-002

In the 2004 Draft EIS, both the Partially Lowered Aurora and Lowered Aurora options that were included were thoroughly and thoughtfully analyzed at the same level of detail. This analysis included a description of the opportunities and constraints in Chapters 5 through 9 of the 2004 Draft EIS for each specific alternative, and descriptions of potential construction methods and effects in Chapter 10. As the project evolved, further analysis of alternatives was included in the 2006 and 2010 Supplemental EISs. Please see Chapter 3 in the Final EIS for a description of the current configuration for each alternative in the north portion of the project area. Chapter 5 of the Final EIS discusses the permanent effects of the alternatives.

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B-002-002

impact of the proposed action; 2) any unavoidable adverse environmental impacts of the proposed action; 3) alternatives to the proposed action; and 4) any irreversible and irretrievable commitments of resources which would occur if the proposed action were implemented. RCW 43.21C.031(1)(c).

SEPA specifically requires an EIS to "devote sufficiently detailed analysis to each reasonable alternative to permit a comparative evaluation of the alternatives including the proposed action." WAC 197-11-440(5)(v).

In this case, the EIS should provide the same level of analysis for impacts of the Lowered Aurora Option and the Surface Option as it does for the Widened Mercer Underpass Option. Id; WAC 197-11-440(6). The EIS does not satisfy this requirement and therefore provides no basis for a comparative evaluation of the impacts of the alternatives.

A more thorough and complete analysis of the Lowered Aurora Option will show improved street grid connections which will have a tremendous impact on this part of Seattle and its neighborhoods.

Scoping

During the scoping process, many interested parties, including neighborhood organizations, environmental groups, property owners, and urban design professionals, suggested that the replacement of the Alaska Way Viaduct provides an excellent opportunity to reverse a devastating, decades-old decision. That decision was to sever the South Lake Union neighborhood from the Lower Queen Anne/Uptown neighborhood, by building a surface highway with inadequate and unsightly East-West connections. The street grid was destroyed. During the early phases of studying the Alaska Way Viaduct, it became clear that the street grid could be reestablished by simply lowering Aurora, closing the diagonal Broad Street, and reconnecting the surface streets.

We were chagrined to find that this DEIS provides little or no analysis of the Lowered Aurora option, despite repeated assurances throughout the scoping process that this option would be carried forward. Furthermore, there has been little analysis of the surface street (with signalized Roy, Republican and Harrison Streets) option. While it is clear that each of these options has impacts, the DEIS provides no comparative analysis of those impacts, and therefore, provides an inadequate basis for making a project decision with respect to the North segment.

The only comparison between the Lowered Aurora and Widened Mercer Underpass alternatives appears to acknowledge some of the relative benefits of the Lowered Aurora alternative. In chapter 6, section 12, the DEIS includes the following comparison between these two sets of improvements:

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"In the North end of the project area, SR 99 is currently a barrier for people and traffic moving between neighborhoods to the east and west. The Widened Mercer improvements would benefit these neighborhoods by improving east-west connections across SR 99 at Mercer and Thomas Streets. The Lowered Aurora/SR 99 option has an even greater potential for improving connections, since up to five streets currently cut off by SR 99 would be reconnected via bridges." (Emphasis added).

While acknowledging that there may be benefits of one option over another, the DEIS makes no effort to distinguish the alternatives in the North segment through sound analysis. In this respect, the DEIS falls short.

It is also interesting to note that this limited discussion of the apparent benefits of the Lowered Aurora option appears only in conjunction with the Aerial Alternative along the Waterfront segment. Of course, this benefit of the Lowered Aurora option (and other benefits that have not yet been analyzed) would apply equally with respect to the Tunnel Option and the Bypass Option.

Summary of Unanalyzed Impacts and Likely Lowered Aurora Option Analysis

As indicated, the DEIS falls short of SEPA requirements because it does not adequately identify Project impacts of any alternative other than the Widened Mercer Underpass. Accordingly, the DEIS should be revised to adequately reflect the impacts associated with alternatives other than the Widened Mercer Underpass Option as detailed below.

In order for the Project Team to make the best choice among alternatives North of the Battery Street Tunnel, it is necessary that the various alternatives be fully analyzed. The improved street and connections attendant to the Lowered Aurora option, as acknowledged in chapter 6, would have a tremendous impact on this part of Seattle and its neighborhoods.

First, the Lowered Aurora alternative would provide a variety of options for vehicles trying to move east-west across Aurora. This is important for the future of the Mercer Street Corridor, because it would relieve Mercer Street of most of its traffic which is not destined for Interstate 5. In other words, vehicles taking local trips could avoid Mercer Street altogether.

Second, the Lowered Aurora alternative would provide many more, and much more usable and pleasant, options for pedestrians crossing Aurora between the Seattle Center and South Lake Union. Under the widened Mercer alternative, pedestrians could cross only in a busy tunnel at Mercer Street, or across a steep (14 to 18 percent grade) overpass at Thomas Street. The Lowered Aurora option would provide up to five, level-grade pedestrian crossing options.

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Third, the Lowered Aurora provides many more options for transit and bicycle connections across Aurora. Under the Widened Mercer alternative, some forms of transit, such as a streetcar and bicycles, would not be able to cross Aurora at all, because of traffic volumes in the Mercer Street Tunnel and the steep grade on the Thomas Street overpass. On the other hand, the Lowered Aurora option would provide several potential level-grade options for crossing.

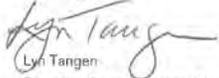
Finally, the reconnection of the street grid and the elimination of the diagonal Broad Street will create a number of new standard City blocks, many of which are owned by the City of Seattle. If this option were selected, these blocks and the adjacent privately-owned blocks could be redeveloped, further knitting the neighborhoods back together and generating significant revenue to the City, through newly captured property values and tax revenues.

The South and Central Segments

B-002-003

This state and region must replace the existing viaduct and seawall. The current level of risk to human life, as well as to property, is untenable. The Project Team has been thorough and complete in its analysis of the various alternatives for the South and Central segments of this project. From this analysis, it appears that the Tunnel Alternative has many advantages over the other alternatives analyzed. If possible, and economically feasible, this region must maintain the vehicular capacity that exists on the current viaduct. More importantly, for the economic and competitive future of this region, we must reclaim and revitalize our waterfront. To date, the biggest obstacle to that goal has been the Alaska Way Viaduct. Today, we have the opportunity to protect the public health and safety and improve our State's economic future with one project, replacing the Alaska Way Viaduct and Seawall. Let's do it right.

Sincerely,



Lyn Tangen
Director, Government and Community Relations

B-002-003

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

June 1, 2004

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AWWSP Team Office

Via Hand Delivery

Allison Ray
ALASKAN WAY VIADUCT & SEAWALL REPLACEMENT PROJECT
999 Third Avenue, Ste. 2424
Seattle, WA 98104

Re: Draft EIS Comments

Dear Ms. Ray:

These comments on the Draft Environmental Impact Statement ("DEIS") are submitted by each of us signing below. We each have deep and long-standing interests in downtown Seattle real estate generally, and more particularly in the Seattle Waterfront. Graham & Dunn, a 110-year old Seattle law firm, occupies much of Pier 70 and currently has 130 people working there. Entities controlled by John Goodman and Fred Grimm own Pier 70, the Northwest Worklofts, the Skyway Luggage Building, the Coleman Building, the OK Hotel Building and other parcels. Goodman's and Grimm's businesses, Pinnacle Realty Management and Triad Development, employ 175 people on Pier 70. Entities controlled by the principals of Martin Smith Inc (Mickey Smith and Jeff Roush) own Piers 55 & 56, the Seattle Trade & Technology Center (RealNetworks) Building, the 1201 Western Building, the 83 King Building, the Provident Building, and other sites. Gregory B. Smith controls the 8-acre WOSCA/Stadium Center site and other nearby parcels. Martin Selig owns the Airborne Building and 3131 Elliott, located exactly where the "bypass tunnel" is proposed to start/finish. Diamond Parking Services operates and owns parking facilities on or near the waterfront; its office is on Elliott. Mithun, the architecture, design and planning firm, occupies much of Pier 56. Argosy Cruises is Seattle's pre-eminent cruise operation on Elliott Bay, and occupies space on Piers 54, 55, 56 and 70. The properties owned, controlled or occupied by the signatories to these comments are depicted in red on the enclosed map.

B-003-001

Each of us submitting these comments has interests in Downtown Seattle and Seattle Waterfront real estate that will be profoundly affected by the Viaduct & Seawall Replacement Project. All of our businesses depend upon, and each of us has invested significantly in reliance upon, the ease of access along Alaskan Way, the amenity of our Waterfront (or nearby) locations and the outstanding pedestrian environment that has been created along and near Alaskan Way over the last decade. Our businesses, our tenants, our employees and our customers will suffer severe,

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B-003-001

The information provided in environmental documents for this project is appropriate for the decision at hand. The alternatives presented in the 2004 Draft EIS and the 2006 and 2010 Supplemental Draft EISs represent a reasonable range of alternatives to meet the purpose and need of the project, as mandated by the National Environmental Policy Act (NEPA) and the State Environmental Policy Act (SEPA). Similarly, a reasonable range of construction approaches has been described and evaluated in these documents. The content and level of analysis conducted for these documents is adequate to inform the public and decision makers of the possible effects resulting from the project or from inaction.

Please see this Final EIS for discussion of impacts and proposed mitigation measures.

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B-003-001 indeed in some cases probably fatal, adverse impacts to those values throughout the period of construction of whatever alternative is ultimately selected. With some of the alternatives under consideration, those adverse impacts will be only somewhat moderated after construction is completed, as a result of the additional traffic that the project may permanently direct onto Alaskan Way. Thus, each of us submitting these comments is vitally concerned that the Environmental Impact Statement must fulfill its statutory requirements of providing complete information about environmental impacts before there is a commitment of resources to a course of action, and of ensuring that all reasonable alternatives that could achieve the project's objective at a lower environmental cost are fully considered.

Our financial investments have been very significant. Our commitments to the City and to the Waterfront are obvious, deep and true. The consequences to each of us derived from the fundamental defects we perceive in the DEIS, which we discuss below, could be profound, and calamitous.

B-003-002 **I. The DEIS is inadequate because it does not consider alternatives for construction.**

The most significant adverse impact of the project is its construction. All of the alternatives for the final product have positive outcomes. DEIS at 28. But, for the 7½ to 11 years it takes to build the replacement, the construction process will visit extraordinary adverse impacts on the construction area where our properties are located. Thus the EIS would be expected to focus most heavily on the impacts of construction, alternatives for the construction process to mitigate those impacts, and other mitigation that would lessen those impacts. Instead, the DEIS considers NO alternatives for construction, minimizes the extent of the impacts to businesses in the construction zone (while focusing extensively on the impacts to those who travel through the construction zone), and leaves the identification of any specific mitigation for the final EIS or subsequent permit actions.

The DEIS is required to describe reasonable alternatives "that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation." WAC 197-11-440(5). Far from doing so, the DEIS considers only the alternative of leaving at least two lanes of traffic in each direction on SR 99 open during most of the construction period. The DEIS acknowledges that this will lengthen the construction period, and thus the period of significant adverse impact. "One way to shorten construction may be to completely close SR 99 for several years." DEIS at 135. Nonetheless, it does nothing to present the impacts or the benefits of the most obvious construction alternative, which is to close SR 99 and permit traffic to find its own way on the numerous alternative routes through the area.

B-003-003 **II. The alternative of closing SR 99 must be analyzed and its impacts disclosed now, before the selection of the preferred alternative for the project.**

Analysis of the alternative of closing SR 99 must be considered now, before the preferred alternative for the actual project is chosen, because it may significantly affect the selection of the preferred alternative. If money were no object, the selection of the preferred alternative would

B-003-002

In response to comments such as this, the 2006 Supplemental Draft EIS evaluated three new construction approaches, including closing the SR 99 to through traffic, which present a range of construction durations. As the project evolved, an additional construction approach for Bored Tunnel Alternative was presented in the 2010 Supplemental Draft EIS.

The Final EIS provides information on construction of the preferred Bored Tunnel Alternative as well as the Cut-and-Cover Tunnel and Elevated Structure Alternatives, and how adverse effects can be minimized or mitigated. The information provided accurately describes potential impacts during construction for each of the three alternatives. The project design cannot be finalized until after the environmental process concludes.

B-003-003

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each

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B-003-003

be obvious, to the point of being non-debatable. Once built, the Tunnel Alternative (with the option of leaving the Elliott and Western ramps open) has far more benefits and fewer adverse effects than any other alternative. The primary impediment to selection of the Tunnel Alternative, however, is cost – a possibly insurmountable impediment. As the DEIS discloses, however, closing SR 99 for the duration of construction would not only make a huge difference in terms of time of construction and thus the extent of adverse impact on the businesses in the construction zone, but also potentially a huge difference in cost. Not only would the fly-over at Broad or Battery Street be unnecessary, but the construction site could be fully available to the contractor to build the project in the most efficient way possible. There would be no need to build first the southbound and then later the northbound lanes of the tunnel. It would be possible to reduce the number of times the contractor needed to work in the same area. Keeping SR 99 open during construction would assure that the contractor must confront the least favorable conditions possible, which will inevitably maximize the cost of the project. Thus, closing SR 99 may very well reduce the cost of the Tunnel Alternative enough to make it affordable. That is critical information now, not after the selection of the preferred alternative.

An alternative that closes SR 99 will presumably also have adverse impacts. It may be that when that alternative is fully explored, the decision will be to proceed with construction as the DEIS now assumes will occur. But, the purpose of an EIS is to explore and disclose the impacts of reasonable alternatives, so that the public and its elected officials can make fully informed decisions. Thus, the DEIS should address the impact of traffic relocation during a construction period which closes SR 99, and should identify strategies for mitigating such disruption. We believe that whatever adverse impacts occur to traffic if SR 99 is closed may be offset by a shorter construction schedule and a reduced construction budget, i.e., that there may not be a net adverse impact. However, the important point here is that the DEIS fails to examine this alternative and assess its ramifications.

B-003-004

III. The DEIS is inadequate because it does not adequately disclose the impacts of construction on the businesses and their employees and customers in the construction zone.

Throughout, the DEIS discloses a bias towards keeping traffic flowing and disregards the impacts on the businesses and residences in the construction zone. The DEIS identifies both the number of businesses, and the number of employees of the Ballard/Interbay/Northend Manufacturing Center and the Duwamish Manufacturing and Industrial Center. DEIS at 40. Nowhere, however, does it disclose the number of employees who work within a block of the construction zone, nor the number of people who live within a block of the construction zone, much less the total number of people who annually visit or recreate or shop within a block of the construction zone. Those are the people who will be subject to 24-hour impacts for months at a time, over many years, as “construction will pass by properties located in the construction zone more than once.” DEIS at 135. The DEIS says nothing about the impacts on employees of businesses or residents of the construction zone – although it discloses that noise will reach 83 dbA at 100 feet and 76 dbA at 200 feet from activities such as pile driving and jack hammering, that will occur during construction. The DEIS at most suggests that “the combination of . . .

alternative and its construction plan, and Chapter 6 describes construction effects.

B-003-004

The 2004 Draft EIS adequately describes construction conditions and the potential for adverse affects on local businesses. Factors determining failure or success of a business are very complex under any circumstance and it is impossible to predict specific project effects to businesses, such as probably business failure rate, without considerable speculation. While construction will be underway throughout the corridor, from the perspective of a individual business the level of activity will not be constant. Mitigation measures for businesses will be provided and are discussed in Chapter 8 of the Final EIS.

At this point in project development, there is no basis for predicting a vacancy rate during construction. The 2006 Supplemental Draft EIS expands upon this discussion by examining a range of construction approaches and the 2010 Supplemental Draft EIS describes an additional construction approach for the Bored Tunnel Alternative. The Final EIS describes current construction plans and sequencing. Coordination and outreach to businesses and residents in the project area will continue through the design and construction of the project.

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B-003-004 construction effects *could* cause people to avoid the waterfront, which *could* reduce business revenues.” DEIS at 149. That is an extraordinary understatement. There has been no study of the probable failure rate of businesses resulting from construction. Without such study it is impossible to give real numbers, but the EIS should have done such study, and had it done so, it would be required to disclose that the impact of the project may be 30-70% vacancy of buildings along the construction zone by completion. By failing to fully and adequately describe the impacts on the people whose lives and livelihoods depend upon the accessibility and desirability of the construction area, the DEIS provides no basis for analysis of the consequences of alternatives to the one construction process proposed.

B-003-005 **IV. The DEIS is inadequate because it provides no specific mitigation.**

Throughout the DEIS chapter on construction, the DEIS says that mitigation will be described in the final EIS, or at some even later point. See, e.g., “Additional information describing how SR 99 and Alaskan Way surface street will operate during construction will be presented in the Final EIS,” DEIS at 144; “A parking mitigation strategy will be included in the Final EIS,” DEIS at 145; “A specific plan incorporating the strategies [for minimizing traffic impacts] will be included in the Final EIS,” DEIS at 145; “[Noise] mitigation requirements would be defined in contractor specification and by the noise variance,” DEIS at 146; “Specific mitigation measures for affected businesses will be provided in the Final EIS,” DEIS at 150. A critical function of the EIS is to “discuss reasonable mitigation measures that would significantly mitigate these impacts.” WAC 197-11-440(6)(a). The discussion of mitigation must occur within the DEIS, so that the public has an opportunity to comment upon it. The final EIS should respond to those comments, not be the first opportunity for the public to review proposed mitigation.

B-003-006 **V. The DEIS is inadequate because it does not adequately disclose the impacts on the pedestrian environment in the North Waterfront area.**

Over the last 20 years public and private investment has created a major pedestrian promenade along what the DEIS describes as the “North Waterfront.” While the Central Waterfront is primarily tourist and ferry traffic oriented, the North Waterfront is used during the day and on weekends by thousands of primarily local residents for walking, jogging and similar recreation. The DEIS fails to recognize this, and thus completely ignores the impact of the proposed closure of the Elliott and Western ramps, which directs all permanent traffic from Ballard/Interbay onto Alaskan Way. The DEIS misses the impact on the pedestrian environment by apparently having only counted pedestrian usage in the winter, at the PM peak hour. DEIS, Appendix C at 105. Usage of the North Waterfront is primarily during the workday and on weekends, and primarily in spring, summer and fall. The EIS should contain data that discloses the actual use, at the peak periods for pedestrian use, and then should analyze the impact of pouring additional traffic onto Alaskan Way on such pedestrian uses.

The DEIS simply assumes the existence of the tunnel under the Seattle Art Museum’s Olympic Sculpture Park – never disclosing the significant adverse impacts of that tunnel on the Sculpture Park and the entrance to Myrtle Edwards Park, or its effect of quadrupling traffic on Alaskan

B-003-005

Mitigation measures for the preferred alternative, consistent with those described in in the 2004 Draft EIS and 2006 and 2010 Supplemental Draft EISs, are described in further detail in Chapter 8 of the Final EIS. Further, the lead agencies have provided information on mitigation as it has been developed through on-going public meetings and coordination.

B-003-006

We appreciate your concerns regarding pedestrian access in the north waterfront area. Updated pedestrian volumes were collected by video along the Alaskan Way surface street in downtown Seattle in 2006. The purpose of these counts was to quantify pedestrian activity in the summer season along the waterfront for use by the project team in assessing transportation conditions, developing mitigation programs, completing a Final EIS and furthering project design. To account for pedestrian volumes in the north waterfront area, a count station was located at Pier 66. Data collected for this effort confirms that pedestrian activity on the waterfront promenade is substantially higher in the summer, particularly during summer weekends. The updated pedestrian counts have been included in the Final EIS.

B-003-006 Way along the North Waterfront. Then the DEIS assumes that the primary – indeed the only – adverse impact on the pedestrian environment will come from changing the “look” of an area, and completely ignores the impact on the pedestrian environment of quadrupling the amount of adjacent traffic. “One of the main concerns with the Alaskan Way Viaduct and Seawall Replacement Project is how new structures and facilities might change the *look* of the different areas near the corridor, and how changes to that *look* might affect people’s experience in the area.” DEIS at 43. Of course, experience teaches that a quadrupling of traffic has a profound impact on the pedestrian environment. From the disclosure, at 39, that 33,500 vehicles daily use the Elliott and Western ramps, and the statement that there are currently about 9,000 vehicles on Alaskan Way at the Central Waterfront, one can surmise that closure of the Elliott and Western ramps and direction of their traffic onto Alaskan Way will more than quadruple the traffic on the North Waterfront; yet the DEIS never states any of this. Nor does the DEIS provide any justification for closure of the Elliott and Western ramps. Leaving them open is simply stated as an “option.” The DEIS must be supplemented to fully explain and analyze the basis for the decision to close the Elliott and Western ramps, and to disclose the impact of the alternative.

VI. A Draft Supplemental EIS is Essential.

B-003-007 These are flaws in the DEIS which cannot simply be rectified by the Final EIS. One of SEPA’s functions is to allow the public to comment on the proposal before the public decision-makers. The information that is missing here is fundamental to the decisions that must be made, and the public should not lose its right to comment because of the inadequacy of the DEIS.

In summary, we believe the DEIS is inadequate and requires supplementation because:

- (a) It fails to consider any alternatives for the construction process, particularly the obvious alternative of closing SR 99 to shorten and reduce the cost of the project construction.
- (b) By failing to consider alternatives now that would shorten and reduce the cost of the construction process, the DEIS prejudices the selection of the preferred alternative by a misleading inflation of the cost of the Tunnel Alternative.
- (c) The DEIS does not disclose the impacts of construction on the people who must live and work in its midst; the DEIS does a disservice to thousands of people who must live through years of disruptions by saying nothing more than this “could” drive customers away.
- (d) **B-003-008** The DEIS fails in its obligation to disclose mitigation that may reduce the primary adverse impacts of the project; it is simply not good enough to disclose potential mitigation later.
- (e) **B-003-009** The DEIS fails to adequately describe the impacts of additional traffic on Alaskan Way from the closure of the Elliott and Western ramps and the assumed Broad Street tunnel.

B-003-007

As discussed in B-003-003, the 2006 Supplemental Draft EIS was prepared, in part, to more fully evaluate construction effects. Chapter 7, Question 16 of the 2006 Supplemental Draft EIS presents the expected effects to the local and regional economy during construction. In addition, the Economics Technical Memorandum (Appendix P of the 2006 Supplemental Draft EIS) describes the effects associated with displacement of customers from the construction corridor. Since that time, the alternatives and the construction approach for each of the alternatives have been refined. Details about the Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure construction plans are presented in Chapter 6 of the Final EIS.

B-003-008

A range of reasonable mitigation measures were presented in the 2004 Draft EIS and updated in the 2006 and 2010 Supplemental Draft EISs. These mitigation measures have been developed in more detail and are discussed in Chapter 8 of this Final EIS.

B-003-009

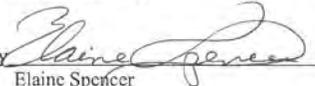
After the 2004 Draft EIS was published, your comments along with others led to additional analysis and revised alternatives presented in the 2006 and 2010 Supplemental Draft EISs. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for the current information and additional traffic analysis.

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B-003-010

The DEIS must be supplemented to address these issues. Only a supplemental Draft EIS, not simply providing the information in the Final EIS, will fulfill the requirements of SEPA. Alternatives to construction will have different impacts on different people and businesses, as an alternative that reduces the adverse impact on those in the construction zone may increase the impact on others who simply travel through it and would need to find alternative routes if it were closed. The public is entitled to comment on these differing impacts, and only by supplementing the DEIS will that be possible.

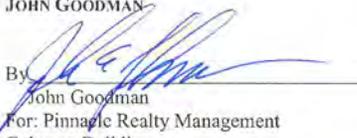
GRAHAM & DUNN PC

By 
Elaine Spencer
David G. Hancock

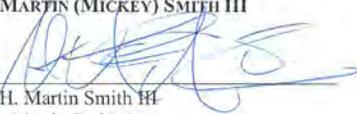
FREDERICK W. GRIMM

By 
Frederick W. Grimm
For: Triad Development
Triad Pier 70 LLC
Skyway Luggage Building

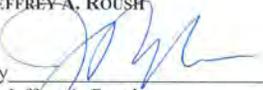
JOHN GOODMAN

By 
John Goodman
For: Pinnacle Realty Management
Coleman Building
Northwest Work Lofts Building
OK Hotel Building

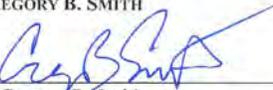
H. MARTIN (MICKEY) SMITH III

By 
H. Martin Smith III
For: Martin Smith Inc
MSI 83 King LLC
Piers 55 & 56 LLC

JEFFREY A. ROUSH

By 
Jeffrey A. Roush
For: Martin Smith Inc
2601 Elliott LLC
MSI Provident LLC
1201 Western Ave. Bldg.

GREGORY B. SMITH

By 
Gregory B. Smith
For: Gregory Broderick Smith Real Estate
MSI Triangle LLC
MSI Railroad LLC
542 First Ave LLC

B-003-010

Since this comment was submitted, the project has published two Supplemental Draft EISs. The Supplemental Draft EIS published in July 2006 addressed additions to the project north of Battery Street Tunnel, modifications to the alternatives, and additional construction approaches. The Supplemental Draft EIS published in October 2010 addressed the permanent and construction effects of the Bored Tunnel Alternative.

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June 1, 2004
Page 7

MARTIN SELIG

By 

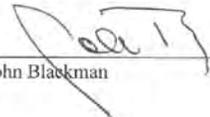
Martin Selig
For: Martin Selig Real Estate
Airborne Building
3131 Elliott Avenue Building
Elliott Bay Office Park
Third & Broad Building

MITHUN, INC.

By 

Bruce Williams, *Vice President*

ARGOSY CRUISES

By 

John Blackman

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Jon Diamond

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JUN 01 2004
AWWSP Team Office

Jill R. Mackie
Director of External Affairs

May 27, 2004

Allison Ray
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

RE: Seattle Times Company comments on the SR-99 Alaska Way Viaduct and Seawall Replacement Draft Environmental Impact Statement (EIS)

Dear Ms. Ray:

Thank you for the opportunity to comment on the SR-99 Alaska Way Viaduct and Seawall Replacement Draft EIS. The Seattle Times Company has reviewed the Draft EIS and has identified a specific concern relating to the options being considered for a "lowered Aurora." Specifically, the "lowered Aurora" option would construct an overpass on a number of east-west streets including Thomas Street.

The Seattle Times Company operates a newspaper publishing, production and circulation facility that fronts on Thomas Street between Boren and Fairview. This is a 24 hour per day operation involving continual loading and unloading of trucks of all sizes. Many of these deliveries involve semi-trucks with trailers, which back into the Seattle Times facility and block portions of Thomas during their unloading cycle. There is no practical alternative for movement of these operations away from Thomas except to consider another location.

B-004-001 The Seattle Times Company is concerned that the construction of a Thomas Street Overpass at Aurora will create a greatly heightened use of Thomas between Aurora and Fairview/Eastlake. Indeed, we understand the purpose of this overpass alternative is to direct traffic on to these east-west streets. This heightened use would be very detrimental to the Seattle Times Company's ability to continue production and circulation activities at the Thomas location. We believe elimination of the Thomas Overpass with an emphasis on converting Harrison Street to an east-west feeder would be greatly preferable.

1120 John Street, Seattle, WA 98109 • P.O. Box 70, Seattle, WA 98111
seattletimes.com

B-004-001

After the 2004 Draft EIS was published, your comments along with others led to additional planning, analysis, and the revised alternatives presented in the 2006 Supplemental Draft EIS. Following publication of the 2006 Supplemental Draft EIS, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the No Build, Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS.

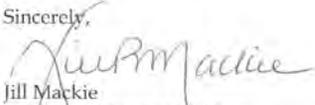
The Bored Tunnel connects Thomas Street in a different manner than was proposed in 2004. Please refer to Chapters 3 and 5 of the Final EIS for current information. Details on transportation can be found in Appendix C of the Final EIS.

Allison Ray
May 27, 2004
Page #2

The Seattle Times Company would urge the project team to consider the extremely negative impact a Thomas Street Overpass would have on the operation of our Thomas Street facility.

Thank you for your consideration.

Sincerely,



Jill Mackie
Director of External Affairs
JM/sja

cc: Carolyn Kelly, Seattle Times President and COO
Frank Paiva, Seattle Times Vice President of Operations
Eric Tweit, City of Seattle, Department of Transportation

FORTUNE TERMINAL ASSOCIATES, LLC
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May 25, 2004

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JUN 02 2004
AWWSP Team Office

Allison Ray
Alaskan Way Viaduct and
Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Allison:

Viaduct DEIS Comments
Fortune Truck Terminal
84 South Atlantic Street
Seattle, WA

Fortune Terminal Associates is the owner of the property referenced near the intersection of Atlantic Street and First Avenue South.

We appreciate the opportunity to comment on the Draft Environmental Impact Statement for improvements to the Viaduct.

We are extremely concerned that Viaduct improvements may have an adverse impact on the viability of this property. The industrial area in general has been subjected to a number of public uses and condemnations that have reduced the viability of this area already. (Harbor Island, Safeco Field, Metro on Sixth Avenue South, Sound Transit Maintenance Facility, Atlantic Street - Fourth Avenue Interchange.) When will Public Issues begin to protect this prime economic generator instead of continually reducing its economic vitality?

Therefore, we respectfully request your consideration of the following issues:

Local Access on S. Atlantic St.

The proposed interchange with SR-519 at S. Atlantic St. and Royal Brougham Way S. appears to pose a number of burdens on adjacent properties. In the case of the surface interchange options, the interchange takes a substantial amount of Fortune Terminal's property, including its warehouse building. In the case of the elevated options, the interchange appears to eliminate or severely restrict access to the block and to the Fortune Truck Terminal Building. It is not clear from the DEIS how local access would occur from S. Atlantic, Royal Brougham or S. Colorado.

(VIAD05252004)

B-005-001

The S. Holgate Street to S. King Street Viaduct Replacement Project became a separate project in 2007 and includes the intersection at S. Atlantic Street. Construction of the S. Holgate Street to S. King Street Viaduct Replacement Project began in July 2010. WSDOT also completed the SR 519 S. Seattle Intermodal Access - Royal Brougham project in June 2010.

For updated information and alternative descriptions for the Alaskan Way Viaduct Replacement Project, please see Chapter 3 of the Final EIS. Traffic analysis, including the S. Royal Brougham Way intersection, is discussed in Chapter 5 of the Final EIS.

B-005-001

B-005-001

Surface options would widen S. Atlantic Street and would place a new road across Fortune Terminal's property. Instead, might there be an option to consolidate the interchange at Royal Brougham Way, or at least alter the new road's alignment to minimize property takings?

B-005-002

Elevated interchange options do not clearly indicate how long the ramps would be or where they would come down to the street. Based on the DEIS's limited information about ramp grades, it appears highly likely that the ramps on S. Atlantic Street would block Utah Street. Furthermore, the ramp structure may also eliminate Fortune Truck Terminal's driveway access to S. Atlantic St. More broadly, it is not clear how local access to this block is maintained under the elevated options for the Rebuild, Tunnel and By-Pass Tunnel alternatives. This is particularly important since the elevated options eliminate the eastbound left-turn from S. Atlantic to 1st Ave. S. in four out of the five alternatives. Without better information about proposed local access patterns, the left-turn prohibition appears very restrictive for adjacent property access.

B-005-003

Parking

All of the alternatives eliminate on-street parking on S. Atlantic Street. The DEIS states that some replacement parking may be provided on the west side of Alaskan Way but leaves the matter far from certain. What is the chance that this loss will not be mitigated? What other options exist to mitigate the complete loss of on-street on S. Atlantic St.?

B-005-004

SR-519 Interchange

The proposed interchange clearly anticipates that the originally planned SR-519 1-way couplet will be in place. Yet there is no certainty that that project will be completed. If it may not be completed, then the purpose of the split interchange on SR-99 is questionable.

The elevated options create four new intersections between 1st Ave. S. and S. Alaskan Way. This seems extremely busy, even redundant, especially when elevated which creates a massive amount of overhead structure. To maintain local access and provide a better interchange, additional options should be addressed, which could include:

1. An aerial connection to SR-519. The proposed interchange results in the odd and potentially disorienting effect of taking traffic up to the interchange, then down to 1st Avenue, then up again on SR-519. Highway to highway traffic could be separated from local traffic.

B-005-002

The interchange and ramp configuration at S. Atlantic Street and S. Royal Brougham Way has been revised since the publication of the 2004 Draft EIS. The project plans to maintain S. Atlantic Street at-grade and provide an eastbound left turn to First Avenue S. Please see the Final EIS for a current description of the proposed alternatives.

B-005-003

Please see the Final EIS and Appendix C, Transportation Discipline Report, for current information about parking. Mitigation measures are described in Chapter 8 of the Final EIS.

B-005-004

WSDOT completed the SR 519 S. Seattle Intermodal Access - Royal Brougham project in June 2010. Please see the Final EIS for current information about the configurations of the proposed alternatives.

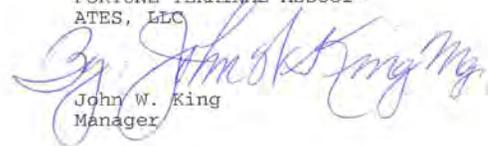
B-005-004

2. Alternate locations for ramps and surface street access.
3. A below-grade interchange instead of an aerial interchange. This would shorten ramp distances which would improve local access and significantly reduce the amount of aerial structure. While water table issues may well be of concern, it seems reasonable to assess this option for its costs and benefits and compare it to the proposed alternatives.
4. A single-point intersection or other configurations for the interchange that would minimize ramping on streets in order to preserve local access and reduce the amount of elevated structure.
5. As noted above, consolidate a surface interchange at Royal Brougham Way?

Please review and consider alternatives to these issues that we have raised.

Your consideration and review is most appreciated.

Sincerely yours,
FORTUNE TERMINAL ASSOCI-
ATES, LLC



John W. King
Manager

JWK:jwk
Cc: TDA, Inc.



May 25, 2004

Allison Ray
WSDOT Environmental Coordinator
Alaskan Way Viaduct and Seawall Replacement Project
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Ray,

We appreciate the opportunity to submit comments in connection with the Construction Impacts and Mitigations of the Viaduct and Seawall Replacement Project.

McKinnon Furniture is a locally owned and operated company started in 1990 and employing 29 people in the Seattle area with revenues in excess of \$3,000,000 per year. We are currently located at 1015 Western Avenue but we will be moving to a new space in September at 1201 Western Avenue in which we will occupy over 11,000 square feet. Our staff and revenues will grow accordingly. We are one of many businesses who will be directly affected by this project.

The two major areas of concern, regardless of the replacement project ultimately selected, are parking and accessibility.

Parking is already a problem in our neighborhood and will become a truly critical issue regardless of the replacement project ultimately selected. If not fully addressed, customers will avoid the neighborhood and take their business to the suburbs.

- It is important that when meters are removed to accommodate construction, that they are replaced elsewhere, including in lots if necessary.
- We would also suggest a program of some free parking, such as two hours in certain lots.
- It is equally important to have an adequate budget for promotions of the neighborhood, coupons for free parking redeemable at merchants, and for marketing the parking program.

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SEATTLE, WA 98108
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www.mckinnonfurniture.com

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AWSP Team Office

B-006-001

B-006-001

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide frequent parking updates
- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

Allison Ray
WSDOT Environmental Coordinator
March 25, 2004
Page Two

B-006-002

Accessibility is the second issue. If parking is available but traffic is still impeded, people will shop elsewhere. Even the perception that the area is hard to reach will keep customers away. Therefore, it is important to keep traffic flowing and to again have a budget to aggressively promote this fact.

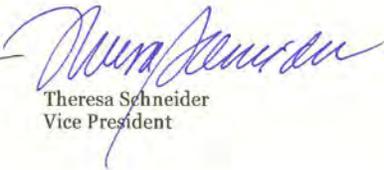
We are more than willing to work with you if you want feedback on the best way to address these critical issues. The livelihoods of a number of businesses and employees depend on how these issues are addressed.

Thank you for your consideration.

Regards,



Sheila McKinnon
President



Theresa Schneider
Vice President

B-006-002

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.



1015 Western Avenue
Seattle, WA 98104

May 27, 2004

Allison Ray
WSDOT Environmental Coordinator
Alaskan Way Viaduct and Seawall Replacement Project
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Ray,

The Western Avenue Merchants Association was created in 2001 in an effort to represent the interests of the home furnishings businesses in the area between Yesler and Battery Streets and Western Avenue and Second Avenue. We represent 20 companies who will be directly affected by the Viaduct and Seawall Replacement Project. We appreciate the opportunity to submit comments.

The two major areas of concern to our members, regardless of the replacement project ultimately selected, are the availability of parking and accessibility to the neighborhood.

Parking is already a significant issue in our neighborhood and will become a truly critical one regardless of the replacement project ultimately selected. If not fully addressed, customers will simply avoid the neighborhood and take their business to the suburbs.

- It is important that when meters are removed to accommodate construction, that they are replaced elsewhere, including in lots if necessary.
- We would also suggest a program of some free parking, such as two hours in certain lots.
- It is equally important to have an adequate budget for promotions of the neighborhood, coupons for free parking redeemable at merchants, and for marketing the parking program.

RECEIVED
JUN 01 2004
AWSP Team Office

B-007-001

B-007-001

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
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- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

Allison Ray
WSDOT Environmental Coordinator
March 27, 2004
Page Two

B-007-002

Accessibility is the second issue requiring full consideration. If parking is available but traffic is restricted, we will lose our customers. Even the perception that the area is hard to reach will keep customers away. Therefore, it is important to keep traffic flowing and to again have an adequate budget to aggressively promote accessibility.

The businesses of the Western Avenue Merchants Association would be more than willing to work with you to provide feedback on the best way to address these issues that are critical to our survival. The livelihoods of a number of businesses and employees depend on how these issues are addressed.

Thank you for your consideration.

Regards,



Theresa Schneider
President, Western Avenue Merchants Association

Member Companies:

Continental Furniture
Thomasville Home Furnishings of Puget Sound
It's Gotta Go
La-Z-Boy Comfort Center
Ligne Roset
Mandarin Asian Antiques
Inform Interiors
Swedish Heirlooms
McKinnon Furniture
Brasswoods Furniture
Deep Interior
LaBrash Fine Oriental Carpets
Modele's Consignment Home Furnishings
Driscoll Robbins
Big People Toys Asian Antiques
Arte Forma Designs
Mitchell Gold @ HOUSE
Dania
Fine Furniture Gallery
Iron Design Center

B-007-002

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.



June 8, 2003

RECEIVED
JUN 08 2004
AWSP Team Office

Ms. Allison Ray
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, Washington 98104

Re: Comments of the Draft Environmental Impact Statement for the SR99
Alaskan Way Viaduct and Seawall Replacement Project

Dear Ms. Ray:

The Seattle Mariners have reviewed the Draft Environmental Impact Statement for the SR99 Alaskan Way Viaduct and Seawall Replacement Project and submit the following comments on behalf of the 3 million baseball fans that attend baseball games and other major events at Safeco Field each year.

Opportunity for Input

B-008-001

The Seattle Mariners appreciate the opportunity to comment on the Draft Environmental Impact Statement for the Alaskan Way Viaduct and Seawall Replacement Project. As a major event venue less than 500 feet from the proposed Royal Brougham ramps, and less than 1000 feet from the Atlantic Street ramps, we request a joint review of the proposed on/off ramp interchange prior to further design or development of that complex. We also request the opportunity to create an agreement between the project and the Mariners to memorialize the understanding of the operation of the road, the operation of the ballpark and the mitigation measures that will be taken to ensure the operational viability of Safeco Field during construction and after completion.

B-008-002

On-Off Ramp Complex

A major issue that needs to be addressed relates to the apparent lack of any alternative to the south end on/off ramp interchange that is proposed throughout all five project alternatives. The on-off ramp interchanges at Atlantic and Royal



P.O. BOX 4100 · SEATTLE, WA 98194 · 206.346.4000 · WWW.SEATTLEMARINERS.COM

B-008-001

Thank you for your continued involvement in the project. The project team has continued to work with the Seattle Mariners and the public as the project design has evolved. Please also see the responses to your letter on the 2010 Supplemental Draft EIS.

B-008-002

In June 2010, WSDOT completed the SR 519 S. Seattle Intermodal Access - Royal Brougham Project, which improved mobility and pedestrian safety around SR 519. That project addressed some of the concerns raised in this comment. The construction of the S. Atlantic Street intersection is now part of the S. Holgate Street to S. King Street Viaduct Replacement Project. This project began construction in the summer of 2010. Please see the Final EIS for current information on the ramp configurations in the south project area.

B-008-002

Brougham represent the single most significant change in the SR99 roadway in the south end. Historically, Seattle has been opposed to creating a cross-town connection between SR99 and I5/I90 near downtown. While the connection that would be created is not a freeway, the net effect of having ramps at this location, when viewed in conjunction with the recently completed SR519 Atlantic Street ramp, could be to increase traffic and traffic speeds in what is already a very congested pedestrian environment on event days at Safeco Field. Pedestrian safety is an important issue for the Mariners.

B-008-003

We suggest consideration of an alternative on-off ramp interchange, or a split on-off ramp which would place half of the proposed complex further south. Massachusetts Street should be seriously considered.

Construction Phase Issues

B-008-004

Conditions during construction which may have adverse impacts on Safeco Field which were not adequately addressed in the DEIS include light/glare, noise, vibration, access, safety, congestion and dust.

Light/Glare: Depending upon the time of year that work is undertaken near the ballpark the type of lighting used and its placement at the worksite could result in some spillage and glare into the ballpark. This problem could be mitigated by maintaining direct contact with the Mariners and providing lighting previews whenever worksite lighting is moved to a new location or is redirected.

B-008-005

Noise: During a baseball game noise from the ballpark may or may not exceed noise levels from the project site. For non-baseball events noise from the worksite would probably exceed noise levels for the majority of non-baseball events at the ballpark. In the case of office-occupancy and retail areas along First Avenue noise from the worksite could be problematic. An overriding, monotonous noise of a pile driver could be disruptive to the concentration of players on the field. In the DEIS a suggestion was made that an oscillating system may be used as an alternative to traditional piledriving techniques. That technique was used next to Safeco field during the construction of the SR519 overpass, proved to be very acceptable to the Mariners, and should be considered for the SR99 project.

Vibration: Vibration caused by a pile driving technique would be of concern because of the cumulative effects on ballpark equipment and building integrity. Vibration could be a significant concern for the integrity of the ballpark retractable roof. This issue needs to be adequately studied prior to any work commencing and if it is proven that vibration would be felt in the ballpark adequate measures must be taken by the project to mitigate the problem.

B-008-006

Access: There are two areas of concern with access, pedestrian access and vehicular access. Safeco Field draws approximately 3 million visitors to baseball

B-008-003

A Massachusetts Street interchange was examined during the original screening process as both a stand-alone interchange and as part of an integrated system. The main reasons for not pursuing an interchange at Massachusetts Street include the following:

- The SIG railyard is located between SR 99 and Colorado Street.
- There is a need for a more significant aerial structure (due to the railyard).
- High costs are associated with potential right-of-way and/or rail track relocation.
- It would provide a less direct connection to/from SR 519.

This location is within the S. Holgate Street to S. King Street Viaduct Replacement Project boundaries.

B-008-004

Construction will include coordination with adjacent businesses and residents, such as the Seattle Mariners, to ensure mitigation of construction impacts. Light and glare effects on Safeco Field are likely only if high intensity lighting is located on very high supports. This potential impact can be mitigated by designing construction lighting at an intensity and elevation that will ensure no spillover to seating and playing areas.

B-008-005

Please see Chapter 6 of the Final EIS and Appendix B, Alternatives Description and Construction Methods Discipline Report, for current information on the construction plan for each alternative. No pile driving is currently planned in the vicinity of Safeco Field.

The City of Seattle Department of Planning and Development typically

B-008-006

games each year, plus additional visitors to other public and private events. A fullhouse game represents approximately 14,400 cars coming into the area. According to Washington State Ferries, 3,000 to 5,000 ferry riders' come to each game. Metro to the Mariners provides bus service to approximately 1900 people per game, plus an equal number of riders on regular route service. Charter buses bring greatly varying numbers of fans, but on average approximately 1000 people arrive by charter bus. Sounder Commuter rail brings between 1,000 and 2,000 passengers on Sundays only.

When Safeco Field was developed several conditions were placed on the development. The ballpark was required to provide 3909 onsite or covenanted parking spaces. The City encourages fans to use parking inventory in the CBD and walk to the ballpark. Over 20,000 people walk from the CBD to each full house game, using all available north-south streets. Several of the north-south streets have very narrow sidewalks, consequently the loss of any sidewalk space could create a significant hazard to pedestrians, especially when taken in the context of the additional surface street traffic that is anticipated during construction. The DEIS did not address the issue of pedestrian access to the ballpark from Colman Dock, nor from the CBD.

B-008-007

With regard to vehicular traffic there is concern that the additional congestion anticipated to occur on First Avenue and Fourth Avenue will have a negative impact on the ballpark. This type of impact was previewed after the Nisqually earthquake when traffic backups doubled from the pre-earthquake norm. During construction the competition for road space will increase between fans going to baseball games and commuters going home. This was not discussed in the DEIS. In fact there was virtually no discussion of ballpark traffic issues. That is a major omission when the impacts will be felt no less than 81 times per year.

B-008-008

The second issue with vehicular traffic is the loss of parking in the area. A reduced parking inventory will drive up the price for parking both in the CBD and the miscellaneous parking lots south of Safeco Field. This will impact fans at the lower end of the economic spectrum that rely on low- or no-cost parking to bring their families to baseball games.

B-008-009

A thorough discussion of access needs to occur and agreements reached as to how increased traffic, loss of parking inventory, increased parking costs and additional transit costs will be mitigated, and how adequate and safe pedestrian access will be provided.

B-008-010

Dust: The DEIS identifies dust as a significant issue during construction. Ballpark equipment will potentially be affected by excessive dust. Enjoyment of the fans, even their willingness to attend games in an outdoor venue, could be adversely impacted by fugitive dust. There is no particular discussion of how dust will be controlled during the project. A specific discussion needs to occur between the Mariners and the project team regarding mitigation for the effects of

grants temporary noise variances to construction projects with nighttime work activities if there is no practical means to work within the City noise ordinance. The long duration and unique nature of the Alaskan Way Viaduct Project requires an extended noise variance from the City. Obtaining this type of variance involves a public hearing process that influences the final decisions and stipulations made by the City, which sets forth noise mitigation measures that the contractor is required to meet.

B-008-006

Pedestrian access will be maintained at all times during construction activities. At times, it will be necessary to reroute pedestrians using temporary facilities/detours, but these detours will be designed to minimize any inconvenience. Any sidewalk or the Marion Street pedestrian bridge that would be removed to accommodate construction activities will be replaced with a temporary facility in a nearby location that provides sufficient capacity to accommodate pedestrian demand.

B-008-007

Construction-related effects on traffic in the stadium area have been evaluated in greater detail since the release of the 2004 Draft EIS and are described in the Final EIS. Additionally, Chapter 8 of the Final EIS describes mitigation measures identified to assist in managing traffic during the construction period.

B-008-008

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number

B-008-010 | dust in the ballpark and potential impacts of dust on ballpark equipment and attendance.

B-008-011 | **Operational Phase Issues**

Light/Glare: Post construction light and glare issues are similar to those identified during construction. The placement and intensity of lighting on the replacement structure needs to be reviewed in the context of the seating bowl at Safeco Field to ensure that light/glare do not adversely impact the ballpark.

B-008-012 | Access: The comments in the DEIS regarding the proposed interchanges at Royal Brougham and at Atlantic all describe better access for fans going to baseball games. We question that assumption. The placement of an interchange at Royal Brougham and Atlantic will bring new traffic into close proximity of Safeco Field. At no time does the DEIS point out that access to the interchanges for the general traveling public will be significantly impeded by traffic going to or from baseball games. The description of the currently completed SR519 Phase I is inaccurate as it is on Atlantic Street, not on Royal Brougham as described. Baseball games will impact the proposed and existing interchanges no less than 81 times per year. Prior to making any final decision a thorough discussion needs to occur between the project team and the Mariners regarding how traffic will flow before and after ballpark events. Measures to mitigate new traffic impacts and any additional cost of traffic controls caused by the addition of ramps at these two locations will need to be identified and agreements reached regarding responsibility for additional ongoing costs during construction and after completion.

Safety: There is no discussion in the DEIS how the project intends to co-exist with the existing heavy pedestrian traffic going to events at Safeco Field once the SR99 interchanges are opened. For a significant period before and after games the sidewalks around and near the ballpark become congested with pedestrians. The current practice is to close Atlantic and Royal Brougham immediately after games to accommodate these conditions. There is no discussion in the DEIS how the project team envisions this practice continuing. There is no discussion in the DEIS to demonstrate a knowledge of the necessity for street closures and re-routes before, during and after baseball games and other major events at Safeco Field.

Between the opening of Safeco Field in July 1999, and end of the 2003 baseball season, **15,941,063 baseball fans have come to Safeco Field**. We ask that you step back and relook at the proposed ramp interchange in the context of the number of people who require safe and convenient access to Safeco Field. To this end, we urge consideration of Massachusetts Street as the location of the on/off ramp interchange in lieu of Royal Brougham.

of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide frequent parking updates
- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

B-008-009

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and

Thank you again for this opportunity to comment on behalf of baseball fans. We look forward to future opportunities to work with the project team on impacts, alternatives and mitigation measures related to Safeco Field. Our contact for the Seattle Mariners is Susan Ranf, Director of Transportation, (206) 346-4236.

Sincerely,



Clyde H. MacIver
Executive Vice President and
General Counsel

cc: Chuck Armstrong, President, Seattle Mariners
Washington Major League Baseball Stadium
State Public Facilities District
Steve Pierce, City of Seattle

mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

B-008-010

Mitigation measures for dust (particulate matter) are discussed in Chapter 8 of the Final EIS and Appendix M, Air Discipline Report. Measures include:

- Spraying exposed soil with water or other dust palliatives to reduce emissions of PM10 and deposition of particulate matter.
- Covering all trucks transporting materials, wetting materials in trucks, or providing adequate freeboard (space from the top of the material to the top of the truck) to reduce particulate emissions during transportation.
- Removing particulate matter deposited on paved public roads to reduce mud and resultant windblown dust on area roadways.

The lead agencies will continue coordination and mitigation activities with business, residential, and other affected groups as project construction moves forward.

B-008-011

Lighting, including the intensity and mounting elevation, on SR 99 will be designed to minimize impacts on adjacent uses, particularly Safeco and Qwest Fields. Specific coordination with Safeco Field will be undertaken to ensure that the seating areas are not substantially affected by glare from the roadway light sources.

B-008-012

In June 2010, WSDOT completed the SR 519 S. Seattle Intermodal Access - Royal Brougham Project, which improved mobility and

pedestrian safety, and addressed some of the concerns raised in this comment. Construction of the S. Atlantic Street intersection is now part of the S. Holgate Street to S. King Street Viaduct Replacement Project. This project began construction in the summer of 2010.

Pedestrian access will be maintained during construction of the Alaskan Way Viaduct Replacement Project, although temporary detours will be needed in some locations. Please see the Final EIS for current information on access, pedestrian safety, and mitigation measures.



make (mäk) vb 1 to bring into being by shaping or altering 2 to form in the mind, a judgment or plan 3 to put together by combining parts 4 to build, construct, formulate, devise, create 5 to prepare for use; arrange 6 to cause to happen

RECEIVED
MAY 13 2004
AWSP Team Office

May 12, 2004

Allison Ray
Environmental Coordinator
WA Dept. of Transportation
999 3rd Ave, Ste 2424
Seattle, WA 98104

Re: Potential Alternate Elevations and Routing for the Alaska Way Viaduct Replacement Tunnel Alternative

Dear Ms. Ray:

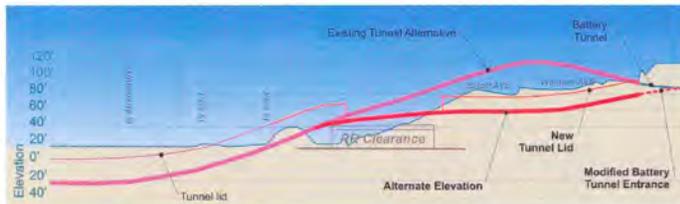
As a follow-up to participating in the City's Waterfront Charrette, the MAKERS + Friends team would like to draw your attention to two ideas regarding the Alaska Way Viaduct Tunnel Alternative:

1. An alternate elevation between Pike/Pine and the Battery Street Tunnel.
2. Routing the northbound lanes under Western Avenue.

Alternative Elevation between Pike/Pine and Battery Streets

In the existing Tunnel Alternative, SR 99 surfaces between Pike and Pine and continually increases in elevation to provide adequate clearance over the Railroad, Elliott, and Western Avenues.

Our team suggests tunneling underneath Elliott and Western Avenues rather than crossing these arterials as an elevated structure, as shown in the following illustration. (Our alternative would not affect the elevation gain required for Railroad clearance).



B-009-001

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1425 Fourth Avenue
Seattle, Washington 98101
phone/ 206.652.5080
fax/ 206.652.5079
e-mail/ makers@makersarch.com

B-009-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments related to a suggested undercrossing of Elliott and Western Avenues. Because the project has evolved since 2004, please see the current alternatives analyzed in the Final EIS.

May 12, 2004
Page 2

B-009-001

We believe tunneling under Elliot and Western Avenues better aligns with the City's Central Waterfront Plan goals and would provide the following advantages:

- Improve the visual and physical connection between downtown and the waterfront.
- Provide development opportunities on the blocks occupied by and adjacent to the existing and currently proposed elevated structure.
- Increase tax base revenues available to the City of Seattle.
- Improve driving conditions by decreasing the SR 99 road slope to 5% grade after railroad clearance

This option places SR 99 at a lower elevation at the Battery Street Tunnel entrance and would likely require reworking the portion of the tunnel between Battery Street and Second Avenue. Although this (and other potential issues) could increase this option's costs, we believe its potential advantages warrant its consideration.

B-009-002

Routing Northbound Lanes under Western Avenue

The Tunnel Alternative currently follows the approximate route of the existing Alaska Way Viaduct and will require closing the existing viaduct during some construction phases. As is illustrated, our team suggests placing the northbound lanes in a tunnel under Western Avenue, which has the potential to improve construction phasing, on- off-ramp alignment, and overall road slope.



B-009-002

The placement of the northbound lanes of SR 99 in a tunnel under Western Avenue and connecting to Battery Street Tunnel is not a viable alignment due to adverse effects to historic buildings, tight corners, and steep grades and therefore was not considered.

May 12, 2004
Page 3

B-009-002

Thank you for considering our suggestions to improve the Alaska Way Viaduct Tunnel Alternative. Do not hesitate to contact us if you need more information or would like to discuss this further.

Sincerely,



Julie Bassuk and Pietro Potestà
MAKERS + Friends, Seattle Central Waterfront Charrette Team 7

Cc: Bob Chandler, SDT Strategic Advisor
Steve Pearce, SDT Strategic Advisor
Barbara Wilson, Planning Commission Analyst
John Rahaim, DPD Executive Director
Robert Scully, DPD Urban Designer
Maureen Sullivan, WSDOT Project Manager



RONALD JACKSON
NORTHWEST DIVISION
General Director Transportation

The Burlington Northern
and Santa Fe Railway Company

2454 Occidental Ave South, Suite 1A
Seattle, Washington 98134

206 625-6333
Fax 206 625-6540
E-mail: Ronald.Jackson@BNSF.com

May 28, 2004

CERTIFIED MAIL 7001 1140 0000 0615 3771

Allison Ray
WSDOT Environmental Coordinator
AWV Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104
Via Email: awvdeiscomments@wsdot.wa.gov

RE: Alaskan Way Viaduct and Seawall Replacement Project

B-010-001

Burlington Northern and Santa Fe Railway Company (BNSF) has reviewed the Draft EIS prepared for the Alaskan Way Viaduct Project (AWV). Our comments are limited to the "South End" portion of the project between King and Spokane Streets.

BNSF has been working diligently with the AWV design team over several years to help make this project successful. Unfortunately, the Draft EIS inadequately addresses the impacts to freight rail operations. Neither the seriousness of the impacts nor any mitigation concepts to address them have been identified. The 24/7 BNSF freight operation cannot afford a reduction in our short-term or long-term functionality or capacity. For reasons explained below, BNSF cannot support any of the five alternatives presented in the DEIS and is very concerned with both the final impacts as well as the extended temporary impacts from construction.

An overall reconstruction of our Stacy Street and Whatcom Yards along with the Seattle International Gateway (SIG) creates an impact on our operations that cannot be overcome. A reduction in length or the elimination of the Stacy Street Yard Tail Track cripples our ability to receive, depart and handle our trains. Relocating the Tail Track to the south of our yard was evaluated by BNSF and has been determined to be unworkable for the same reasons.

The temporary impact durations to BNSF are so lengthy that they can not be accommodated. BNSF's rail infrastructure is very restricted in the Seattle area and provides no viable alternative for temporary relocation or other short term solutions to maintain our freight services. The closure of Whatcom Yard for construction or relocation is not acceptable because it would seriously cripple our ability to provide rail service to the Port.

Coordination with the Monorail project is essential at the south end of our SIG facility. Any reconfiguration of the Whatcom Yard connections to the south must be compatible with the alignment and pier placement of the Monorail. This should be a joint effort between the AWV and Monorail team. BNSF will work with both teams to ensure the appropriate design is developed and progressed.

BNSF recommends the development of a preferred alternative that supports freight mobility for the Port of Seattle and maintains functionality at the supporting BNSF facilities. A preferred "aerial" alternative that requires minimal Tail Track realignment, does not require temporary closure or the relocation of Whatcom Yard, and accommodates short and long-term freight handling between the Port and the BNSF facilities should be pursued. Any preferred "surface" alternative on the Whatcom Yard footprint would require the complete reconstruction of the yard before the existing yard could be closed. The north and south end connections of Whatcom Yard would have to be maintained in a similar configuration as they are today.

BNSF011.d28

B-010-001

Since the publication of the Draft EIS in 2004, the project has evolved. The "south end" portion of the project referred to in this comment letter is now part of the S. Holgate Street to S. King Street Viaduct Replacement Project. Construction of this project began in the summer of 2010. During the planning of the S. Holgate Street to S. King Street Viaduct Replacement Project, the lead agencies coordinated closely with BNSF to develop a design and construction approach that maximizes rail operations and minimizes effects to BNSF. Please see that project's Environmental Assessment, published in June 2008, and the Finding of No Significant Impacts (FONSI), published in February 2009, for more information.

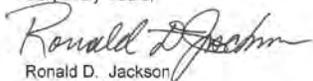
The lead agencies will continue to coordinate with BNSF on the Alaskan Way Viaduct Replacement Project construction as needed.

Allison Ray
May 28, 2004
Page 2

B-010-001 In any scenario the Tail Track will be potentially subjected to increased at-grade crossing activity by both vehicles and pedestrians. Careful attention must be exercised in progressing the design to ensure the complete separation of pedestrians from the Tail Track so that a serious safety condition is avoided.

BNSF will continue to work with the AWW design team until a preferred alternate is developed and selected that meets the needs of all of the stakeholders. Please contact Trent Hudak, Manager Engineering, at (206) 625-6150 to further discuss BNSF's comments.

Very Truly Yours,



Ronald D. Jackson
General Manager
Northwest Division

-----Original Message-----

From: Ralph Pease [mailto:RalphP@ARGOSYCRUISES.COM]
Sent: Wednesday, May 12, 2004 2:47 PM
To: 'awvdeiscomments@wsdot.wa.gov'
Cc: John Blackman; Duran Larsen
Subject: Viaduct & Seawall EIS comments

Sirs,

My compliments on the Draft EIS report for the five alternative solutions for the Viaduct and Seawall project. I appreciate the open approach and the opportunity to comment on it along the way.

B-011-001

Of the five alternatives Argosy is strongly apposed to the the Surface alternative due to pedestrian safety, the increased surface street congestion and long term impact on our business. Argosy supports the Tunnel option with Side-By Side Aerial around SR and ramps to Elliott/Western. But equally important to us is the length of time that construction work will impact the central waterfront. Particularly during the summer season. We strongly recommend and request that the work be phased in such a way to cause minimal disruption during this critical time of the year for our business.

B-011-002

Other important things to consider:

In the event that one of the two tunnel alternatives are chosen and built, a major concern of ours is the subsequent zoning of the area between Columbia and Pike, Western and Alaskan Way. The prospect of this area being approved for residential of any type, (except maybe large hotels), would be extremely detrimental to our business. Argosy carries over a half million passengers a year, occasionally operating with round-the-clock departures. Motorcoaches pick up and drop off many of these passengers early and late in the day and our deliveries are occasionally made 24 hours a day. Severe after hours noise restrictions would add greatly to our cost of operation and could force us out of business. As anyone who works on the waterfront can attest, the cars on the viaduct as it exist today are the primary noise generators. We are hardly noticed. With the viaduct eliminated we fear that there will be a powerful interest in building high end condominiums similar to those across from Pier 62 & 63. These would not only change the look and feel of the waterfront but also the businesses that could survive here.

B-011-004

Both during the construction and after please don't forget the water side of the waterfront and how this can lend itself to short and long term solutions such as the West Seattle Water Taxi or other water taxi applications. These can be quick to start up, flexible in operation and inexpensive by comparison to light rail, monorail, temporary bus service or road building alternatives. Particularly when multi-year agreements can be worked out. Argosy is currently operating the West Seattle Water Taxi for King County and as a partner in Aqua Express we intend to start a foot-passenger commuter service to Kingston this coming fall. Please let me know if there is anything along these lines that Argosy can be of service with.

Thank you,

Ralph Pease
V. P. of Operations
Argosy Cruises

1

B-011-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

B-011-002

Construction activities, especially viaduct demolition, along the central waterfront would interfere with access to businesses and properties adjacent to the project on either side of the right-of-way. The project team has met numerous times with the businesses in the central waterfront to prepare them for the upcoming construction and discuss a variety of mitigation measures. These mitigation measures are discussed in Chapter 8 of the Final EIS.

B-011-003

The 2004 Draft EIS, 2006 and 2010 Supplemental Draft EISs, and Final EIS acknowledge that the proposed project may result in opportunities for redevelopment created by removing the viaduct. This may occur under both the Bored Tunnel and Cut-and-Cover Tunnel Alternatives. It is also acknowledged that substantial changes would occur in the relationship between the waterfront and upland properties leading to the downtown core. To the extent that the existing viaduct has been perceived as a barrier to waterfront uses, new development on vacant or under-used property or redevelopment may take place around the new Alaskan Way surface street. However, no development within the existing viaduct right-of-way is proposed as part of the proposed project.

It is anticipated that any potential new development would be consistent with zoning designations for this area. Presently, most of this area is

within the City's DH2 (Downtown Harborfront), PMM 85 (Pike Market Mixed) and DMC 160 (Downtown Mixed Commercial) zones. Residential use is a permitted use in both the PMM and DMC zones, and limited residential uses currently occur in this area. Other permitted uses within these zones include a variety of retail, office, restaurant, and entertainment uses.

The proposed project, however, would be only one of a number of influences that will likely determine the exact mix of development that may take place in this area. The City is currently studying the waterfront area as part of its Central Waterfront planning efforts, and the results of these studies will also guide future uses there. Other important factors would include market and economic conditions which may, or may not, favor new residential development. If new residential development occurs, it will be required to comply with City land use and zoning regulations.

B-011-004

Thank you for your comment regarding the Water Taxi. The alternatives analyzed in the 2004 Draft EIS did not include items other than those directly related to replacement of the existing viaduct. Since the Draft EIS was published in 2004, the Water Taxi operations have been expanded and are now operated by King County.

June 1, 2004

AWV Project Office
Allison Ray
999 Third Avenue, Suite 2424
Seattle, Washington 98104

Dear Ms. Ray:

The dialog regarding the upcoming changes to the Seattle waterfront is encouraging. I applaud the City and all the partners for the effort that has gone into exploring options for a truly great central waterfront fitting for a city of Seattle's stature. This is a once in a century opportunity calling for a bold statement. Although funding is a challenge, lack of money is no excuse for doing the wrong thing. If there is political will there is a way. This opportunity for Seattle has come on our watch and we are the ones who will be to blame if we mess it up a second time. An attractive city where people want to live and work makes economic sense and is a good investment

B-012-001

The cut and cover tunnel, although a disappointment to me since it doesn't go far enough in creating a destination pedestrian space at the water and getting traffic past Belltown, is the best alternative. No additional surface traffic should be places on the Alaskan Way Corridor. Have you looked at all alternatives for reducing the traffic there? How much could actually be diverted to the freeway or other routes?

My excitement about the possibility of removing the Viaduct is diminished by the fact that it seems to be at the expense of Belltown. We do not want a raised viaduct into the Battery Street tunnel nor extra traffic on our streets especially Western and Elliott. The noise level at the Belltown P-Patch and Cottage Park is already so loud it interferes with programs in the park. Will the traffic pattern you project increase this noise level? If so, what mitigating measures do you propose?

The waterfront is Belltown's front yard. Getting to it is problematic right now. How much will the traffic on our north / south streets increase and what will you do to improve pedestrian safety when crossing these streets? Almost every street is a



B-012-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

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Seattle, Washington 98121
T 206.441.1440
F 206.448.7199
www.geise.net

Ray
June 1, 2004
Page 2

B-012-001

major pedestrian corridor to the waterfront connecting hundreds of people to their front yard and recreation area. It doesn't seem like the right thing to do to create more of a barrier to the waterfront than already exists. In fact, this project should improve the connection. Have you reviewed the Growing Vine Street Plan to see that the community has planned for a major pedestrian connection to the water at Vine Street? How will the proposed sea wall construction and traffic patterns impact or support this plan?

Getting the traffic into the Battery Street Tunnel is a design problem. We do not want an elevated structure that makes the situation worse than already exists. Did you notice that the Belltown Neighborhood Plan identifies the intersection of 1st and Battery as "view point"? Not only is there a view corridor to the water, but the amount of street area around and including the triangular piece of land which, I think, is owned by City light, amounts to nearly three acres. This amount of open space lets the sun into the heart of Belltown. Pedestrians should be able to flow pleasantly down to the waterfront from this location. What are the negative impacts of the tunnel entrance design on this view point and the pedestrian connection to the waterfront? How can they be mitigated?

Western Avenue will be the major pedestrian connection between the new Sculpture Park and the Pike Place Market. Hundreds of residential units front on this street and will use it daily. How will your plans for Western Avenue accommodate this increased pedestrian traffic considering both safety and the quality of the experience?

Remember, we will soon forget how much the project cost but we will live with the results for decades. Don't miss this once-in-a-lifetime opportunity by taking shortcuts that we will all regret for the rest of our lives.

Sincerely



Carolyn Geise, FAIA

May 28, 2004

Ms Allison Ray
Washington State Department of Transportation
999 Third Avenue South, Suite 2424
Seattle, WA 98104

Re: AWV/SR:99 Draft EIS - Comments

Dear Ms Ray:

The State of Washington and City of Seattle face enormous challenges in the years ahead with the redevelopment of the Alaska Way Viaduct and the related connections to the adjacent street grid. The AWV/SR:99 project is a hugely important development for the future of our region and the complexity of the proposed construction phasing and full redevelopment of the corridor is simply mind-boggling.

The three undersigned organizations represent just three of the many organizations that call Seattle Center home. Taken together, however, we draw over 10 million visitors to the Seattle Center campus each year. The majority of our visitors rely on the I-5 corridor and SR:99 to get to Seattle Center. It is therefore of keen interest to us collectively that proposals for modifications to these major traffic corridors are ones that have been fully studied to create more efficient traffic connections to the campus.

Because of the size and complexity of the AWV/SR:99 project it's possible that elements of the plan and its numerous alternatives may not have been as fully coordinated as you might have liked. However, we wanted to draw your attention to the following three specific topics that appear to have received less than adequate review: 1) traffic flows on a two-way Mercer from the I-5 corridor to First Avenue North; 2) traffic distribution around the perimeter of the Seattle Center campus with the elimination of Broad Street, and finally 3) the mitigation of traffic impacts during the construction of each phase of the overall project.

Two-way Mercer

We understand that responsibility for implementation of Mercer Street improvements is divided between the Mercer corridor study being handled by City of Seattle Department of Transportation and the AWV/SR:99 project. The component of the work under the auspices of AWV/SR:99 is a two-way Mercer Street from Dexter to Fifth Avenue North. The scope of work to be carried out by SDOT is Mercer Street from I-5 to Dexter. Apparently the study of traffic flows and impacts west of Fifth Avenue on Mercer Street is not yet within any agency's review. How will a two-way Mercer Street west of Fifth Avenue (two lanes eastbound and two lanes westbound) handle the traffic volumes that are currently handled by six lanes? Will signal wait times be increased? What volume of traffic will be handled by the proposed two-way Mercer and how does this compare to existing conditions?

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JUN 07 2004
AWSP Team Office

B-013-001

Since the publication of the Draft EIS in 2004, the project has evolved. The City of Seattle is leading separate projects to improve Mercer Street between Elliott Avenue W. and Fifth Avenue N. and from Dexter Avenue N. to I-5, which will accommodate two-way traffic. These improvements will coordinate roadway design and construction work with the City to improve Mercer Street between Fifth Avenue N. and Dexter Avenue N.

The Final EIS and Appendix C, Transportation Discipline Report, contain details about the current alternatives, traffic routes and detours during the construction period, and mitigation measures.

B-013-001

B-013-001

We understand from Seattle Center staff that testing and modeling of proposed traffic alternatives for a two-way Mercer will occur sometime this summer. We also understand that selection of the Preferred Alternative for AWV/SR:99 will also occur this summer. How can we be assured that analysis of impacts will be calculated and results integrated into the selection of the Preferred Alternative?

Traffic Distribution Around the Campus

Parking facilities for Seattle Center are distributed around the perimeter of the campus. This distribution of parking has been an intentional design effort to spread parking and congestion impacts around the full perimeter of the campus, not just at Mercer. Broad Street, despite its circuitous route at Valley, becomes an efficient distributor of traffic around the perimeter of the campus to reach parking. With the elimination of Broad Street in all of the AWV/SR:99 alternatives how will this distribution occur? What routes are suggested to replace Broad and what studies have been done to predict changes in travel times to reach all sectors around the campus? This could have a significant impact on our visitors trying to easily reach the Science Center, the Space Needle or KeyArena. Absent thorough consideration and satisfactory resolution of this issue, we urge that Broad St. be retained for service to the Seattle Center campus, no matter what Mercer alignment is selected.

B-013-002

Construction Phasing

The AWV/SR:99 DEIS indicates that the construction period for implementation of all improvements will take from 7.5 to 11 years, depending on the alternative selected. What are the likely impacts associated with traffic rerouting during this period and what sequence of construction phasing might provide the best mitigation for traffic? We know that a broad scale program of communication with our visitors will help this mitigation but we would like the benefit of knowing that every effort has been made to make this extended construction period as manageable as possible.

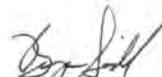
Sincerely,



Dean Nelson
Space Needle Corporation



Terry McLaughlin
The Seattle Sonics and Storm



Bryce Seidl
Pacific Science Center

Cc: Virginia Anderson

B-013-002

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.



May 26, 2004

Ms. Allison Ray
Alaska Way Viaduct & Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

RE: Comment on Draft EIS

Dear Ms. Ray,

As one of Washington's Top 100 companies and one that has maintained its headquarters here in Seattle for over 30 years, Shurgard Storage Centers is inherently tied to the economic development and general welfare of this great city and the surrounding region. We also happen to be on the "front line" of the proposed construction zone as our Pier 57 facility is located at the bottom of University Street (1334 Alaska Way), and will have an unobstructed view of the progress and impact of this project. For these reasons we have reviewed the Draft EIS for the Alaska Way Viaduct and Seawall Replacement Project generated by WSDOT, and would like to offer our comments regarding both the long- and short-term impacts of this project.

B-014-001 Evaluating the various options for this project with a long-term view, we would offer our most energetic support to the Tunnel Alternative. Like most, we believe a strong connection between the Central Business District/ Pike Place Market/ Pioneer Square districts and the Waterfront is critical to the long-term economic health of the city, and the removal of all aerial structures is critical to making this connection viable.

Furthermore, the noise and air pollution generated by the high-traffic volumes on the existing viaduct (as well as any future aerial structures) are detrimental to the physical health of all residents and visitors to the city and negatively impact Seattle's visual appeal, and we would support all efforts to direct as much traffic as possible underground.

Lastly, comparing the Tunnel Alternative to the Bypass Tunnel, it seems intuitive that lower traffic volumes on the Alaskan Way surface street are better for all of the reasons stated above, and so we would again voice our support for the Tunnel Alternative as the best of all options.

Regarding the short-term impacts, we have a specific concern regarding our Pier 57 Facility. That particular facility handles a significant amount of traffic via large semi-trucks and moving vans on a weekly, if not daily basis. These large vehicles approach our facility from the south, along the right-of-way just east of the existing viaduct, and are able to adequately access our store while parked parallel to the west face of our building. We would like to be informed by the Final EIS as to the measures your agency will be taking to ensure this access route to our facility remain accessible by large transport vehicles during the construction period.

We thank you for the opportunity to comment on this tremendous undertaking, and are eager to see this project move forward. This endeavor will greatly benefit our city and region, and we are glad to be in a position to contribute, even in this small way.

We look forward to reviewing the Final EIS regarding the above items as well as the final selection of the various alternatives. Please feel free to contact myself if you have any questions or comments.

Sincerely,

Stephen Bourne
Sr. Design Manager
Shurgard Storage Centers, Inc.
(206) 624-8100

RECEIVED
JUN 01 2004
AWWSP Team Office

Shurgard Storage
1155 Valley Street, Suite 400
P.O. Box 900933
Seattle, Washington 98109
Phone 206 624 8100
Fax 206 624 1645
www.shurgard.com

B-014-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.



RECEIVED
04 APR -9 AM 10:47
CITY OF SEATTLE
MAYOR'S OFFICE

April 7, 2004

Mayor's Office
Seattle City Hall
P.O. Box 94749
Seattle, WA 98124-4749

Dear Mayor Nichols:

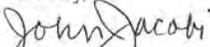
I read the detailed article in the April 1st edition of the *Seattle Times* about the potential solutions for replacing the Alaska Way Viaduct. The article outlined five different options. The last portion of the article said that you were interested in public comment about the options.

B-015-001

I am in favor of either of these options: by-passing Alaska Way or proposing a tunnel. In my opinion, any alternative options which create a barrier between the waterfront and the City should be avoided. This will probably be our only opportunity to do it right for current and future Seattle generations in a manner for which the City can always be proud.

By the way, the article stated that there are folks who claim they enjoy the view from the freeway and would hate to lose it. I'm sure that most would agree that creating a view for drivers should not be a serious consideration in the final decision making process. It's better to make sure that the whole City and its visitors benefit rather than the drivers.

Sincerely,


John W. Jacobi
Chairman

JWJ/drs

Windermere Services Company

5424 Sand Point Way NE • Seattle, WA 98105 • 206/527-3801 • Fax 206/526-7629 • E-mail wsc@windermere.com

B-015-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

As with many aspects of project planning and design, the lead agencies must balance the beneficial and negative of affects of alternatives for everyone in the project corridor, whether they are walking along the waterfront at street level, or traveling through on the viaduct above. Design and planning has and will continue to emphasize ways to make the alternatives fit in with surrounding neighborhoods, including minimizing potential effects both to views and to the overall aesthetic quality of areas within the project corridor.

Alaskan Way Viaduct and Seawall Replacement Project

CommentID: 4611 Form 238 CommentDate: 4/27/2004
 Daniel Ramras Organization: Triad
 Address: 2801 Alaskan City: Seattle State: Wa Zip: 98121

1. Choose Topic:

Overall	Tunnel *	Construction Impacts and
All of the	Bypass Tunnel	Other
Rebuild	Surface	
Aerial	Seawall	

Comment:

As the owner of 5 properties along the Alaskan Way corridor, including the Western & Denny Worklofts, Pier 70, Skyway luggage, a parking lot at Western & Seneca and the newly completed OK Hotel (a low income housing project), Triad is seriously concerned about the project impacts to our various properties and their respective tenants. Triad is generally in favor of the full tunnel option, with the caveat that the construction schedule is kept to an absolute minimum. We would be in favor of major traffic reorientation; i.e. most of 99 traffic shifting to I-5, to be able to complete the construction in the least amount of time. We are opposed to any form of the Broad Street Detour option, especially any option which includes a Broad Street overpass. This overpass would have serious impacts on traffic, shading and traffic. This overpass would be located within 20 feet from the front door of our streetside restaurant Rippe's and would reduce the visibility of the entry to our parking to almost zero. Nor are we in favor of the proposed SAM tunnel. This concept would seriously impact the traffic flow into and out of Pier 70 and would impact access by tenants and customers alike. I should note at this point, that the Broad Street overpass was not discussed in the numerous meetings over the last year and became an 'option' only at the 11th hour prior to the DEIS. The SAM tunnel also was also included in the DEIS but I was told repeatedly that this design was not a going to be considered. My main worry is that these last two items are mysterious and may or may not be considered in the final plan for the Viaduct/Seawall project. In addition, I have never participated in a public comment program that has appeared to be no more than a public forum for discussion with cookies. Is this process official?

B-016-001

B-016-001

Thank you for your comment and for stating your preference for the Tunnel Alternative. Some impacts to business access and traffic circulation are expected during the construction period, regardless of build alternative and the construction approach taken. Construction staging and phasing plans are continuing to be evaluated and strategies developed to balance the duration of construction with the level of access that can be maintained. Because the project has evolved since the publication of the 2004 Draft EIS, please see the Final EIS for current information.

The public hearings held during the 45-day comment period for the EISs for this project are part of the regulated environmental review process that the lead agencies must comply with per NEPA.



April 26, 2004

Alaskan Way Viaduct Draft EIS Response

Dear Ladies and Gentlemen,

B-017-001

In 1982, a small committee, of which I was a member, called the Waterfront Action Committee proposed removing the viaduct. This committee later became the public/private Seattle Waterfront BIA of which I chaired after Mr. Chuck Peterson. In this committee we researched the removal of the viaduct and the building of a tunnel under Alaskan Way. We decided to use Boston as a case study since they were at the time designing and building a tunnel similar to what we were proposing.

I went to Boston in the 80's to see the impact and the project of their underground waterfront tunnel. We concluded that a tunnel on the Seattle Waterfront would cost billions and that a surface alternative was more reasonable and affordable solution.

The viaduct is a safety hazard and not only a safety hazard from the standpoint of earthquakes. Tires from the upper level of the viaduct fly off all the time down onto the pedestrians below. You won't believe how these tires bounce any which way upon hitting the ground below. All sorts of items fly off the viaduct, including rocks, down onto the pedestrians below. I have observed a car straddled on the upper edge of the rail of the viaduct after a car accident. I fully expect a car to fly off the viaduct someday down onto the people below. On occasion windows of the adjacent buildings are shot at with 22 shots and bee-bee gunshots.

B-017-002

The proposed "Rebuild and Ariel Alt" does not eliminate the dangers of earthquake for this type of structure. The proposed structure has a fault. This area is fill land and beach.

The proposed structures in these alternatives only have pilings down to the top of the competent soils. This is insufficient for this area. Life safety structures in this area need structural piling all the way down to hard bedrock something these two proposals do not include. It has always been the case for the fill and beach area that in order to prevent sinking you need to build to bedrock for major structures. I am convinced that over time these kinds of viaduct structures which are being proposed do have a real risk of pan caking during major earthquakes and as they age. The structural load and strain is transferred horizontally creating the greatest strain at the column joint rather than the immediate load going directly to a vertical column as in the structure of most freeways today.

In San Francisco and Oakland these types of structure have failed at radical rates of destruction.

B-017-001

Thank you for sharing your history with the Seattle Waterfront BIA and safety concerns. Safety is a major part of the purpose and need of this project. A surface alternative was considered in the 2004 Draft EIS, but it was dropped because it did not provide sufficient capacity to meet the project's purpose.

B-017-002

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs. However, if the Elevated Structure Alternative is selected, it will be designed to the highest earthquake standards applied in the United States for a highway structure. The pilings supporting the structure will be supported by consolidated glacial till. The till is not only extremely competent but is not subject to liquefaction during an earthquake.

B-017-002

In other words you could spend all this money on a new viaduct and have it sink during the first major earthquake. In the long term, a new viaduct just creates the same structural problem we have today, which potentially can endanger the lives of many people in the future and cost the City of Seattle billions of dollars. I don't care which structural engineer suggests differently this area is earthquake prone, this area lies on fill and the proposed new viaduct structure is an inferior structure, which does not stand up to the test of time.

B-017-003

Today's viaduct is an eyesore for our beautiful City. It is also a physical barrier from the waterfront to the city. When they built the existing viaduct, Alaskan Way was an industrial area with many railroads underneath it. That is not the case today. The railroad is gone, the uses have changed, the safety of the people is a concern and the potential to beautify our city is enormous.

I strongly object to the proposed alternative's as stated in the draft EIS for "Rebuild and Ariel Alt" and I advise the committee not to select either of these proposals.

B-017-004

One very important item that is missing from all of the proposals is a path for light rail or monorail, rapid transit and/or a path for a subway. Without pointing fingers, it is easy to state that the lesser Seattle or Washington groups have hindered the development of a complete transit system that includes a rail system. Don't build it, they won't come mentality was completely wrong. First, they came anyway, and now our future growth problems will be internal from the people born here in the state.

This project area is a prime area for a direct route from Seattle to the Airport with rapid transit and it should not be forgotten at this time. A future development path needs to be included on the surface and the building of a subway needs to be included in the proposed tunnels with small stations located in key areas of the Seattle Waterfront and the ability to connect to a major transit network.

B-017-005

The surface alternative is an affordable and reasonable solution for the Seattle Waterfront. After the San Francisco earthquake which destroyed the use of their viaduct, I watched closely to the before and after of that area. That area turned out great for San Francisco and they didn't have the nightmares that Boston had with its waterfront tunnel.

Surface Alternative:

The area East of the existing right of way line. This 14'-16' depending on existing building location is proposed to be a sidewalk. This area is not owned by a government agency, it is fee simple land. It has much higher and greater use than a sidewalk. One can build up to 16 stories on this proposed sidewalk under current zoning. It is also the area that existing building can remodel in order to change the building's existing current exteriors and use in that area. This will allow for complete renovation and a new look for each property on the waterfront. This area should not be included in this viaduct project. It should be left for the owners and City of Seattle to determine what is best for that section of commercial land at a future date.

B-017-003

Your objections to the Rebuild and Aerial Alternatives are noted.

B-017-004

Although the Alaskan Way Viaduct Project does not make specific provisions for various transit modes, light rail and commuter rail opportunities are present in Seattle. Sound Transit's Central Link Light Rail system opened in 2009 and operates between Sea-Tac International Airport and downtown Seattle. Link light rail is scheduled to eventually be expanded to the north and east as funding becomes available. The light rail and some bus routes currently share the Downtown Seattle Transit Tunnel, which was built in the 1980s as a primary transit corridor through downtown. An additional, underground transit corridor in the downtown area is not planned at this time.

Sound Transit also operates Sounder commuter rail service through downtown Seattle on the BNSF tracks. Amtrak uses this same freight corridor to operate regional rail service.

B-017-005

As explained in the 2010 Supplemental Draft EIS and the Final EIS, the Surface Alternative does not meet the project's purpose and need to provide capacity to and through downtown Seattle; therefore, it was dropped from further consideration. The project has evolved since the publication of the Draft EIS in 2004. Please refer to the Final EIS for current information.

B-017-005

The proposed sidewalk next to the city buildings should commence immediately west of the "existing right of way line". In looking at the design there are at least two areas of luxury. Two bike paths of 6' are not needed. One bike path of 8' would be sufficient to handle the working and sporting needs of the people. The area just east of the streetcar, a total of 13', will be under utilized or not used at all. A 6' foot side is all that is needed here, if any at all.

B-017-006

Bypass Tunnel and Tunnel alternative:

Both proposals should include paths for a subway. The Tunnel alternative is a great alternative, but the structural support pilings need to go down to bedrock. This proposal is a matter of cost and durational impact on the City. Boston's waterfront Tunnel turned out to be a nightmare. So everyone needs to be on board and support the project. Mitigation damages for the neighboring area and businesses also needs to be addressed.

When the bus tunnel was built all of the retail businesses on 3rd Avenue went out of business. We have several home furnishing businesses on Western Avenue who will be impacted and the over the water pier businesses may or may not survive such a project.

B-017-007

The Port of Seattle may also be impacted by such a project, so construction phasing needs to be applied in order to create the least amount of impact. Sectional construction may be a solution to minimize the impact. Projects always cost more than expected so whatever number you think it will be, add 15% - 30% more and you will have the real number for this project. Government projects always seem to take much longer than planned also so add a couple of years to the timeline from commencement.

B-017-008

The viaduct is the State of Washington's Highway 99. The Dept. of Transportation in the 60's, 70's and 80's did not plan or build (when things were cheap) for growth in the State of Washington.

When the removal of the existing Highway 99 Viaduct occurs it is the responsibility of the State of Washington to replace their old highway with a new modern highway that fits the needs of the future and the surrounding areas. To refuse to plan for decades of growth in the State of Washington and to now tell the taxpayers of Seattle they have to pay for it is unacceptable. This is a state project. Perhaps surface roads can be viewed as city projects yet that only means that the state plans to ignore its responsibility in tearing down and replacing Highway 99 with a better design for modern and future times by providing for future transportation needs.

If the City of Seattle is forced to fund a significant part of this viaduct project, then I would ask that the Surface Alternative be selected.

Sincerely

Hugh H Holson Jr.
General Partner
Maritime Associates
911 Western Avenue Suite 500
Seattle, Washington 98104
206-622-0485

B-017-006

The Bypass Tunnel Alternative has been eliminated. As for the question of structural support for a tunnel, there is a competent soil layer at depths ranging from 50 to 100 feet that geotechnical studies have found sufficient for structural support of a tunnel.

Construction activities would interfere with access to businesses and properties adjacent to the project on either side of the right-of-way. A primary goal of construction planning is to maintain adequate access to all businesses so they can continue to operate. Mitigation measures are described in Chapter 8 of the Final EIS.

B-017-007

Construction phasing is essential for a project of this size and complexity, and construction plans have been proposed for all the alternatives. These construction sequencing and staging plans were developed to a level of detail necessary to support the Final EIS in analyzing the environmental impacts of construction with varying construction durations. The description of these plans can be found in the Final EIS Appendix B, Alternatives Description and Construction Methods Discipline Report.

The project has coordinated closely with the Port of Seattle on various design issues over the last several years. Construction sequencing is being designed to minimize disruption to ferry, cruise ship, and Port of Seattle freight operations.

B-017-008

While SR 99 is a state highway, it is also vital to Seattle and the region, and it is part of the national highway system. The lead agencies are committed to meeting the purpose of the project and fulfilling their responsibilities, including funding the project.

-----Original Message-----

From: Susan Woltz [mailto:susan@dadamowoltzgallery.com]
Sent: Wednesday, May 26, 2004 2:00 PM
To: awvdeiscomments@wsdot.wa.gov
Subject: Viaduct Alternatives

B-018-001

As a business owner in Pioneer Square, I would like to sign in my opinion on the viaduct repair/replacement. I am dismayed that ANY parking will be removed as this is a real hindrance to my business. However, after reviewing the EIS draft, it appears to me the best solution would be the tunnel. This would be the safer and less invasive action to the waterfront views/ pedestrian walkways as I see it. I will keep abreast of this development. Sincerely,
Susan Woltz

B-018-002

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B-018-001

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide frequent parking updates
- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

B-018-002

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

GRAHAM & DUNN PC

ELAINE L. SPENCER
(206) 340-9638
espcencer@grahamdunn.com

September 22, 2006

WSDOT
Attn: Kate Stenberg, AWV Environmental Manager
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Ste 2424
Seattle, WA 98104-4019

**Re: Comments of the Seattle Historic Waterfront Association on the
Draft Supplemental EIS**

Dear Ms. Stenberg:

B-019-001

These comments on the Draft Supplemental EIS ("DSEIS") for the Alaskan Way Viaduct and Seawall Replacement Project ("Project") are submitted on behalf of the Seattle Historic Waterfront Association ("Historic Waterfront"). Historic Waterfront's members are the owners of historic piers and of businesses within and alongside those piers, along Seattle's Central Waterfront. Most have been part of the Seattle Waterfront for decades -- in some instances since the Alaskan Way Viaduct was built, and in one instance since the Seattle Waterfront was at First Avenue. They are home-grown, locally-owned businesses and would hope and expect to be part of Seattle's future, as well as its past.

But, they are at Ground Zero for the Project's adverse construction impacts. Their survival depends upon those impacts being fully understood and adequately mitigated. It is essential to them that the purposes and the requirements of the National Environmental Policy Act ("NEPA") and the State Environmental Policy Act ("SEPA") be fully implemented here.

Unfortunately they have not been. In commenting on the March 2004 Draft EIS ("DEIS"), members of Historic Waterfront emphasized the need for the EIS to fully disclose the significant adverse environmental impacts of the construction process. Instead, the DSEIS focuses almost entirely on the impacts of construction on the users of SR 99. Its discussion of the impacts on the Central Waterfront and the rest of downtown Seattle are vague, general, and inadequate to apprise the public or decision-makers of the consequences of the decisions before them. The DSEIS continues to fail to achieve the most basic objectives of NEPA and SEPA.

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B-019-001

The 2004 Draft EIS and 2006 Supplemental Draft EIS discuss potential impacts during construction for the entire project area, which includes the central waterfront. Additional information has been presented in the 2010 Supplemental Draft EIS and in the Final EIS. Effects on the businesses and activities in this area during construction, such as rerouting pedestrian access and increasing traffic congestion, are described in the main volumes and technical appendices. Mitigation measures will include minimizing obstructions and maintaining access during important business seasons. Pedestrian access will be maintained during construction activities. At times, it will be necessary to reroute pedestrians using temporary facilities/detours, but these detours will be designed to minimize any inconvenience. Transportation mitigation measures described in Chapter 8 of the Final EIS will also be important to mitigate effects to businesses.

B-019-002 1. **The DSEIS fails to accurately describe the existing environment that will suffer significant adverse impacts from the construction of the Project.**

The Project proposes to thread a major freeway, perhaps partly in a tunnel, through the heart of a great city. The construction itself will pass through at least seven distinct neighborhoods,¹ in each of which the construction impacts will be unique. Construction will cut off the major artery providing regional and downtown access for West Seattle, Ballard and Magnolia and will displace some or all of the traffic currently on that freeway, sending it through the heart of downtown Seattle and First Hill.

NEPA and SEPA require analysis that begins with a description of the affected environment that the proposal will impact. 40 CFR § 1502.15, WAC 197-11-440(6). Unless the affected environment is understood, it is impossible to adequately understand the proposal's impacts. Contrary to the requirements of NEPA and SEPA, the EIS treats the path of construction as being as homogenous and generic as might be the case if a freeway were being built through the wheat fields of eastern Washington.

Nowhere will the impact of construction be more devastating than on the Central Waterfront, and nowhere is the EIS's failure to accurately characterize the existing environment clearer. Neither the DEIS nor the DSEIS follow the format specified by 40 CFR §1502.10 or WAC 197-11-440. Neither contains any explicit description of the affected environment. The only attempt to characterize of the Central Waterfront is found at page 105 of Appendix C to the DEIS, where the preparers counted pedestrians along the Central Waterfront during the afternoon peak hour in the winter, the least busy season of the year. As anyone familiar with Seattle could have told whoever chose to count pedestrians then, you would not expect many pedestrians on the Central Waterfront during the winter p.m. peak hour; nor did they find many.

What the EIS fails to recognize is that the Central Waterfront, along with the Pike Place Market, Pioneer Square and the Space Needle, is one of the great tourist destinations of Seattle. It is a highly seasonal attraction, with more than 2.5 million annual visitors, most of whom visit from

¹ The industrial area south of the stadiums, the stadium area and Terminal 46, Pioneer Square, the Central Waterfront, the Pike Place Market, Belltown, and lower Queen Anne Hill.

B-019-002

The description of existing conditions provided in the 2004 Draft EIS and 2006 Supplemental Draft EIS has been updated in the 2010 Supplemental EIS and Final EIS, as well as their appendices. The parks, facilities, and businesses along the central waterfront are acknowledged as an important tourist destination.

Updated pedestrian volumes were collected by video along Alaskan Way in downtown Seattle in August 2006. The purpose of these counts was to quantify pedestrian activity in the summer season along the waterfront for use by the Alaskan Way Viaduct Replacement Project team in assessing transportation conditions, developing mitigation measures, completing a Final EIS and furthering project design. Data collected for this effort confirms that pedestrian activity on the waterfront promenade is substantially higher in the summer, particularly during summer weekends. The updated pedestrian counts have been included in the Final EIS.

We agree that the Central Waterfront is an important recreational destination. Pedestrian access will be maintained during construction activities. At times, it will be necessary to reroute pedestrians using temporary facilities/detours, but these detours will be designed to minimize any inconvenience. Any pedestrian facility (e.g., sidewalk, bridge, path, etc.) that may be removed to accommodate construction activities will be replaced to the extent practicable with a temporary facility in a nearby location with equal capacity. Further information on how the project will address pedestrian access and safety during construction activities can be found in the Final EIS. Mitigation measures for the project are described in Chapter 8 of the Final EIS.

WSDOT
September 22, 2006
Page 3

B-019-002

April through October, and visitors peaking in the summer. The DSEIS treats the sidewalks of the Central Waterfront as if they are simply a generic transportation corridor. See, e.g., DSEIS at 92, where it says that during construction bicycles will be routed to other city streets but pedestrian connections would be provided so that people on foot could still make their way to and from businesses on the waterfront. To the contrary, the sidewalks of the Central Waterfront are themselves the recreational destination. The businesses in and alongside the piers are the “furnishings” of that destination, but people stroll the Central Waterfront as a recreational destination in and of itself, not just as a route from one place to another.

Historic Waterfront did its own pedestrian counts on August 4, 2006, during the peak tourist season for the Central Waterfront. The results are shown below, and contrasted with the pedestrian counts the EIS relied on to characterize the existing environment. The data collected on August 4 is attached as Exhibit A.

Alaskan Way Traffic Counts

	Pier 66 West	Pike Hill Clmb W	Spring Street East	Spring Street West	Seneca Street East	Seneca Street West	Total Counts
August 4 Peak Hour	2,061	459	613	2,474	1,013	1,988	8,097
August 4 Avg. Hour	1,537	301	469	1,864	768	1,401	6,400
WsDOT winter pm	Not counted	135	46	300	86	Not counted	

In short, pedestrian traffic during a period of peak usage is eight to ten times what the EIS assumed.

By failing to recognize the nature of the existing environment – that the Central Waterfront is a major tourist attraction, currently vibrant and successful, albeit noisy – the EIS ignores the consequences of eliminating the parking, removing the sidewalks, and making it challenging and unpleasant to come to the Central Waterfront. The EIS fails to recognize that the Project will destroy one of the major tourist attractions of Seattle for upwards of a decade, with the same economic impacts as if San Francisco were to shut down Fisherman’s Wharf. Similarly, by failing to recognize the nature of the environment the Project is damaging – a major tourist destination – the DSEIS fails to recognize the nature of the mitigation that would be necessary if the construction were to do anything other than destroy the Central Waterfront and its businesses. In order to begin to mitigate the impacts of construction, it would be necessary to not only replace the parking, replace the sidewalks, and maintain the pedestrian and vehicular connections, but take extraordinary steps to make the Central Waterfront an inviting tourist destination in the midst of the noise, disruption and visual clutter of a major construction site.

B-019-003 2. The EIS fails to provide an adequate description of the impacts of construction to allow the informed decision making that NEPA and SEPA require.

NEPA and SEPA require a detailed statement of the significant environmental impacts of a proposal in order to "ensure that important effects will not be overlooked or underestimated only to be discovered after resources have been committed or the die otherwise cast. *Robertson v. Methow Valley Citizen Council*, 490 U.S. at 349. To do that, "environmental impact statements must be concise, clear and to the point, and must be supported by evidence that agencies have made the necessary environmental analysis." 40 CFR § 1500.2(b). "The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA." 40 CFR § 1500.1(b).

By contrast, the EIS here describes the impacts of construction in the same generic terms as would describe virtually any highway construction project. It is so vague, so general and so non-specific that it does not fairly apprise either the public or public officials of the consequences of this Project. Members of Historic Waterfront can attest to the inadequacy of the DEIS in achieving its basic purpose. It was only after a series of meetings with Project staff that they realized what neither the DEIS nor the DSEIS allow them to understand – that the environmental impacts of the Project will make it impossible for their businesses to continue.

Chapter 7 of the DSEIS purports to disclose the impacts of construction. It says "pedestrian and bicycle access on Alaskan Way would be limited during construction." *Id.* at 92. "Transportation through the corridor will be difficult during construction." *Id.* at 95-96. "Noise during the construction period would be bothersome and annoying . . . because it would make it unpleasant to be outside and hard to hold conversations." *Id.* at 97. "[V]iews in the project area would be affected by staging areas, heavy equipment, drill rigs, scaffolding, fencing, cranes, dust and dirt, noise barriers or curtains, and storage of construction materials. Distant views of water and mountains might be somewhat cluttered by construction activities, and views up and down the corridor would be cluttered or obstructed by construction materials, equipment, and activities." *Id.* at 97-98. "Construction would make it more difficult for people to make their way to parks and recreation facilities along the waterfront and to move around once they got there. . . . [C]onstruction-related disruptions could keep some people away, and facilities that rely on an admission fee, such as the Seattle Aquarium, might be affected financially." *Id.* at 98. "Construction effects would include traffic detours, traffic congestion, noise and air pollution, and other less direct impacts. Construction along the corridor would temporarily increase the barrier – both perceived and physical – created by SR 99." *Id.* "Construction activities, especially along the central waterfront, would interfere with access to businesses and properties adjacent to the project on both sides of the right-of-way. A primary goal of construction planning is to maintain adequate access to all businesses so they can continue to operate." *Id.* at 99. "The Pioneer Square, central waterfront and commercial core business districts rely upon

B-019-003

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. As a result of the comments received on the 2006 Supplemental Draft EIS, additional planning and analysis was conducted and presented in the 2010 Supplemental Draft EIS.

After the 2006 Supplemental Draft EIS was published, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2006, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2006 Supplemental Draft EIS, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to identify the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront.

In the Final EIS, Chapter 6 discusses the construction activities, durations, and detours in detail. Construction for the preferred Bored Tunnel Alternative is expected to begin in August 2011 and last about 5.4 years. A primary detour used during construction of the bored tunnel

B-019-003 short term metered parking, so the loss of close parking and increase in traffic congestion could deter customers and cause a loss of business.” *Id.* at 100.

These are generic comments, equally true of the most minor of roadway repairs. They disclose that the construction process will be difficult and unpleasant, but provide no warning that it is any different from highway construction projects that businesses endure and survive on a regular basis. The reality, as described by Project staff in meetings with Historic Waterfront members, is quite different.

From those discussions with staff we learn that on day one of construction, the Project will close Alaskan Way except for one lane in each direction, potentially remove some or all of the limited on-street parking and remove all parking under the viaduct. It will then dig a trench the length of the Central Waterfront deep and wide enough to relocate a six-foot diameter sewer line, the major natural gas line serving Seattle, a 21-inch water line and the major power line serving downtown Seattle, along with other utilities. Pedestrians coming to the Central Waterfront from downtown hotels will have to cross that trench. Buses bringing visitors will have to compete with delivery trucks and other north-south traffic for use of the single lane in each direction to find a place to pull over and drop off passengers, and will have no place to park. Visitors who now drive to the Central Waterfront will have no place to park. At the same time, the Project will also be building temporary “bridges” from Western Avenue to one or more of the individual piers, to provide their only access during later stages of construction. They will also build bridges between one or more of the piers, which may cut pedestrian and other traffic through the middle of businesses.

After 30 months of the initial phase, “real” construction begins with the closure of all north-south use of Alaskan Way. The Project will physically remove the sidewalk in front of the piers – the sidewalk that in August 2006 held upwards of 2,400 people at a single location during its peak hour. The DSEIS says they will drive sheet piling along the entire waterfront where the sidewalks were removed, although that may be substituted with repairs along the existing seawall. Then if the tunnel is constructed, the Project will place up to four of the largest cranes in the world along the Waterfront, each supported by two auxiliary cranes. (We now understand that the Project may do all the work south of Spring Street first, then three years later do all the work north of Spring Street. If that is the plan, then it is likely that only two of the largest cranes in the world, each supported by two auxiliary cranes, will be used.) The large cranes will spend months drilling 4-foot diameter interlocking pilings to form the outer wall of the tunnel, after which the Project will dig a hole 60 feet deep and 80 feet wide that people coming to the historic piers may again have to cross. If the elevated structure is built the Project will have major construction along the entire viaduct. As with the tunnel, it will remove the sidewalk, dig a hole 40 feet wide by 15 feet deep in the street, but then spend months with heavy equipment forcing grout into the soil along the seawall.

would be located on the WOSCA property west of Qwest Field. SR 99 traffic would use the WOSCA detour during the first 4.5 years of construction. Please see the Final EIS for addition roadway restrictions and closures.

B-019-003 All of that process will continue for from four to seven years. The active construction in front of any particular property may be a matter of months, but lulls while construction is elsewhere on the waterfront will be followed by subsequent bursts of intense activity, which will make it impossible to do business within the piers, if one were to assume any customers would come to the piers. The lulls may matter little to the members of Historic Waterfront. Their accessibility will be destroyed and the amenity values of the Central Waterfront will be damaged in Stage One of construction, and the character of the pedestrian environment will only deteriorate from there. There is no reason to expect any of them to be in business eighteen months after the start of construction.

Visitors to the Central Waterfront come there during their leisure time for its recreational value. They make discretionary visits, motivated by the pleasant experience of strolling the Central Waterfront. While there may be occasional visitors who will brave a lack of parking, noise, dust, smells and frightening visual character to cross the largest construction site in the state's history and reach the piers during construction, it is unlikely that many will do so. Now that they understand the environmental impacts, members of Historic Seattle expect their business to drop by 80-95% during the construction process. No business can survive that sort of drop for a period of years.

The purpose of an EIS is to provide an adequate description of the impacts of the proposal to allow for informed decision making. The EIS so understates the magnitude of the construction impacts that it does not allow the reader to understand that the proposed action is to destroy the Central Waterfront, putting all of its existing businesses out of business, and eliminate one of the major tourist destinations of Seattle for the duration of construction. That is information that the public and decision makers need to have in considering the choices before them.

B-019-004 3. **The DSEIS does not adequately address the traffic impacts on the rest of downtown Seattle from the partial or complete closure of SR 99 during construction.**

The DEIS, DSEIS and the Transportation appendices to each spend a great deal of space discussing the transportation benefits of the Project once completed, but largely relegate the transportation impacts of the construction process to a "Construction Transportation Management Plan" which is yet to be developed. DSEIS at 95. Those potential mitigations that are discussed in the EIS focus primarily on mitigating the impact on the users of SR 99, getting commuters into and out of Seattle, or getting trips through downtown Seattle which begin and end somewhere else. The DEIS and DSEIS fail to consider, or recognize the need to mitigate, the impacts of the construction process on neighborhoods of Downtown Seattle that are not simply commuter destinations and for which increased congestion can be deadly.

B-019-004

One component of the project's purpose is to avoid major disruption of traffic patterns. When selecting the preferred alternative, the lead agencies considered the amount of time SR 99 would be closed during construction. The preferred Bored Tunnel Alternative would close SR 99 for a few weeks to construct the WOSCA detour and connect the existing facility to the new tunnel portals. The Cut-and-Cover Tunnel Alternative would close SR 99 for 39 months in the northbound direction and 42 months in the southbound direction. The Elevated Structure Alternative would close SR 99 to all traffic for 2 to 4 months midway through construction and again for 3 months at the end of the construction period.

Further modeling and analysis of the traffic impacts in the area during construction have been conducted and are described in Chapter 6 of the Final EIS and Appendix C, Transportation Discipline Report. Construction impacts on neighborhoods are described in Appendix H, Social Discipline Report, and construction impacts on businesses are described in Appendix L, Economics Discipline Report. Both appendices describe mitigation measures for these impacts. In addition, mitigation measures associated with construction of the Alaskan Way Viaduct Replacement Project are presented in Chapter 8 of the Final EIS.

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B-019-004 Regardless of the alternative chosen, for three and a half to seven years or more Project construction will displace between half and all of the 119,000 vehicles that currently use SR 99. Some of that displaced traffic will disappear. Some will be diverted onto I-5, which because it is currently at or near capacity cannot accept much additional traffic. The largest increases will be on the streets of downtown Seattle and on First Hill.² It is essential that the EIS fully describe the impacts of that construction traffic, because beyond the Project's destruction of the existing waterfront, congestion from that traffic may have the largest overall adverse impact on the City and the region.

It is essential that not just the Project proponents' conclusions but also the underlying data and analysis be made available to the public, so that the public and decision makers can fully understand the impacts on the rest of downtown of diverting the traffic from SR 99. Neither the DSEIS, nor its appendices, provide any of the data or analysis to support the EIS's conclusory statements. (See 40 CFR § 1502.18(b), providing that appendices to an EIS "normally consist of material which substantiates any analysis fundamental to the impact statement;" here by contrast, the Transportation appendix simply repeats the same conclusions found in the text without any of the supporting data or analysis.) The DSEIS lists "Traffic Modeling and Transit" as an issue that remains to be resolved, raising questions about whether the rather sparse conclusions in the EIS should be treated as reliable at this juncture. DSEIS at 39. The estimated daily traffic volumes shown on pp. 93-95 of the DSEIS cannot be reconciled with the data on pp. A-9 to A-20 of "Assessment of AWV Construction Approaches: Closed Viaduct or Partially Open Viaduct," Parsons Brinkerhoff (2005) ("Closed Or Partially Open Assessment"), which is the only analysis of the impacts of construction that has been previously made available. It is unclear whether the DSEIS is based on new data, different analysis, an updated model, or some variation on all of the above.

It is also critical that the EIS disclose the impacts on the specific neighborhoods within downtown Seattle, rather than addressing only the number of north-south trips at three screenlines – Mercer Street, Madison Street and Spokane Street. DSEIS at 94. Although there is no way to reconcile the vehicle trip counts between the totals shown on pp. 86 and 93-95 of the DSEIS and those shown in the Closed Or Partially Open Assessment, the trip distribution diagrams in the Closed Or Partially Open Assessment drive home a critical point: the "average" increase in traffic in downtown Seattle is misleading because while some streets are barely affected or will have less traffic as a result of the increase in general congestion, some streets

² The DSEIS states that the Project will increase peak congestion on I-5 from its current 5 to 8 hours per day to 8 to 12 hours per day when SR 99 is partially closed and 9 to 14 hours per day when SR 99 is closed. DSEIS at 94. It says that peak congestion on downtown streets would go from its current 3 to 4 hours per day to 5 to 10 hours per day when SR 99 is partially closed and 10 to 13 hours per day when SR 99 is closed. *Id.* at 93-94.

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will experience dramatically more than the “average” increase in traffic. Attached as Exhibit B are the trip distribution sheets from the Closed Or Partially Open Assessment showing the change in daily traffic volume under “Scenario 1” (SR 99 open but limited to one or two lanes) and “Scenario 3” (SR 99 closed). The traffic increases for selected locations are shown below.

INCREASES IN DAILY TRAFFIC

	Scenario 1	Scenario 3
Mercer north of Seattle Center	+34%	+45%
Mercer between 5 th and Aurora	+231%	+236%
Westlake at Valley	+427%	+437%
Broad at Seattle Center	+134%	Traffic decreased because the Broad Street detour is not included
First Ave. between Pike and Pine	+27%	+60%
Second Ave. between Pike and Pine	+69%	+75%
Third Ave. between Pike and Pine	+25%	+45%
Fourth Ave. between Pike and Pine	+4%	+23%
Fifth Ave. between Pike and Pine	+11%	+18%
First Ave. north of Yesler	+81%	+279%
First Ave. south of Yesler	+119%	+366%
Second Ave. between Yesler and Fourth	+6%	+28%

If these increases are in fact what will be experienced, they will result in very significant adverse impacts to three areas that are particularly sensitive to increased congestion: Seattle Center, the retail core and Pioneer Square. A strategy which focuses on improved transit and getting more trips through Seattle will do nothing to mitigate the impacts of increased congestion on these areas, because they are not now transit dependent and they rely for their success on the ability of people to drive to them and park at them.

- Seattle Center is home to some of the cultural treasures of the region – Pacific Northwest Ballet, Seattle Opera, Seattle Repertory Theater, Intiman, Book-It Repertory Theater, Pacific Science Center. Each of these non-profits depends upon maintaining ticket sales, and their stability would be threatened if increased congestion leading to Seattle Center

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dissuaded patrons from renewing subscriptions or buying single tickets. Mercer Street in particular is key to access to Seattle Center, and the increases shown for Mercer Street suggest very severe impacts on Seattle Center.

- The retail core is a second Seattle treasure – one of the few urban retail cores that has thrived while most retail has abandoned city cores. But Seattle's retail core is in constant competition for regional shoppers. Increasing traffic from 11% to 75% in the retail core would have very severe impacts on the retail core's ability to be competitive.
- Pioneer Square is a key neighborhood for Seattle, having been resurrected in the 1970s from decades of decay, but facing current challenges to its stability. Increasing traffic through its main street by 81% to 366% would significantly hinder efforts to preserve its livability.

Because we cannot reconcile the data in the Closed Or Partially Open Assessment with the data in the DSEIS, we do not know if the projections in the Closed Or Partially Open Assessment are likely to be correct. It is simply the only detailed data so far produced to the public by the Project proponents. The EIS must present an assessment, supported by verifiable data and analysis, of the probable traffic impact on the specific areas within downtown Seattle that will be most affected. Before there is any irreversible commitment of resources, the public and decision-makers need to understand the impacts of congestion the Project will cause on Seattle Center, the retail core and Pioneer Square for three and a half to seven years or more.

It is also essential before there is any irretrievable commitment of resources to have an analysis of the expected impact of the various mitigation measures that the DSEIS suggests may be included in a construction traffic mitigation plan. The mitigation plan must recognize and address the unique needs of the neighborhoods that are being affected. The DSEIS proposes mitigation such as removing on-street parking to allow more vehicle trips to pass on the streets of the area. While that may mitigate the impact on users of SR 99, it may increase the adverse impacts on areas such as Pioneer Square. The DSEIS proposes improving transit as a primary mitigation method. That may have little or no benefit for areas such as Seattle Center and the retail core, which depend upon patrons and customers being able to drive to and park at their destinations. The EIS cannot simply treat the area where traffic will be diverted as homogenous and able to rely on transit instead of automobiles, because critical parts of the affected environment will suffer unique impacts from the increased congestion caused by the Project and have unique needs that must be addressed.

B-019-005 4. **The EIS must fully evaluate the air quality impacts of the congestion resulting from construction.**

The City of Seattle has recently committed itself to leadership in the area of reduction of greenhouse gases and global warming. The City has also recently become a "maintenance area" for carbon monoxide, one of the deadliest air pollutants. Being a maintenance area means that the region has recently attained compliance with the National Ambient Air Quality Standards (NAAQS). DSEIS at 68. Motor vehicles are the source of over 90 percent of the carbon monoxide emissions that cause the NAAQS to be exceeded. DEIS App. Q, at 7. Motor vehicles are also the major source of greenhouse gases. *Id.* at 12. The highest CO emissions occur when vehicles are at speeds below 10 miles per hour – in other words, when they are stuck in congestion. *Id.* at 21.

As with much of the EIS, the analysis of air quality impacts thus far is focused primarily on the impacts of the finished Project. On a much less intense scale, there is some consideration of air quality impacts in the immediate construction corridor during construction. There is no analysis at all of the air quality impacts that the congestion of the construction process will cause elsewhere in downtown Seattle. In the Air Quality Discipline Report appendix to the 2004 DEIS the proponent went through a detailed analysis of congested intersections expected as of 2030, and the air quality impacts of the congested intersections that will exist as a result of the normal expected growth in traffic. It is exactly that analysis which is required for the congestion that will occur as a result of the closure or partial closure of SR 99 during construction. In addition, since during partial closure of SR 99 it is likely that traffic on SR 99 will itself be highly congested, there needs to be air quality modeling for the traffic that remains on SR 99, at crawl speeds. The Air Quality Discipline Report suggests that no analysis of the air quality impacts is contemplated except as necessary to prove that the Project meets the requirements to receive federal funding. The analysis of air quality impacts, based on intersection analysis throughout downtown in the face of the closure or partial closure of SR 99, is required in the EIS because air quality degradation caused by the congestion of construction is potentially a significant adverse impact. It is unacceptable that the air quality impact of construction be disclosed only in some separate document, submitted only to the Federal Highway Authority.

B-019-006 5. **The Project must fully mitigate its impact on parking. At least on the Central Waterfront, and probably in some other neighborhoods of downtown Seattle, "increased utilization of existing parking" is not a mitigation option. New parking must be built to replace the parking that is eliminated.**

Members of Historic Waterfront regularly survey their customers, to understand who they are, where they came from and how they got to the Waterfront. Depending on the business, those surveys consistently show that from 60-75% of the customers drove automobiles and parked

B-019-005

A mobile source analysis has been conducted to estimate the potential air quality effects from the traffic conditions anticipated during construction and operation of the project. These analyses are described in the Final EIS and Appendix M, Air Discipline Report. Mitigation measures for traffic during construction are also described in the Final EIS and Appendix C, Transportation Discipline Report.

B-019-006

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide

B-019-006

within a block or two of the Waterfront, primarily using the limited parking on Alaskan Way, the parking under the viaduct, the two surface lots on Western north of Madison and University, or the surface lot on Alaskan Way east of the Seattle Aquarium. Use of the Central Waterfront, and therefore parking demand, is highly seasonal and will remain so after the Project is completed. In the summer, the peak season, lack of available parking is currently the primary factor restricting business for Historic Waterfront members.

The DSEIS says that at the beginning of Stage One the Project will remove all parking under the viaduct and reduce Alaskan Way to one lane in each direction. DSEIS at 84. We assume that will also eliminate the parking on Alaskan Way. Appendix K to the DSEIS shows the Project acquiring the surface lots north of Madison and east of the Aquarium, although it does not state when or for what purpose they will be acquired. It appears that this Project will eliminate a substantial portion, and perhaps almost all of the parking upon which Historic Waterfront's members depend.

The Project must mitigate that loss of parking by providing new, conveniently located parking on a one-for-one ratio. Unless, the Project intends to put Historic Waterfront's members out of business – in which case it should state that clearly so that the public and decision makers understand its intended impact – the replacement parking must be in place before existing parking is removed.

In considering mitigation of parking impacts several points must be kept in mind.

- The region has, and is improving, a transit system designed to get commuters to and from major employment centers. It does not have, and has no plans to build, a transit system designed to carry visitors to major tourist and retail destinations, particularly the Central Waterfront. Therefore, automobile access and parking remain critical to their survival, much less their success.
- Visitors to recreational destinations such as the Central Waterfront do not necessarily have the same intrepid flexibility as urban commuters. They often come as families, including children or grandparents who cannot easily walk long distances. They are often out of town visitors and are not comfortable "getting around" in the heart of the city. That means that while some sort of remote parking at Seattle Center or Safeco Field's parking lot with a shuttle might work to mitigate loss of downtown commuter parking, it will provide no mitigation for loss of parking on the Central Waterfront. Central Waterfront customers will simply not come if they cannot drive and park within a block or two of the Waterfront.

frequent parking updates

- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

B-019-006

- The DSEIS proposes to “increase the use of other parking facilities in the area.” DSEIS at 106. The Transportation Discipline Report, DSEIS App. C at 99, bases the ability to mitigate parking loss through increased utilization of existing facilities on a 2004 PSRC parking inventory, which purported to show only 66.4 percent utilization of central waterfront parking, and 500 unutilized spaces. We have reviewed that study. Although it may suggest that modern technology and signage could help mitigate removal of on-street parking in the downtown office core, it provides no basis for mitigation along the Central Waterfront. The study does not disclose where the vacant parking spaces were found, but it does disclose that each parking facility was surveyed twice – once between 9:30 and 11:30 a.m. and a second time between 1:30 and 3:30 the same afternoon on a Monday through Thursday between March and June of 2004. There is plenty of extra parking on the Central Waterfront during the midst of the business week in March or April, or even perhaps May or June. Parking demand on the Central Waterfront is highly seasonal. None of the businesses could survive, however, if lack of parking capped their businesses at their off-season level. Like retailers, who depend on sales between Thanksgiving and Christmas, Central Waterfront businesses must have parking to accommodate peak season demand. During the peak season, there is currently a shortage of parking, which restricts the growth of Central Waterfront businesses. Any loss of existing parking will exacerbate that problem and must be mitigated.
- Construction workers must be prohibited from parking downtown. The DSEIS states that construction workers could require up to 2000 parking spaces. DSEIS at 100. At a time when the Project is placing maximum stress on all parking-dependent businesses Downtown, the least the Project can do is provide construction parking well outside of Downtown and bus workers to the site.

B-019-007

6. **The discussion of construction noise impacts is too vague to provide a meaningful assessment of the magnitude of the noise impact.**

The DSEIS says that “typical noise levels from construction equipment range from 69 to 106 dBA at 50 feet from the source.” DSEIS at 97. On the other hand, it says that “The majority of construction activities would fall within the range of 75 to 85 dBA at 50 feet ...,” with some activities reaching 100 dBA. It further states that current noise levels range from 57 to 81 dBA, DSEIS at 104. *Id.* In short, the area is currently noisy; some noise during construction will be similar to what currently exists; other noise will be much louder. There is no way to tell from that description whether construction noise will be an annoyance or so severe as to make it painful to be at the Central Waterfront. A construction noise mitigation plan will be developed later – so there is no way to assess what effect it may have on the magnitude of the noise impact. This is simply inadequate to fulfill the purposes of NEPA and SEPA.

B-019-007

Removing the viaduct would be the loudest construction activity for businesses and residents near the viaduct. Although viaduct demolition would take approximately 9 months, demolition of individual two-block segments is expected to last no more than 4 weeks. Extremely loud activities, such as pile driving, are no longer anticipated in the Central Waterfront area. Current analysis and discussion of construction noise is provided in the Final EIS and Appendix F, Noise Discipline Report.

B-019-008 7. The economic impact analysis is one-sided and inadequate.

It is not clear that the EIS was required to provide an economic analysis of the impacts of construction. It chose to do so, however, DSEIS at 99-100. Having done so, it was required to do so a balanced way.

Instead, it patronizingly dismisses the adverse impacts of construction on businesses along the Project corridor. ("Some businesses may be periodically disturbed ... while others ... may suffer a decline in revenue ...") "The project partners recognize that construction will be tough for many businesses located near the construction area. Construction effects to businesses in the project area are important considerations for the project partners as we work to determine how the project will be built."³) DSEIS at 99. It ignored the economic impacts on any place more than 50 feet from the Project's construction limits, in spite of the probable significant adverse impact on much of downtown Seattle, the Port of Seattle, and the Ballard/Interbay industrial areas. It then claims that construction will have significant economic benefits for the region by adding from 1,085 to 1,125 construction jobs and \$112 million in construction wages per year for the tunnel or 670 jobs and \$67 million for the elevated structure.

It is entirely misleading to claim the "benefit" of construction jobs without deducting the lost jobs and lost wages of the businesses that will close along the waterfront, the lost hotel and convention business from years of maximum congestion in Seattle, the losses to arts organizations at Seattle Center, the losses to the retail core and Pioneer Square, and the losses of the Port of Seattle.

The Economics Appendix claims that although businesses in downtown Seattle may suffer during construction due to the perception that it requires too much hassle to get into or out of downtown, the regional economy would not be affected because regional customers would simply shop closer to home or elsewhere in the region. DSEIS App. at 47. While it is true that Bellevue Square and Redmond Town Center may be major beneficiaries of the Project, it is not true that Seattle's loss will be cancelled by gains elsewhere in the region. Conventions that would have come to the Seattle Convention Center will not necessarily go to the Bellevue or Everett Convention Centers; they are much more likely to go to Portland or Vancouver. Cruise ships that find it too difficult to provision their vessels or to get passengers from SeaTac to

³ This final comment is most annoying to Historic Waterfront members. The Project has summarily refused to consider several alternatives that would have less impact on them and on other Downtown businesses. It has provided no mitigation plan. Historic Waterfront members have had at least seven extended meetings with Project staff ostensibly to discuss mitigation, but to date no mitigation has been proposed that would begin to allow the businesses to survive.

B-019-008

Because the project has evolved, please see the Final EIS for current project information. The economic analysis presented in the Final EIS has been supplemented with a discussion of the cost of increased congestion during construction. The level of specificity of the cost of congestion analysis was wholly dependent upon the detail generated from the traffic modeling.

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

The project team acknowledges that there will be difficult economic times for businesses within the immediate impact area and that the City of Seattle will absorb a certain loss in productivity due to increases in congestion. The project does not intend for businesses along the waterfront to close. The indirect economic effects (such as the diversion of tourists to other destinations within the Puget Sound Region and the relocation of businesses) are subject to many variables that cannot be quantified as a result of the direct impacts due to construction. These indirect effects are expected to be balanced by the influx of construction dollars into the regional economy.

The losses that may or may not materialize for businesses outside of the area of immediate impact would be subject to economic forces beyond the control of this project and cannot be calculated without speculation.

B-019-008 dockside will not relocate to Bellevue; they will relocate to Vancouver, B.C. Tourists who might have come to Seattle to vacation will not necessarily come to the Eastside instead; they are much more likely to vacation elsewhere. Businesses that would have located in Seattle are not necessarily going to locate in one of the suburban cities; they are at least as likely to locate in Boise or Denver. Seattle is the economic heart of the Central Puget Sound region. While it is true that the impacts of construction may cause Seattle to cede that role to the Eastside, there is simply no basis to assert that making the heart of the region too much hassle to get into and out of for years will not have adverse impact on the regional economy.

The economic impact analysis must be redone, and must provide an analysis of the economic and civic impacts of shutting down the Central Waterfront, greatly increasing congestion for congestion-sensitive areas such as Seattle Center, the retail core and Pioneer Square, obstruction of the Port of Seattle, and of making Seattle "too difficult (hassle factor)," DSEIS App. at 47, for the period of construction when SR 99 is partially or completely closed. DSEIS at 84.

B-019-009 8. **If the elevated alternative is selected, the approach to the seawall reconstruction should be reconsidered and a new alternative developed that does not close the Central Waterfront.**

We recognize that it has been, or should have been, clear since the mid-1950s that the design of the seawall was flawed, allowing marine life to damage the relieving platform. In a presentation to Waterfront property owners, however, the City made it clear that it is vigorously monitoring the seawall, and it is not moving. Maintenance is costing the City roughly \$200,000 per year, and the Nisqually earthquake required \$2 million in repairs of the settlement of the loose fill behind the seawall. The Project appears to have budgeted upwards of \$400 million to replace the seawall south of Pike Street. It is obviously not appropriate to spend \$400 million to avoid a \$200,000-per-year maintenance expense with periodic \$2 million infusions.

We also recognize that there is another component to the seawall replacement, which is to increase its seismic performance. While that is undoubtedly a valid objective, it must be pursued with judgment and common sense. The proposed replacement of the seawall will be as disruptive of the Central Waterfront as failure of the seawall in an earthquake would be. The Project must develop a seawall replacement strategy that is less disruptive and less costly.

We understand that the Project staff has decided that all components of the Project must be designed to withstand a 2500 year earthquake. That standard may be appropriate for SR 99. Since no building codes require that standard for buildings, it is an appropriate standard for the seawall only if it does not cause less disruptive alternatives to be ruled out. At the very least NEPA and SEPA require that less disruptive alternatives be disclosed, so that the public and

B-019-009

The seawall is part of the Cut-and-Cover Tunnel and Elevated Structure Alternatives, but is a separate project under the Bored Tunnel Alternative. Because the seawall is not integral to the bored tunnel, this allows for less construction disruption along the central waterfront.

The decision to replace the seawall is not based on the desire to avoid regular maintenance costs and periodic capital repairs. The maintenance and repairs are the minimum needed to keep the seawall functioning, though the seawall is already past its design life. Test probing indicated 37 percent of the seawall had timber relieving platform damage. This maintenance work will increase in frequency and expense as the seawall continues to age. Typical marine structures built in the 1930s were designed to last up to 50 years. The seawall is over 70 years old. An expanded monitoring program is essential to better predict seawall movement increases, which are our best means of advance warning of a failure.

The new seawall design will meet current seismic design criteria that the existing seawall does not meet. Analysis of the existing seawall indicates it will not withstand a large earthquake, even if it were in like-new condition. Planning for the needed replacement is the prudent and fiscally responsible approach.

B-019-009 decision-makers can evaluate the trade-offs they require, rather than the choice being made unilaterally by staff and presented as final.

Finally, if the elevated alternative is selected, it will presumably include pilings that are founded on competent soils, and thus not dependent upon the seawall holding the loose fill in place. If that is true, then a seawall replacement need not happen in one mammoth project. Alternatives should be considered which replace the seawall over time, during the waterfront's off-season. Considering such alternatives may result in more creative ways to allow the meeting of land and water, that are more beneficial to business, to people and to the marine environment than the current seawall or the proposed replacement could possibly be.

B-019-010 9. The draft EIS must include the project's mitigation plans.

Vague and general though the DSEIS's description of the Project construction impacts may be, it is clear from Historic Waterfront's discussions with Project staff that construction will destroy the Central Waterfront businesses, and will substantially increase congestion in and through Downtown Seattle for years. The DSEIS commits to NO mitigation. At most it suggests some approaches that may be included in mitigation plans yet to be developed. Because there are as yet no mitigation plans, the DSEIS provides no analysis of the effectiveness of the mitigation, nor of the significant adverse environmental impacts which the mitigation itself may have.⁴

The DEIS says that a Construction Transportation Mitigation Plan, a Noise Plan, and a Business and Residential Mitigation Plan will be developed through separate "extensive public review and involvement process[es]," DSEIS at 104, but will only be included in the Final EIS. That fails to meet the basic requirements of SEPA and NEPA, which require that mitigation be included in the draft EIS. *See*, 40 CFR § 1502.9(a). It is also unworkable for the public.

Until the impacts of the project are fully disclosed, including the effects of mitigation, no assessment of the Project can be made by the public or decision-makers. In this case, by the time the FEIS is issued there may well have been an irretrievable commitment of resources. The public is entitled to comment on the mitigation, as well as the Project. But none of the public is able to follow a marathon of multiple mitigation plans being developed in multiple "extensive public process[es]." NEPA and SEPA contemplate a practical process, within the means of

⁴ Some of the proposals to mitigate the impacts on users of SR 99 may have very significant adverse impacts on others. For instance, the Project proposes to "remove on-street parking along First, Second and Fourth Avenues in downtown Seattle and convert these areas to traffic lanes." DSEIS at 96. That parking may be particularly essential to the vitality of Pioneer Square and restaurants and retail in Belltown, and may provide the only visitor parking for thousands of residents of Belltown. Those impacts must be disclosed as well.

B-019-010

We believe potential mitigation discussed in both the 2004 Draft EIS and 2006 Supplemental Draft EIS was appropriate for those documents. Mitigation, like project plans, evolve and are refined through the development process. Continuing analysis and work with affected parties, like the waterfront businesses, helps to further develop mitigation measures. Chapter 8 of the Final EIS discusses the current mitigation measures for the project. The lead agencies will continue to refine mitigation measures and work with affected businesses and residents throughout the project's design and construction process.

B-019-010 affected citizens to have meaningful input. Members of Historic Waterfront have to date attended dozens of public meetings about the viaduct. They have been interviewed by Project consultants. They have had seven extended meetings with Project staff to discuss how they might survive construction -- to date yielding no commitments for mitigation. While the Project may have an infinite budget for "process," members of Historic Waterfront have limited resources and have businesses to run. They cannot participate in infinite public process in the hope that someday they will learn of real mitigation. Thus the process which SEPA and NEPA require cannot be replaced by "extensive public process" without excluding them from meaningful input.

B-019-011 10. **The EIS must include a full assessment of alternatives that may feasibly attain or approximate the proposal's objectives, but at a lower environmental cost.**

Where a proposal's adverse impacts are insignificant, or where its impacts can be fully mitigated, there may be little need to explore alternatives to a proposed course of action. Where as here, however, the environmental impacts are great, NEPA and SEPA both require that there be a serious consideration of all reasonable alternatives. 40 CFR § 1502.14(a); WAC 197-11-440(5). That consideration must be objective, and not simply designed to provide a rationale for dismissing ideas that did not originate with the project proponent.

Here, by contrast, there was an early decision that only the two alternatives described in the DSEIS would be seriously considered. Other alternatives that could achieve the project's core objectives at lower environmental cost have been summarily dismissed, including alternatives that could be built without closing down the Central Waterfront, and with a much shorter closure of SR 99 than the alternatives the DSEIS considers, but which would in some fashion fail to meet the engineering design specifications that the Project staff has set for the project.

- The alternative of taking the tunnel up Western Avenue was dismissed because for the northern 1,000 feet the posted speed limit would only be 35 mph, not 50 mph, which is the Project's specifications, and because it would not fix the seawall.⁵ On

⁵ The Project team also refused to consider redesigning the life-safety existing system, which made the tunnel too wide to fit into the Western right-of-way, ostensibly because the fire marshal had already approved its proposed life-safety system. Project staff freely admitted that the life-safety system could be re-designed so that the tunnel would fit within the right-of-way. The Project is at something like 5% design. It is inexcusable under NEPA and SEPA to subject either the Central Waterfront or the rest of the region to the consequences of the proposed alternatives because the Project team is not willing to do more design work. The DSEIS also says the Western Alternative would be "steep, which could further reduce travel speeds for drivers." At a meeting where staff claimed the grade of the Western Alternative would be too steep, proponents offered to assist staff in solving that alleged difficulty. Staff never responded to that offer. The proponents subsequently determined, however, that the maximum grade of the Western Alternative would be 4.8%. By contrast, the maximum grade of the tunnel alternative described in the

B-019-011

The alternatives presented in the 2004 Draft EIS and the 2006 and 2010 Supplemental Draft EISs represent a reasonable range of approaches that can meet the purpose and need for the project. Many options were looked at during the initial phases of the project's screening process. The screening process involved early analysis by the project team and discussions with community groups at more than 140 community meetings and community interviews, including businesses along the corridor. A total of 76 initial viaduct replacement concepts and seven seawall concepts were considered, and concepts that were not feasible, or were outside the purpose of the project were dropped from further consideration. The most workable ideas were shaped into the alternatives analyzed in the 2004 Draft EIS. Further screening and analyses were conducted for the 2006 Supplemental Draft EIS. In 2010, a second Supplemental Draft EIS was prepared to analyze the Bored Tunnel Alternative. The Final EIS contains descriptions and analysis of the current project alternatives.

As you state in your letter, NEPA and SEPA require agencies to evaluate reasonable alternatives; however, these same regulations allow agencies to eliminate alternatives. If agencies drop concepts or alternatives from further evaluation, they are required to briefly discuss the reasons why they were dropped. Some of the concepts/alternatives you have listed have been considered and the reasons why they have been dropped were stated in the 2006 Supplemental Draft EIS, as well as project screening documents included as references to the 2004 Draft EIS and 2006 Supplemental Draft EIS documents.

The lead agencies have evaluated several possible retrofit concepts over the years and have also submitted some of these proposals to other engineers for independent review. In all these cases, the conclusion has been the same--feasible retrofitting options cost almost as much as

B-019-011

the other hand the Project team admitted the Western Alternative could keep the waterfront open during construction if the seawall were not included, that the impact of construction on any particular property owner on the Western route could be a matter of months, not years, and that closure of SR 99 could be limited to two to six months, not three and a half to seven years. If given a choice, the public and elected officials might choose destruction of the waterfront and years of traffic congestion as the price to pay for getting the seawall fixed now and being able to drive 50 mph – before slowing down to 35 at the Battery Street Tunnel, which is already signed for lower speeds. Or they might not. NEPA and SEPA require that the choices be presented for the public and decision-makers to consider, and not unilaterally made by the project proponents.

- Project staff rejected a deep bore tunnel because it might cause building settlement of as much as 1 ½ inches, without any discussion with structural engineers who are familiar with the affected buildings. Current bored tunnel technology is being used in California at costs far below the projected cost of any alternative considered in the EIS. A deep bore tunnel could have minimal construction impacts. Nonetheless Project staff has stood by a decision made years ago, before current technology existed, that a deep bore tunnel would be too expensive and too risky.
- Project staff has recently given more consideration to a retrofit proposal, but also dismisses it as not meeting the project's seismic standards. The staff's analysis of the retrofit shows that the retrofit would survive but be damaged by the 500-year earthquake, and the columns could potentially fail in a 2500-year earthquake. *See, Evaluation of Gray's Retrofit Proposal, TY Lin (2006), at 21-22.* Again, the public and elected officials might choose destruction of the Central Waterfront and years of congestion in order to have a finished viaduct that meets the 2500-year earthquake standard. Or they might not. NEPA and SEPA require that those choices be presented for them to consider, not decided by staff without a public vetting of the choices.

These are reasonable alternatives under NEPA and SEPA that must receive objective analysis and a fair comparison to the alternatives being offered by the project proponents. "Objective" analysis is key. It is clear that Project proponents have focused on finding potential flaws in any other alternative, at the same time that they minimize the potential risks and flaws of their own

DSEIS is 7%. Again it was apparent from the minimal level of design work that Staff invested in the Western Alternative that their conclusion that its grades would be too steep was simply because they weren't willing to spend any time trying to make it work.

replacing the structure, but a new structure would be safer, far more reliable, and would last much longer.

B-019-011 alternatives.⁶ There is no way to thread a major freeway through a great city without both risks and impacts, and none of the alternatives are without their risks and impacts. But NEPA and SEPA do not exist to validate previous decisions, made without public scrutiny. They exist to ensure that decisions are made based on full information. The risks and benefits of all reasonable alternatives must be set forth in the EIS, so that the public and elected officials have the information to make the decisions that are properly theirs, not the private domain of consultants and staff.

B-019-012 11. A revised draft EIS must be issued that meets the requirements of NEPA and SEPA.

In their comments on the 2004 DEIS a number of members of Historic Waterfront said that the DEIS was inadequate and required supplementation because:

The DEIS does not disclose the impacts of construction on the people who must live and work in its midst; the DEIS does a disservice to thousands of people who must live through years of disruptions by saying nothing more than this "could" drive customers away.

The DEIS fails in its obligation to disclose mitigation that may reduce the primary adverse impacts of the project; it is simply not good enough to disclose potential mitigation later.

That remains true. The EIS must contain all the elements required by NEPA and SEPA. On its face it does not. A new draft EIS is required. 40 CFR § 1502.9(a). The alternatives that are now being considered to shorten construction will themselves visit such extraordinary adverse impacts on the City that alternatives other than simply shortening construction must be considered.

The DSEIS appears to falsely assume that because the scope of the construction and its adverse impacts are so extraordinary, the normal requirements of NEPA and SEPA can't be expected to apply to the Project. It assumes that the EIS should not be expected to identify environmental

⁶ In addition to the EIS's failure to adequately describe the impacts discussed earlier in this letter, the EIS does not state that Project staff has identified as risks of their proposal that construction may conflict with BNSF's ability to operate the railroad, that there may be excessive ground settlement, that the seawall could fail during the construction, that there could be "excessive water inflow through wall joints," that their proposed soil improvement may not result in adequate shear strength, and that there is a risk of grout getting into Puget Sound. See, work papers for 2005 CEVP cost estimate. We cannot assess how great any of these risks may be – they are simply risks the Project staff has identified for their alternatives and built into their cost estimates, but not told the public about in the EIS.

B-019-012

The environmental documents for this project meet the NEPA regulations set forth in the Code of Federal Regulations (40 CFR 1502) and the SEPA regulations in the Washington Administrative Code (WAC 197-11). The 2004 Draft EIS and 2006 Supplemental Draft EIS provided an appropriate evaluation of the proposed project at that time. In 2010, the project prepared a second Supplemental Draft EIS to analyze the Bored Tunnel Alternative. Please see the Final EIS for updated project information.

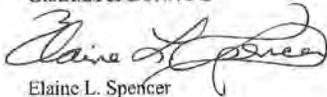
WSDOT
September 22, 2006
Page 19

B-019-012 effects and values in adequate detail so they can be compared to economic and technical analyses. It assumes the EIS need not include appropriate mitigation measures that are part of the proposal. It assumes the description of the affected environment can be general and need not allow the reader to understand the Project's impacts. It assumes the EIS need only analyze those alternatives that the Project proponent has previously determined will be considered, and need not analyze other alternatives that might feasibly attain or approximate the goals of the project but at lower environmental cost. None of those assumptions is supportable.

Only when an adequate EIS is issued can the Project move forward. If the Project is difficult and complex, with multiple adverse impacts, as it is, that is a reason why thorough environmental analysis is required early, not an excuse to put off environmental analysis until later. The EIS must include the actual mitigation to be provided, and where the impacts that cannot be mitigated are as serious as are likely to be the case here, all reasonable alternatives must be fully considered.

Sincerely,

GRAHAM & DUNN PC



Elaine L. Spencer

cc: Ivar's
Argosy, L.P.
Pier 57, Inc.
Martin Smith Inc.
Ye Olde Curiosity Shop
Elliott's Oyster House

ELS/alb

m31512-768363.doc

Exhibit A

Alaskan Way Traffic Counts

4-Aug-06

	Pier 66 West	Pike Hill Climb W	Spring Street East	Spring Street West	Seneca Street East	Seneca Street West	Total Counts
11:00 AM	-	-	22	69	-	-	91
11:15 AM	245	140	78	316	114	299	1,192
11:30 AM	237	175	98	318	187	303	1,308
11:45 AM	311	92	84	329	196	538	1,550
12:00 PM	268	80	151	407	230	278	1,432
12:15 PM	340	103	133	474	135	326	1,511
12:30 PM	443	72	149	517	243	361	1,785
12:45 PM	508	88	180	571	259	619	2,225
1:00 PM	517	96	136	569	253	511	2,082
1:15 PM	391	113	117	521	279	443	1,864
1:30 PM	469	142	143	543	214	415	1,926
1:45 PM	406	108	131	411	267	460	1,783
2:00 PM	467	74	152	491	224	516	1,924
2:15 PM	462	98	134	464	248	482	1,883
2:30 PM	307	85	165	523	223	342	1,645
2:45 PM	450	90	163	681	198	347	1,927
3:00 PM	470	104	141	542	235	333	1,825
3:15 PM	454	69	62	504	181	544	1,814
3:30 PM	387	52	100	586	259	455	1,848
3:45 PM	258	60	136	593	190	373	1,610
4:00 PM	376	63	173	661	171	367	1,810
4:15 PM	375	57	117	633	228	392	1,802
4:30 PM	384	62	117	406	206	315	1,490
4:45 PM	443	70	129	520	172	381	1,715
5:00 PM	357	86	123	460	154	472	1,652
5:15 PM	391	77	148	563	193	593	1,965
5:30 PM	349	49	104	401	210	417	1,530
5:45 PM	881	64	90	374	243	281	1,933
6:00 PM	375	45	101	432	142	291	1,406
6:15 PM	456	33	146	505	182	304	1,628
6:30 PM	354	56	135	483	170	208	1,406
6:45 PM	399	54	75	481	146	146	1,301
7:00 PM	349	38	102	523	113	224	1,349
7:15 PM	323	48	90	321	134	181	1,097
7:30 PM	246	60	69	452	139	292	1,269
7:45 PM	239	53	52	353	98	216	1,013
8:00 PM	357	55	109	422	145	168	1,257
8:15 PM	293	40	99	399	155	144	1,130
8:30 PM	213	37	84	316	129	99	978
8:45 PM	215	28	111	299	122	109	884
9:00 PM	208	20	43	174	101	116	662
	14,989	2,932	4,692	18,637	7,486	15,663	62,399
Peak Hour	2,061	459	813	2,473	1,013	1,988	8,097
Ave Hour	1,537	301	469	1,864	769	1,401	6,400
WaDOT winter pm	not counted	135	46	300	86	not counted	

At Madison St

Red Bold is average slot during day, applied to this daypart when counter took a break
Blue is the four peak counted 15-minute segments

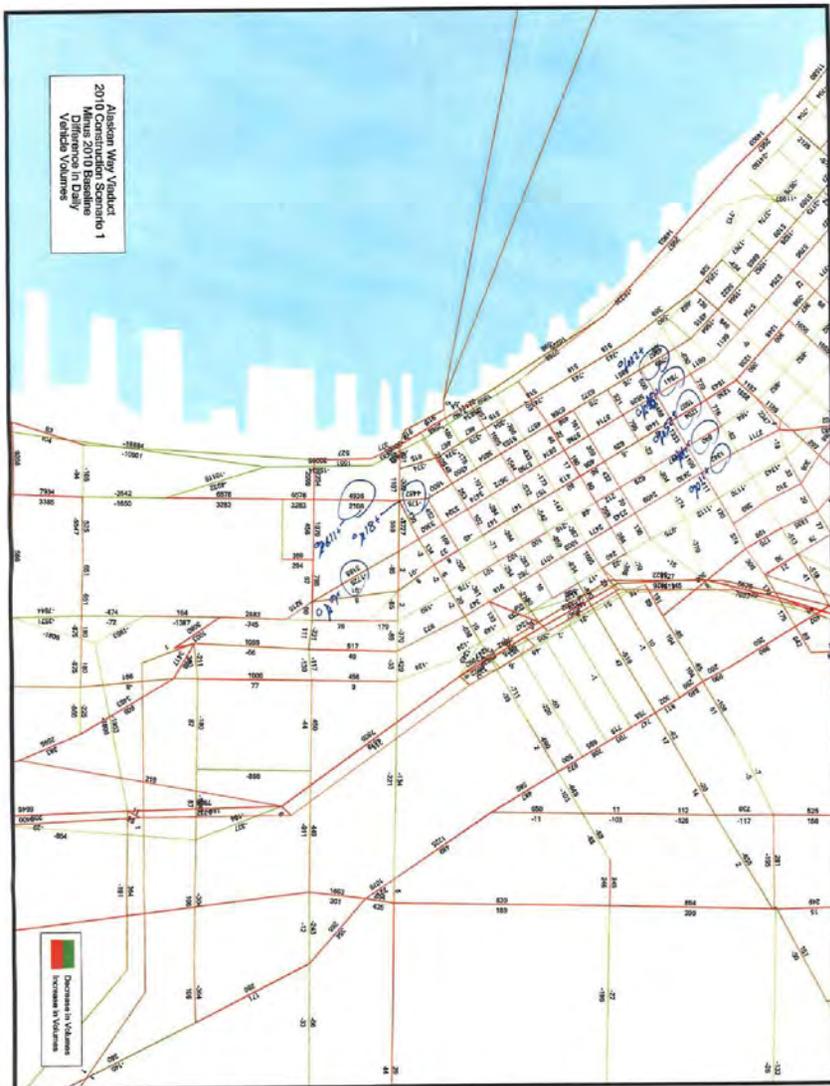


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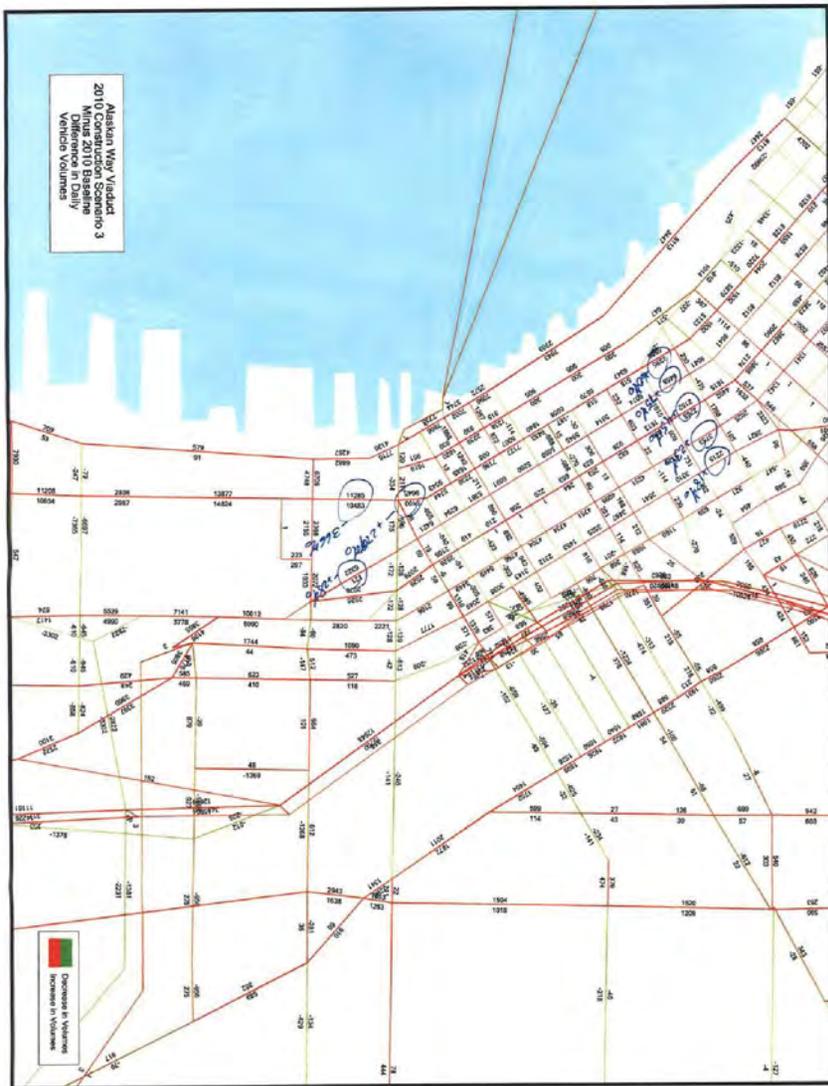


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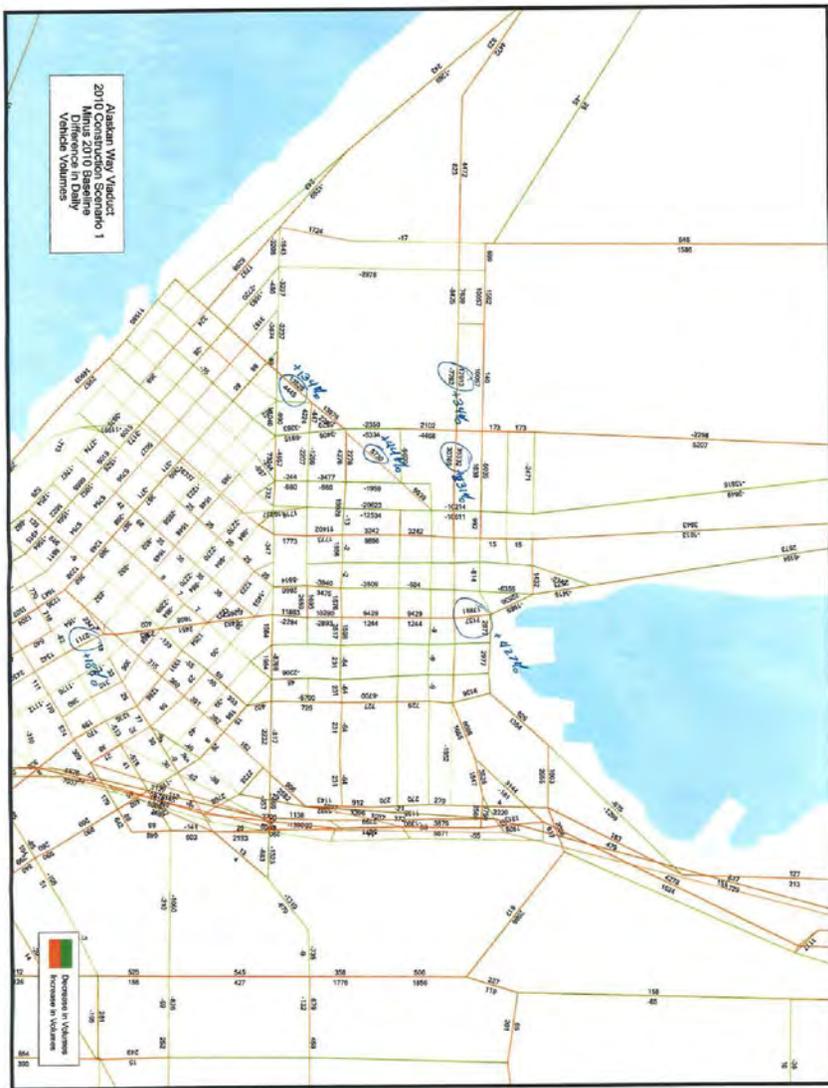


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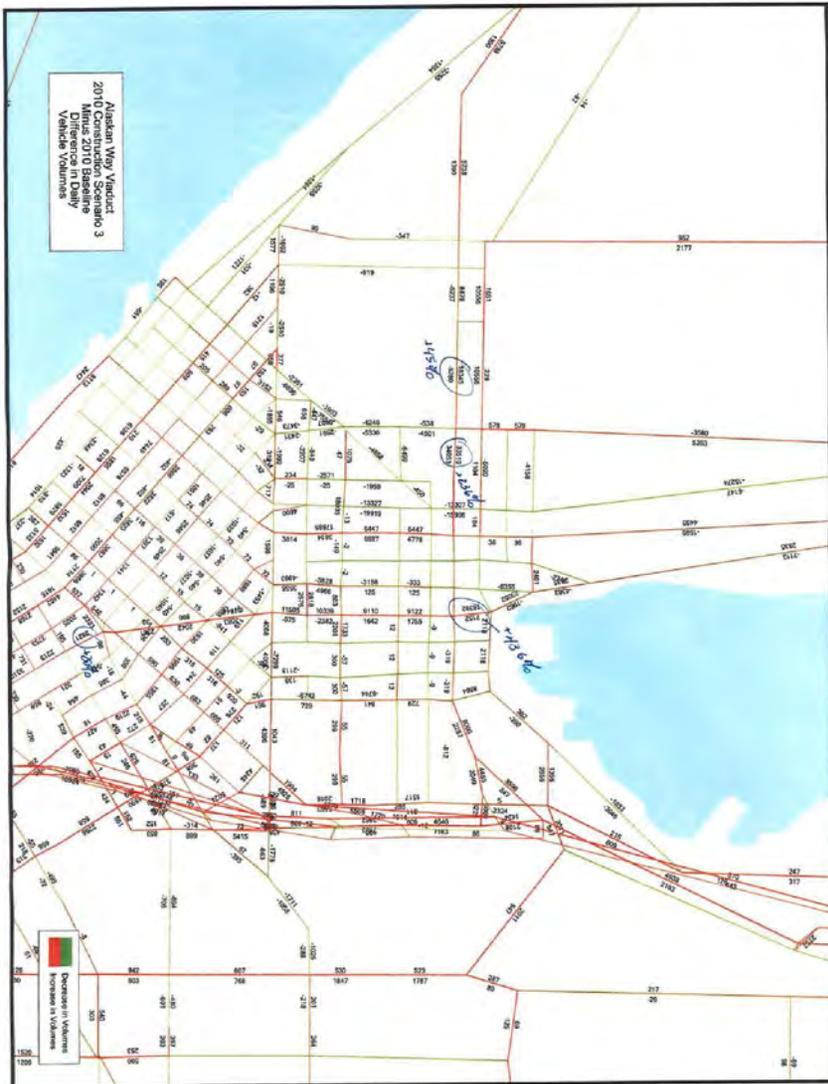


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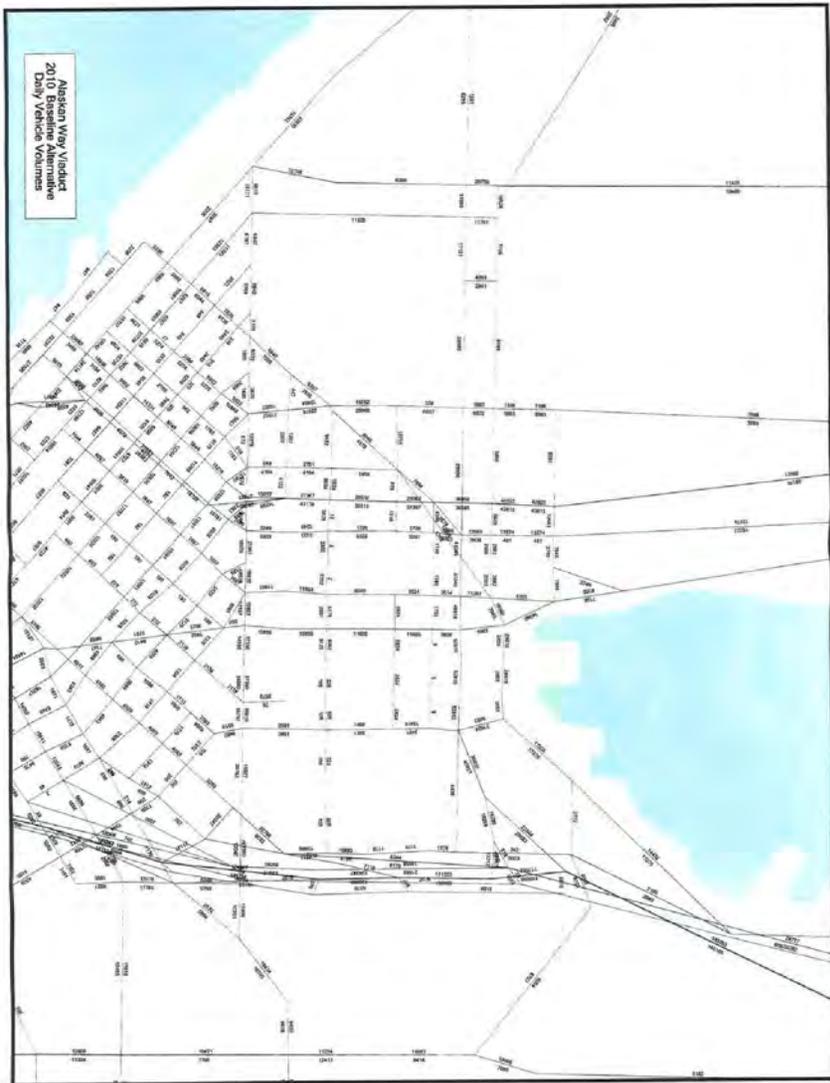


EXHIBIT B
Page 6 of 6



September 21, 2006

Kate Stenberg
WSDOT, Environmental Manager
Alaskan Way Viaduct and Seawall Replacement Project
999 Third Ave, Suite 2424
Seattle, WA 98104
awvsdeiscomments@wsdot.wa.gov

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

Dear Ms. Stenberg:

Puget Sound Energy (PSE) is the largest energy supplier (natural gas and electricity) in the State of Washington. We provide natural gas services to approximately 115,000 customers within the City of Seattle.

Puget Sound Energy is among many utilities that have facilities on, under, or near the Viaduct and Seawall. In addition to the Viaduct's role as a major, regional transportation thoroughfare, the Viaduct corridor also acts as a major "utilidor" for many utilities (including water, sewer, steam, natural gas, telecommunications, fiber optic cables, and electricity).

Puget Sound Energy has natural gas mains, services and a supply line located through, and under the current Viaduct footings directly proximate to the Viaduct. A 12" diameter natural gas supply pipeline serves PSE customers throughout Seattle and in other parts of King and Snohomish counties. Based upon the work we have done since 2004 assessing the replacement options, the following comments are intended to augment those we submitted for the DEIS in 2004.

B-020-001

1. PSE recommends the use of a master permit system to jointly permit all utilities so any potential permitting issues do not delay the overall project schedule. The FEIS should include preparation of a master utility relocation plan.

B-020-002

2. Projects of regional significance need to address all project impacts. Utility relocation costs are a construction impact for both public and private utilities and should be included in the estimated project cost.

B-020-003

3. Project work sequence, schedule and construction methods should be considered and designed to avoid more than one relocation of existing utilities. In order to provide safe, immediate, reliable service to our customers, PSE strongly recommends a utility relocation plan that accommodates one relocation of PSE's facilities when necessary for the transportation project.

B-020-004

4. PSE facilities need to be properly supported and protected during construction. To prevent impacts to utilities and as a mitigation measure, PSE should be included in the construction planning process, especially to determine the need to have a representative on site when work occurs near our facilities.

B-020-001

The project team has undertaken a coordinated permitting effort to ensure project permits and approvals are obtained in a timely manner. This includes:

- Working closely with the utility and design groups to ensure that appropriate permits are received during the life of the project
- Incorporating permitting in the project base schedule
- Working closely with the project schedulers to ensure permits are obtained in advance of all utility and construction work
- Holding early pre-application meetings with permitting agencies allowing early review of design plans and environmental documents
- Tracking permit requirements, permits and permit commitments in a project-wide database

B-020-002

Potential utility relocations are discussed in Chapter 6 of the Final EIS Appendix K, Public Services and Utilities Discipline Report.

Although costs are an important part of project planning and decision-making, they are not part of the NEPA environmental review process. However, overall project costs, which includes costs associated with utility relocation, are discussed in the overall project description and are certainly part of the lead agency decision making considerations. Costs of relocating private utilities located in public rights-of-way are generally borne by the utility and are not included in the project costs paid for with public monies.

B-020-003

The project's proposed construction sequencing, schedule, and construction methods for the alternatives are discussed in the Final EIS Appendix B, Alternatives Description and Construction Methods

- B-020-005** | 5. PSE will need to perform normal utility maintenance activities on its facilities before, during and after any required pipeline relocations that should be considered when determining final location of facilities.
- B-020-006** | 6. As a result of this project, PSE may need to relocate and restore services on private property associated with this work. Any final utility plan should reflect this issue.
- B-020-007** | 7. PSE plans to install a 16" diameter high-pressure (HP) gas main during the utility relocation. PSE would prefer that all of the 16" HP gas main be installed before transferring service from and deactivating the existing 12" HP gas main. PSE would prefer to be able to mobilize and demobilize only one time during the placement of the relocated HP main.
- B-020-008** | 8. PSE would like to address plans for connecting customers on the east and west side of the tunnel alignment. PSE would request that before the roadway is in its permanent state, PSE will be able to install customer connections.
- B-020-009** | 9. PSE gas piping would need to be supported and protected in place across excavation areas. PSE concerns for the crossings include: duration of pipe exposure, length of crossing/span, potential degradation of pipe coatings, design of crossings, differential settlement and PSE monitoring requirements.
- B-020-010** | 10. Impressed current corrosion protection of the seawall could require significant power. PSE would like to continue to be part of a coordinated corrosion protection plan for the project. Coordination among all parties will be necessary to design and build efficient corrosion protection systems. At utility crossings, PSE recommends including a common cathodic protection test station with leads to both utilities.
- B-020-011** | 11. PSE prefers not to work in joint trenches because of the different production rates of steel and plastic pipe due to the different welding/pipe fusion disciplines. PSE considers pipeline bedding, backfill and compaction important and will want to be involved in the inspection of this work for their facilities.
- B-020-012** | 12. PSE requests that the Intermediate Pressure (IP) gas main be located with consideration of best serving PSE customers.
- B-020-013** | 13. PSE continues to remain concerned about trenching methods. PSE does not favor the use of trenchless methods in this corridor because of concerns surrounding the guidance system interference caused by other utilities and buried obstructions.
- B-020-014** | 14. It is critical that representatives of Puget Sound Energy be included in the development and execution of any coordinated communication plan with the community, our customers and other stakeholders. This includes review of media releases that reference Puget Sound Energy work and meetings, and other interactions, with impacted businesses, residents, government agencies and the public.

Thank you for the opportunity to comment on the proposed Alaskan Way Viaduct and Seawall Replacement Project Supplemental DEIS. If you have any questions concerning these comments, please contact me at 425-456-2838 or susan.hempstead@pse.com.

Sincerely,

Susan Hempstead
Local Government & Community Relations Manager
PUGET SOUND ENERGY

Discipline Report. The development of the utility plans has occurred with input resulting from ongoing coordination with both the private and public utility providers to reduce the number of utility relocations to the extent possible.

B-020-004

The utility design has been developed with extensive coordination between the utility providers and the utility engineers. PSE has participated in this coordination. It is anticipated that such coordination will continue in future design phases as the utility designs are finalized. The need to have a PSE representative on site during construction will be determined during future design phases and reflected in project specifications as appropriate.

B-020-005

PSE, along with other affected private utility providers, has been and will continue to be included in meetings and other direct communications related to the utility relocation planning. The project utility design team is well aware of the critical need to maintain access to utility lines for continued operation and maintenance. These needs will be reflected in the design of the final utility locations.

B-020-006

The project design team will complete the design for private utilities to approximately a 30 percent design level. The design will then be handed off to the private utility for final design. Private utilities will each procure their own private property easements or franchise rights as needed.

B-020-007

A single mobilization and demobilization is preferred by all parties and will be reflected in the preliminary (approximately 30 percent) utility design plans. Private utilities will be responsible for final design.

B-020-008

There are utilities in addition to PSE that will need to be connected to customers before the roadway corridor is in its final state. The project will develop preliminary design plans to approximately the 30 percent level. The final design, including the sequencing of customer connections, is to be addressed by the private utilities.

B-020-009

The details for the support and protection of utilities that are temporarily exposed during roadway excavation can be addressed by PSE and other private utilities as they develop their own final design, following the project's completion of the 30 percent design phase. The lead agencies will continue to coordinate with PSE and other utility providers on issues such as this one.

B-020-010

Your concern is noted. Details for cathodic protection of utilities will continue to be developed in coordination with PSE and other utilities as design proceeds. Please note that the preferred Bored Tunnel Alternative does not include replacement of the seawall. However, the Cut-and-Cover Tunnel and Elevated Structure Alternatives do include replacement of the seawall.

B-020-011

PSE's concerns and preferences are noted. Coordination on design and contracting between PSE and the project will continue as the utility design proceeds.

B-020-012

The location of the Intermediate Pressure (IP) gas main will be determined as the design progresses, and will be coordinated with PSE.

B-020-013

PSE's concern is noted. Based on coordination between PSE and the project team, it is the project's understanding that horizontal directional drilling for other utilities under PSE gas mains can be addressed by having a well-defined entry point for the drill and that the entry point is a few feet back from PSE gas mains.

B-020-014

The project's communications team will ensure that PSE will have the opportunity to review any media releases or public notifications related to PSE work prior to public release.

From:Greg Blaine
To:AWV SDEIS Comments;
CC:
Subject:
Fw: Alaskan Way Viaduct and Seawall ReplacementProjectConstruction Plan Brochure
Date:
Monday, September 11, 2006 8:44:07 AM
Attachments:

The email below contains the comments that I recently sent to Ron Borowski at SDOT. He recommended that I also send them as comments and feed back to the Supplemental Draft EIS.

B-021-001

I must stress the importance of dedicated truck corridors out of West Seattle. We are a second generation moving and storage business, and we have been operating out of our West Seattle location for over 40 years. It is already, under current traffic conditions, very time consuming to for our trucks to access I-5, and/or get into down town during morning commuter traffic. Our customers won't pay us extra for our delays, and will only accept minor schedule changes in order to accommodate traffic delays. The loss of the Viaduct for an extended period of time will have an extreme adverse impact on our business.

We have maintained the location of our business in West Seattle because it is close to down town. Most of our competition has moved to the Kent Valley to take advantage of lower taxes and lower rents. Extensive delays during viaduct construction will in essence place us in double jeopardy. We will have higher taxes, higher rents, and the advantages of our location in close proximity to our customers will be lost. In a highly competitive service industry like ours, where profits are consistently single digit, we could be forced out of business in Seattle.

Greg Blaine
President
Continental Van Lines Inc.

>>> "Greg Blaine" <gregblaine@continentalvan.com> 9/5/2006 9:20 AM >>>

B-021-002

Ron, as a west Seattle resident and owner of a trucking company operating in West Seattle, I can speak from experience when it comes to traffic between West Seattle, down town, and the I-5 corridor. It's horrific during the peak hours to access and get through down town utilizing the viaduct, and it can be equally as bad to access I-5 at almost any given time between 6:00am and 7:00pm. Without dedicated truck corridors to get us into and/or through down town from West Seattle, I fear our Seattle terminal location will completely lose its viability. We can modify our schedules, and work smart to the best of our ability, but at some point there has to be enhanced capacity for truck traffic in this corridor or our company, as well as the rest of the freight community operating in this area, will experience traffic conditions that will kill our ability to compete.

These are my comments and ideas regarding the plan:

B-021-003

1. The bus only traffic lane over the West Seattle high rise is very underutilized, and will remain underutilized even if bus volume doubles. Consider making that lane open to buses as well as trucks. Trucks and buses have the same maneuverability characteristics, slower speed characteristics on steep grades, and are driven by

professional drivers. They would mix well together, and the remaining lanes over the high rise would be less encumbered by slow moving trucks.

B-021-001

The Final EIS addresses the economic cost of congestion for the construction phase of the project within the limits of the data provided by transportation modeling. The updated discussion of economic impacts associated with freight mobility were described in the Appendix L, Economics Discipline Report, of the Final EIS. The Final EIS also includes an evaluation of impacts to freight mobility. Mitigation measures, which include a traffic management plan, are presented in Chapter 8 of the Final EIS and in Appendix C, Transportation Discipline Report. These measures cannot alleviate all of the construction impacts, but will provide some relief. The importance of the corridor for freight, and for the local and regional economy, is understood and efforts to minimize the impacts during construction will continue.

B-021-002

A dedicated truck corridor is not proposed on SR 99 due to limitations on the total number of lanes that can be provided on the corridor, the relatively small share of truck traffic compared to total users, and general-purpose capacity requirement associated with peak period auto demand. Off-peak traffic conditions are generally not congested on SR 99. The issue of overall freight mobility is an important one; please see the Final EIS for proposed mitigation measures to reduce effects to freight mobility.

B-021-003

This project is not considering changes to the West Seattle Bridge. Use of the dedicated bus lanes for moving freight is not recommended due to the potential merging impacts that could be experienced at the end of the lane under higher vehicle loads. Additionally, allowing trucks in transit lane would likely impede operations for transit vehicles as grades on the West Seattle Bridge would induce slower climbing speeds for trucks, thereby backing up transit buses and causing further delay.

B-021-004

2. Consider the same as above for the 1st Ave. south corridor peak restrictions. This could be taken one step further, no parking along first Ave south, give the busses exclusivity to the right lanes, the center lanes for buses and trucks together, and trucks get the left lane. Educate our local trucking companies, as well as the bus drivers that they must cooperate and yield to each other when lane changes are required.

B-021-005

3. Restrict lower bridge traffic to trucks, busses, and local access only. This keeps the upper bridge free of slow moving vehicles while still giving trucks and busses a dedicated route into the city. No bridge openings during peak traffic hours, or better yet scheduled bridge openings only.

B-021-006

4. Dedicate a truck traffic corridor between West Seattle and I-5 NB utilizing the 1st south bridge and Michigan street.

B-021-007

5. West Seattle Ferry improvements: Significantly expand on site parking on West Seattle side or have a close by off site lot with shuttle service to the dock. The Ferry needs to run late so that dinner goers, theater goers, late shoppers, base ball fans, etc.. have a round trip ferry alternative that doesn't require a lengthily bus trip on the West Seattle side.

Thanks for the update Ron. I will look forward to additional information as it becomes available.

Greg Blaine

B-021-004

The City of Seattle designates all principal arterials as truck streets and has also classified certain streets as Major Truck Streets. By policy, the City will “monitor these streets and make operating, design, access and/or service changes, as well as capital investments, to accommodate trucks and to preserve and improve commercial transportation mobility and access on these major truck streets.” First Avenue S. is currently designated as a Major Truck Street by the City of Seattle.

While First Avenue S. is a Major Truck Street, it is also an important transit corridor serving West Seattle and communities to the south. Adding exclusive use lanes on First Avenue S. for buses and freight would reduce vehicle carrying capacity in the corridor and likely cause more congestion, particularly during peak travel periods. The City will likely continue to monitor this facility and work with Metro and the freight community to determine if joint use by transit and freight is feasible.

B-021-005

The Southwest Spokane Street Swing Bridge opens on demand, even during rush hour traffic, due in part to tidal fluctuations and the resulting limited window for allowing certain types of marine vehicles to pass under the bridge. While the lower bridge could be prioritized for use by freight, restriction of use is not proposed since the route does serve some general-purpose users as well. Restricting buses and freight traffic to the Spokane Street Bridge would likely divert more traffic to the already congested upper West Seattle Bridge, further impeding general purpose, freight, and transit operations on that bridge. Of particular concern are those West Seattle express buses that access downtown via SR 99, which would likely encounter longer travel times during the peak commute hours if traffic was diverted from the lower bridge.

B-021-006

This proposal is beyond the project area, though such a change could be considered for implementation during the construction period.

B-021-007

For more information on the proposed mitigation measures, please refer to the Chapter 8 of this Final EIS.



September 15, 2006

Kate Stenberg
Alaskan Way Viaduct and Seawall Replacement Project
c/o Washington State Dept of Transportation
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Stenberg,

B-022-001

As the owner of a prominent building located on Seattle's waterfront, I feel a responsibility to voice my objection to the replacement of the Alaskan Way Viaduct. I have lived in Seattle all my life and have owned the commuter building, across from Coleman Dock, for many years. Like many people in Seattle, I have always had a "love/hate" relationship with the Viaduct. While we use it to navigate through the city, we seem to ignore the fact that it's an eyesore and has encouraged festering social problems.

Recently my sister-in-law visited from out of town and was excited to visit Seattle's storied waterfront. After parking beneath the viaduct, her eager anticipation quickly turned to dismay. As we stepped out of the car, our senses were assaulted by cars screaming overhead, smells of rotting garbage and human waste, and aggressive panhandlers. My sister-in-law's response was "How disgusting! Why in the world would Seattle let this happen to one of their greatest assets?" I had to agree with her.

In a Seattle Times article about the building of the original viaduct, John A. Thiry Sr., the designer of the Seattle Center grounds for the 1962 World's Fair predicted in 1947: "A two-deck will be so high, it will block off all bordering buildings from the bay. And I've never seen an overhead construction in any city that didn't create slum conditions all around it."...and that's what happened.

The Viaduct had done its job, moving people from place to place, but times have changed and our city should reclaim one of its greatest assets. Seattle's downtown waterfront should be a place that is revered and celebrated by its citizens and visitors. Repairing or replacing the current Viaduct will not solve this problem. The people of Seattle and its visitors deserve a safe, clean, scenic, and traffic free waterfront that only the proposed underground tunnel will produce. I've seen great examples in Europe, San Francisco, Portland, and Vancouver B.C. of welcoming waterfronts with no barriers. I urge the

Windermere Services Company

5424 Sand Point Way NE • Seattle, WA 98105 • 206/527-3801 • Fax 206/526-7629 • E-mail wsc@windermere.com

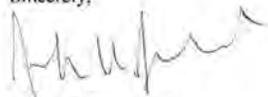
B-022-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2006 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2006, please refer to the Final EIS for current information.

B-022-001

WSDOT, City Council, Governor, and Legislature to find a way to make the tunnel option a reality, or if economics don't work, tear it down and leave it down!

Sincerely,



John W. Jacobi

P.S. Please find an article by William Weis, which represents my sentiments, enclosed.

Enclosure

Cc: Governor Gregoire, Representative Frank Chopp, Seattle City Council

Tear down viaduct for a great city

GUEST COLUMNIST

WILLIAM WEIS

One distinctive feature of every great city is its ability to move people into and out of its center—and its resolve to keep through traffic far away from its heart and core. Consider this before dismissing the call to permanently remove the Alaskan Way Viaduct.

To argue for a highway going through the center of Seattle is to argue that Seattle should forfeit its urban center to provide a freeway link between Everett and Tacoma or between Shoreline and Olympia. That is precisely the kind of addled thinking that has destroyed most of the United States' once gleaming cities: Detroit, Atlanta, Miami, Toledo, Phoenix, Houston, Dallas, Los Angeles (yes, even Los Angeles was once a city, not so very long ago), and on and on. Not one of those examples survived the delusion that somehow building throughways through their urban cores would save them—and not one will ever be a city again.

We've been lucky in Seattle. Something is still left of an urban

center—but what is left is precarious and can survive only so many ill-begotten stadiums, lost mass transit opportunities, failed urban parkland initiatives and highways—including Interstate 5—through its town center. Great cities are not hosts to such scars as the Alaskan Way Viaduct. Would you expect to see a freeway dissecting the center of Paris? London? New York? Vienna? Rome? Vancouver?

Vibrant cities worry about how to get people into their centers and out of their centers—but never through their centers. In our case, the state Department of Transportation would like Seattle to sacrifice its soul to move cars and trucks up and down the I-5 corridor—to move people from one side of Seattle to the other. The Seattle City Council and the mayor's office should give notice to DOT, now, that downtown Seattle will no longer be an available alternative for moving cars and trucks from the north to the south of the state. Nothing—nothing—of urban essence will be lost by adding a few more dozen lanes to highways passing through Bellevue, which has no aspirations of ever becoming a city.

The existing infrastructure of

state Route 99 can be fully used in a system of access and exit points to move cars and trucks quickly into, and out of, the downtown Seattle grid. And that can be accomplished far more efficiently than is done by the current viaduct, which is clogged by vehicles passing through (more than 70 percent, even during rush hour) rather than going to and from Seattle. That will free up the north and south directions on SR 99 for people coming to and from Seattle, which is all that our city planners should be concerned about.

Thanks to earthquake vulnerability, we face an unexpected opportunity to begin turning back the movement to destroy what's left of Seattle as a city. Focus on how to make the waterfront and its adjacent spaces the commercial and residential center of Seattle, as are most all waterfronts in great cities with such fortunate geography. Mayor Nickels, tear down this viaduct!

William Weis, Ph.D., is director of the MBA Program at Seattle University's Albers School of Business and Economics.

ORAL TESTIMONY

H-001-001
1
2
3 TESTIMONY OF CAROL URE: I live on Alaskan Way, so
4 I'm extremely interested in the length of time that the
5 construction will go on, and the amount of disruption that
6 will take place, which is understandable, it's going to
7 have to happen. But I would have liked to have seen in the
8 Environmental Impact Statement a discussion about what
9 could be done to shorten the lengths of construction
10 period.

H-001-002
11 Also, I would like to see a discussion about the
12 cost of the fly-over bridge and whether or not, since
13 there's no money for the whole project, whether that is
14 something that should be put aside and not waste the money
15 building a temporary fly-over bridge.

16 That's the main thing. Neither of those is
17 discussed in the Environmental Impact statement. So,
18 that's what I'd like to see happen.

19 JACK VAN KINSBERGEN: Okay. I live at 1950
20 Alaskan Way, down on the waterfront. And while there's a
21 lot of things about this that I support, I have a lot of
22 problems. I have problems with something specific, and it
23 has to do with the picture that's on Page 143 of the
24 Draft E.I.S. It's a picture of a temporary bypass viaduct,
25 if you will, fly-over, from the Battery Street tunnel to

H-001-001

The lead agencies have continued to consider a multitude of options and the trade-offs involved in shortening the construction duration for the project. The 2006 Supplemental Draft EIS included analysis for a shorter construction plan (closed corridor), intermediate construction plan (partially closed corridor), and longer construction plan (partially open corridor). The 2010 Supplemental Draft EIS also analyzed a construction plan for the Bored Tunnel Alternative. Since the 2006 and 2010 Supplemental Draft EISs, the construction plan for each alternative continued to develop and is presented in the Final EIS. Appendix B, Alternatives Description and Construction Methods Discipline Report, also contains a detailed description of the length of construction and how the preferred alternative would be built.

H-001-002

The Battery Street Flyover Detour is no longer being considered. Please see the Final EIS for current information about detour routes needed for each alternative.

ORAL TESTIMONY

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23 has to do with the picture that's on Page 143 of the
24 Draft E.I.S. It's a picture of a temporary bypass viaduct,
25 if you will, fly-over, from the Battery Street tunnel to

H-002-001

After the 2004 Draft EIS was issued, numerous comments were received relating to the visual impacts and other negative effects of the Battery Street Flyover Detour. As the design plans for the Cut-and-Cover Tunnel and the Elevated Structure Alternatives evolved, the Battery Street Flyover Detour was eliminated.

H-002-001

1 Alaskan Way. And it will go right in front of where I
2 live, and I will be looking at traffic going by at 50 miles
3 an hour, 20 feet from my terrace. Which, you know, I guess
4 if we have to handle it, we have to handle it. I have some
5 concerns with this.

6 This is supposed to be temporary. If the project
7 doesn't raise all the money it expects to get, and it gets
8 partly into the project, this temporary viaduct could be
9 there a very long time. So, I'm concerned that they will
10 start the project without enough money, and leave this
11 thing up.

12 Another thing that bothers me is to build this
13 temporary fly-over, it's going to cost hundreds of millions
14 of dollars and add years to the project. And I'm not sure
15 that the rest of the state is going to appreciate spending
16 that kind of money to keep traffic flowing during this
17 construction period. This money could go to the
18 520 Bridge, it could go to east side projects. They're not
19 going to be very happy he about that. What we should be
20 trying to do is get this project done and over as soon as
21 possible. Hundreds of millions of dollars is not
22 available, to start with.

H-002-002

23 The issue I have is it looks to me like this project
24 is taken as a given that they have to keep traffic flowing
25 while the project's going on. They haven't particularly

H-002-002

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

1 studied alternative ways of keeping the traffic flowing.
2 And so, it seems to me it's almost like a given, and a
3 prerequisite, and I don't accept that given, and I don't
4 accept that prerequisite. There are other alternatives
5 that ought to be evaluated.

6 People in West Seattle are going to have a problem
7 when the viaduct is under construction. Ferry service to
8 West Seattle is an alternative. There are things that can
9 be done to significantly improve traffic flow during all of
10 this, and I don't think that has been studied.

11 The way this project is going it looks like the
12 waterfront is going to take the entire hit. And while
13 we're willing to take a hit, we think that it needs to be
14 shared, and that there are ways to get traffic flowing for
15 the City, and spending hundreds of millions of dollars
16 adding years to the project is just going to increase the
17 pain, and it hasn't been justified.

18 And the major comment here is that the Draft E.I.S.
19 does not adequately cover this subject. It's almost as if
20 it was a prerequisite that they have to keep this traffic
21 flowing, and they haven't looked at alternatives to keep it
22 flowing. All they've looked at is an alternative that adds
23 years and lots of money to the project. Adding those
24 years, spending that money, I don't see in the Draft E.I.S.
25 the justification for doing that, and I think that's a big

1 whole in the Draft E.I.S.

2 **PENNY SWANBERG:** My name is Penny Swanberg and my
3 home is on Alaskan Way. I'm just concerned that no
4 alternative regarding traffic control or stopping of
5 traffic has been mentioned, which would save the time of
6 construction, maybe two years, and also maybe a half a
7 billion dollars or more. And I'm talking with regard to
8 The Old Pass down Alaskan Way.

9 And that's basically my concern, besides all the
10 dust and the noise, and the disfigurement of Alaskan Way,
11 which they've been trying to build, make attractive to
12 tourists, since the '70's, when it was not very
13 attractive. And I hate to go back to that disruption, to a
14 disruption of that kind.

15 **JANICE BLAIR:** My name is Janice Blair, and I live on
16 the waterfront on Alaskan Way. And I'm concerned that the
17 E.I.S. didn't address the traffic during the interim,
18 especially during cruise season. Right now, during cruise
19 season, the streets are clogged already, and I don't think
20 that they have figured out or have thought about how
21 they're going to keep those trucks moving as they come to
22 supply the cruise ships.

23 Also, I didn't see how they're going to work with
24 the noise and the dust. I'm thinking about not only the
25 residents on the waterfront, but tourists and other people

H-003-001

1 whole in the Draft E.I.S.

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3 home is on Alaskan Way. I'm just concerned that no
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H-003-001

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22 supply the cruise ships.

23 Also, I didn't see how they're going to work with
24 the noise and the dust. I'm thinking about not only the
25 residents on the waterfront, but tourists and other people

7

H-004-001

Since the 2004 Draft EIS was published, additional traffic analysis has been conducted as presented in the 2006 and 2010 Supplemental Draft EISs, and the Final EIS. Please see the Final EIS for current information regarding traffic impacts during construction.

H-004-002

Mitigation measures for traffic, noise, and dust are presented in Appendix C, Transportation Discipline Report; Appendix F, Noise Discipline Report; and Appendix M, Air Discipline Report, of the Final EIS.

H-004-001

H-004-002

H-004-002

1 from the area that want to come and enjoy the waterfront,
2 and what that would do to the businesses, with all of the
3 dust and noise at that time. Having people on the water
4 front is what keeps it vital.

H-004-003

5 And there's the public safety issue as well. With
6 more people down there, things are safer, and I'm afraid
7 that they haven't really covered those issues.

8 **BONNIE COLLETT:** I am Bonnie Collett, and I reside
9 at 1425 Western Avenue, in Seattle. Our collective
10 concerns in our condo unit, or our condo group, is that the
11 E.I.S. needs to establish a forum for residences and
12 businesses adjacent to the project site who work with the
13 design team to assure that concerns about construction
14 impacts are met, develop a clear process by which claims
15 for any damage to adjacent properties can be met and fully
16 compensated. The full disclosure of project insurance
17 levels or self-insurance of W.S.D.O.T. should be made.

18 Locate the Pike Street ventilation buildings and its
19 stacks some place other than Pike Place Market hill climb.
20 There's a lot of children who play in the daycare there,
21 there's tons of tourists that come by, and it's not a good
22 idea.

23 The E.I.S. needs to address the release of
24 concentrated pollutants and their affect on residential
25 property directly adjacent to proposed ventilation stacks.

8

H-004-003

As part of the ongoing public involvement process, the project will continue to coordinate with the residents, businesses, and property owners along Alaskan Way through meetings, open houses, newsletter updates, and e-mail. Mitigation measures addressing noise, parking, traffic, dust, and other factors are included in the Final EIS and appendices. The lead agencies will continue to refine construction mitigation for the preferred alternative's construction sequencing and methods. The mitigation measures may also become part of the permit conditions required for the project.

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2 and what that would do to the businesses, with all of the
3 dust and noise at that time. Having people on the water
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24 concentrated pollutants and their affect on residential
25 property directly adjacent to proposed ventilation stacks.

H-005-001

WSDOT is currently preparing a claims process that would address any damage to property directly related to the Bored Tunnel Alternative. This information will be given to individual property owners that may be affected by the project. WSDOT plans to install an array of monitoring equipment to alert the construction team of any settlement which would be used in the claims process. There are specific impacts that WSDOT can compensate for such as excessive noise and vibration levels or damage to property. However, impacts that are not quantifiable are generally not compensable. If you experience impacts during construction, please call our 24-hour hotline, 1-800-AWV-LINE.

H-005-002

An exhaust stack near Pike Place Market is no longer included in any of the alternatives. The preferred Bored Tunnel Alternative would have two tunnel operations buildings that include exhaust stacks. One building would be located in the south portal area near Alaskan Way S. and Railroad Way S., and a second building would be located in the north portal area near Sixth Avenue and Harrison Street.

H-005-001

H-005-002

H-005-002

1 What are the affects of the constant exposure to the fumes
2 from the ventilation building? What type of particulate
3 matter will be released, and what are the health risks?

H-005-003

4 The E.I.S. should also address the change in
5 character of the ambient noise resulting from the frequency
6 and steady sound of the fans. These concerns should affect
7 a location for the building to a non-residential area. We
8 ask that you limit construction noise that exceeds the City
9 of Seattle Residential Nighttime Noise Regulation to
10 nonresidential areas of the project site. Appendix F
11 states that City noise levels are expected to be exceeded
12 in the nighttime, and this is not acceptable in a
13 residential area.

H-005-004

14 Phase the construction adjacent to
15 Hill Time Court to maintain parking garage access onto
16 Alaskan Way, integrate safe access into the final design,
17 provide adequate dust control during demolition, and
18 develop programs to keep the area businesses alive during
19 the project period. Having people continue to access the
20 area shops and restaurant will enhance the safety of the
21 adjacent neighborhoods. Thank you.

22 ARTHUR M. SKOLNIK:. My name is Arthur M. Skolnik.
23 I'm a fellow of the American Institute of Action. I'm a
24 land use consultant. I live at 2515 Fourth Avenue,
25 Apartment 2702, Seattle, Washington 98121.

9

H-005-003

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Under normal daily operations, tunnel ventilation fans are subject to the noise level limits of the Seattle Noise Ordinance and must meet Seattle property line noise limits. Ventilation fans would be designed not to exceed 57 dBA at the property line of the nearest residential use during normal operation hours. If the fans would normally be operated during nighttime hours (10 p.m. to 7 a.m. on weekdays and 10 p.m. to 9 a.m. on weekends) they would be designed not to exceed 47 dBA at the property line of the nearest residential use during nighttime hours.

Construction of the project will require nighttime construction activities, and the City will require a Major Public Project Construction Noise Variance. Construction noise mitigation requirements would be developed and specified in the noise variance.

H-005-004

We acknowledged your concerns as a neighbor adjacent to the existing viaduct and project construction area. The project will continue to coordinate with the residents and businesses along Alaskan Way through meetings, open houses, newsletter updates, and e-mail. Mitigation measures addressing noise, parking, traffic, dust, and other factors of specific interest to residences and businesses are included in Chapter 8 of the Final EIS.

1 What are the affects of the constant exposure to the fumes
2 from the ventilation building? What type of particulate
3 matter will be released, and what are the health risks?

4 The E.I.S. should also address the change in
5 character of the ambient noise resulting from the frequency
6 and steady sound of the fans. These concerns should affect
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23 I'm a fellow of the American Institute of Action. I'm a
24 land use consultant. I live at 2515 Fourth Avenue,
25 Apartment 2702, Seattle, Washington 98121.

H-006-001

1 I'm here to provide comments regarding the adequacy
2 of the Draft Environmental Impact for the Alaskan Way
3 Viaduct Seawall Project.

4 First I want to express my deep concern and
5 opposition to the way this public hearing open house is
6 being conducted in contrast to historical examples of
7 public hearings and the ability for citizens to comment and
8 have other citizens be able to hear and acknowledge or
9 refute in their comments other comments from their fellow
10 community members. I strongly request that the comment
11 period be extended and that the State D.O.T. set three
12 additional public hearing dates that are not open houses
13 whereby the public can comment in the traditional form,
14 with an open mic, with a sign-up sheet, with limited times,
15 and the general public and media is allowed to hear those
16 comments. I feel this is a breach of the State and
17 National Environmental Policy Act, the way this is being
18 carried out.

H-006-002

19 Now to my comments about the Draft E.I.S. I feel
20 there is a bias in the Draft E.I.S. that has created
21 alternatives that reflect the most expensive options. They
22 are trying to come up with designs that deal with both the
23 replacement of the infrastructure, as well as dealing with
24 the construction phase. Most examples in the Draft E.I.S.
25 deal with keeping traffic flowing during construction.

10

H-006-001

We understand that members of the public may prefer different ways to share their comments. In order to encourage as much feedback as possible, we provided several options. At the hearings, attendees could submit comments on a written form, on a computer using an electronic form, or verbally to a court reporter. In addition to the meetings, the public could submit comments by mail or e-mail to the program team. The program team often holds open house-format public meetings to provide as much flexibility as possible to the public. With an open house format, hearing participants are able to come and go to the meetings as their schedules allow, making the meetings more convenient for many people.

H-006-002

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

H-006-002

1 That aspect of the designs extends the length of the
2 construction project by two times, which leaves this mega
3 project open to cost overruns and construction
4 interruptions that go on for 9 to 11 years. The options
5 that are being proposed need to be addressed in terms of
6 their possible shortest construction period, and that does
7 include not keeping traffic flowing in that corridor during
8 the construction period. We need to have a more adequate
9 discussion of creating the best preferred alternative in
10 the shortest period of time, and still allow the flow of
11 vehicular traffic within the City of Seattle during
12 construction, not necessarily in the construction
13 corridor.

H-006-003

14 Specifically, I feel that the Draft E.I.S. does not
15 adequately allow for an intelligent discussion of the
16 impacts that will be felt by the businesses and residences
17 and the tourist industry along the Alaskan Way, during
18 construction and even before construction. We need to
19 understand what the economic impacts will be, what the
20 business interruption costs will be, and how to develop
21 mitigation compensation so that we don't "throw the baby
22 out with the bath water."

23 The State D.O.T. must adequately address all the
24 aspects of this project to a level of specificity that
25 allows the public to understand the project and then make

11

H-006-003

Economic impacts are discussed in the Final EIS and Appendix L, Economics Discipline Report, of the Final EIS.

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. After the 2004 Draft EIS was published, your comments along with others led to additional planning, analysis, and the revised alternatives presented in the 2006 Supplemental Draft EIS. Following publication of the 2006 Supplemental Draft EIS, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information regarding permanent project effects and temporary construction effects. The content and level of analysis conducted for this document is consistent with the level of design and more than adequate to inform the public and decision-makers of the probable consequences resulting from the project or from inaction.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2004 Draft and 2006 Supplemental Draft EISs, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to

H-006-003

1 decisions, whether it means selling your home, closing your
2 business, deciding not to take a cruise ship, or not attend
3 the Seattle Aquarium, because of the disruption. That is
4 not discussed in the Draft, and it is a serious omission.

5 I'll leave it at that. Thank you.

6 ROBERT NOKES: My name is Robert Nokes. I am a
7 homeowner in the Alaskan Way neighborhood, and you don't
8 need my address. I have read the E.I.S. Statement and I
9 think there are some deficiencies in the Statement that
10 need to be talked about.

11 But before I go into that, I would like to, for the
12 record, say that I think this kind of a forum is not an
13 appropriate way in which to hear all of the public's
14 comments with respect to the E.I.S. I think the State
15 Department of Transportation should reconsider having more
16 public meetings and having true public testimony, because I
17 think the fair bid can be gained by people speaking in
18 public and feeding on each others ideas, and flushing out
19 the full issues that are in front of the D.O.T. I see this
20 kind of a process, the open house process, as a way to kind
21 of divide and conquer the neighborhood, by isolating people
22 and having them only put their information directly to
23 either a court reporter or through a computer process. It
24 denies everyone the possibility of hearing others' opinions
25 and having actual hearing examiners, with some authority,

12

identify the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront.

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2 business, deciding not to take a cruise ship, or not attend
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H-007-001

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H-007-001

H-007-001

1 who actually listen to those opinions and help develop
2 their opinions with respect to E.I.S. Statement.

H-007-002

3 As to the D.O.T. E.I.S. Statement itself, I think
4 there are some deficiencies. I've been a resident of the
5 Alaskan Way neighborhood for a number of years, and I can
6 say it's a very vital neighborhood. I think, not only do
7 we have a large residential population on Alaskan Way, we
8 have also benefitted from a great deal of money and effort
9 by the Port of Seattle to develop Pier 66. There has been
10 a lot of private money in the development of the Marriott
11 and other properties along the waterfront, and it is a very
12 vital neighborhood. It is, in many respects, a gateway to
13 Seattle for many, many travelers that come to see our
14 city.

15 I would say that most visitors to Seattle remember
16 two or three things about their visit. One is the
17 waterfront, Pike Place Market of course falls under that,
18 as well as the Space Needle, maybe even the Ballard Locks
19 from time to time. But my concern is if the
20 E.I.S. Statement doesn't carefully consider the true costs
21 of trying to build this project while never interfering
22 with traffic flow, as it is currently defined, that we may
23 drive away a whole generation of potential visitors to
24 Seattle.

25 I'm thinking, in particular, about the additional

13

H-007-002

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

After the 2004 Draft EIS was issued, numerous comments were received relating to the visual impacts and other negative effects (including the cost) of the Battery Street Flyover Detour. As the design plans for the Cut-and-Cover Tunnel and the Elevated Structure Alternatives evolved, the Battery Street Flyover Detour was eliminated primarily due to these impacts.

H-007-002

1 expense of the throughway that they're calling a temporary
2 bridge, while the route traffic during construction of this
3 project. First of all the E.I.S. Statement does not talk
4 about what is the true cost of that, how much extra time
5 will it take to build that and tear it down and, as a
6 result, how much extra money is it truly going to cost
7 Seattle to continue routing traffic during one instruction
8 phase.

H-007-003

9 My concern is if this D.O.T. doesn't carefully
10 consider the alternatives, i.e. not continuing to route all
11 traffic during this period, and allowing a reconsideration
12 of routing traffic through other venues in downtown
13 Seattle, or the I-5 corridor, without careful consideration
14 of that, we may be expending so much money for a very
15 temporary result, that no one truly even is able to
16 identify. Not only is there a cost of building and tearing
17 down, there is cost of potentially destroying this
18 neighborhood, driving away tourist traffic, destroying most
19 of the businesses on the waterfront, perhaps even driving
20 away cruise ship traffic to Seattle. All of those indirect
21 expenses to Seattle, I think, can add up to be a very, very
22 large number.

H-007-004

23 If a construction period is for four or five years,
24 it's conceivable to get through that process and still have
25 a vibrant waterfront area for visitors. My concern is if a

14

H-007-003

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. After the 2004 Draft EIS was published, your comments along with others led to additional planning, analysis, and the revised alternatives presented in the 2006 Supplemental Draft EIS. Following publication of the 2006 Supplemental Draft EIS, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2004 Draft and 2006 Supplemental Draft EISs, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to identify the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront.

H-007-004

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS,

H-007-004

1 construction period lasts for 10 years, it may well teach
2 an entire generation of people that Seattle is nothing more
3 than a construction zone, and destroy the vitality of the
4 downtown.

H-007-005

5 In addition to those costs there are the potential
6 destruction of property values and, therefore, the tax
7 revenues that will be generated for the values of the
8 properties on the waterfront. So, I think this has a
9 potential negative impact, if it isn't carefully thought
10 through.

H-007-006

11 There has been recent press, a group suggesting that
12 we just tear down the Alaskan Way Viaduct and not rebuild
13 it. I don't advocate that. But I do think it would be a
14 very valuable exercise to figure out what the traffic
15 patterns in Seattle would be, and how they could be
16 minimized, the problems resulting from that, how they could
17 be minimized, as a way to improve the project plan for the
18 Alaskan Way Viaduct reconstruction.

H-007-007

19 In addition to these concerns, I also have pure
20 financial concerns, with a finance background. If the
21 project is going to take 10 years instead of 5 years,
22 there's a much larger opportunity for losing money through
23 interest rate increases, through construction increases, or
24 through inflation, and it strikes me that careful
25 consideration needs to be taken in trying to shorten the

15

many people asked the lead agencies to consider more than one construction plan. To respond to this question, three different construction plans were developed and evaluated in the 2006 Supplemental Draft EIS.

FHWA, WSDOT, and the City of Seattle are committed to communicating and coordinating with the downtown and waterfront neighborhoods and businesses through open houses, community briefings, newsletter updates, and e-mail. The lead agencies are also committed to implementing construction mitigation measures to offset the impacts of construction on the downtown area as much as possible. Proposed construction mitigation measures are discussed in the Final EIS.

H-007-005

There will be a slight decrease in the number of properties paying property taxes as some properties are converted from private use into public right-of-way at the beginning of construction. The effect of this is that the tax burden is redistributed to the remaining parcels in King County that do pay property taxes.

At the end of construction, and depending on the final design, there may be some parcels that previously were right-of-way that are no longer needed and can be sold and returned to the inventory of property tax-paying parcels. This would offset the effect on property taxes that will occur at the beginning of construction.

During construction, the effect on the value of an individual parcel as measured by its sale price, and the resultant effect on the assessed value for tax collecting purposes, is dependent on a great many factors and cannot be calculated without speculation. It should be noted that during the Central Artery Project in Boston, the rate of redevelopment of abutting parcels actually increased dramatically during the project's

H-007-007

1 lengths of duration of this project from start to finish.

2 One other concern that I have is that the
3 E.I.S. Statement does not talk at all about how the project
4 will be financed. I have a bit of a concern that if a
5 project is started without the full clarification of where
6 the monies are coming from, that it is perhaps worse to
7 start the project and stop it midstream, than to do nothing
8 at all, because that would have a terrible impact on the
9 neighborhood.

10 I used to live in Albuquerque, and the major freeway
11 that's going to downtown Albuquerque was slated for
12 reconstruction which was begun and halted, and it's been
13 that way for over 10 years. And I have a concern that we
14 not do that kind of thing to our city in the construction
15 of this project. So, please carefully consider, when you
16 draft your final E.I.S. Statement, how to minimize the
17 amount of time that it will take to build this project or
18 also try to figure out the true costs associated with
19 dragging out the extent of this project and the throughway,
20 and all of the others things that will destroy the
21 neighborhood. Thank you very much.

22 SANDRA MISSNER: My name is Sandrah Missner, and I do
23 live on the waterfront. My concern is that I am in support
24 of the six-lane tunnel option, but I am opposed to the
25 temporary fly-over bypass that would direct interim traffic

16

construction in anticipation of indirect economic benefits that were reasonably expected to occur.

H-007-006

Many people asked the lead agencies to consider an alternative that would remove the viaduct and replace it with a four-lane surface roadway along Alaskan Way and include transit improvements. Without a host of improvements and modifications, a four-lane Alaskan Way would create even more congestion on I-5 and downtown streets than the alternatives evaluated in the Draft and Supplemental Draft EISs. Transportation studies performed for this project indicate that replacing the viaduct with a four-lane surface street would substantially increase congestion for most of the day and part of the evening on I-5 through downtown Seattle, downtown streets, and Alaskan Way. On downtown streets, traffic would increase by 30 percent, though traffic increases to specific areas like Pioneer Square and the waterfront could exceed 30 percent. With a four-lane roadway, traffic on Alaskan Way would quadruple to 35,000 to 56,000 vehicles per day compared to about 10,000 vehicles today. This traffic increase would make Alaskan Way the busiest street downtown, carrying more traffic than Mercer Street does today. The increased traffic congestion would also make travel times worse for buses, making transit improvements along these streets largely ineffective. Finally, neighborhoods west of I-5 (Ballard, Queen Anne, Magnolia, and West Seattle) would be less accessible and would face longer commute times.

H-007-007

An EIS intentionally does not evaluate funding or financial issues. This allows the documents to discuss and compare a broad range of environmental issues that are not easily quantified in terms of cost. The lead agencies are very concerned about project costs and have invested substantial effort into accurately evaluating the cost of each alternative.

A variety of financing mechanisms are under consideration and overall costs will continue to be an important part of the decision process.

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18 also try to figure out the true costs associated with
19 dragging out the extent of this project and the throughway,
20 and all of the others things that will destroy the
21 neighborhood. Thank you very much.

22 **H-008-001** SANDRA MISSNER: My name is Sandrah Missner, and I do
23 live on the waterfront. My concern is that I am in support
24 of the six-lane tunnel option, but I am opposed to the
25 temporary fly-over bypass that would direct interim traffic

16

H-008-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments and recognize your preference for the 2004 Cut-and-Cover Tunnel Alternative. After the 2004 Draft EIS was issued, numerous comments were received relating to the visual impacts and other negative effects of the Battery Street Flyover Detour. As the design plans for the Cut-and-Cover Tunnel and the Elevated Structure Alternatives evolved, the Battery Street Flyover Detour was eliminated.

H-008-001

1 along Alaskan Way. And the reasons for this is that it
2 would impact the commerce, the cruise line, all businesses
3 down there, and the residents.

H-008-002

4 I did not see anywhere in the Draft E.I.S. that for
5 existing residents there would be any compensation for the
6 years of construction, for the devaluation of our
7 properties, if, in fact, we should have to sell during that
8 time. So, I feel that there should be something written in
9 the final E.I.S. that would guarantee the property owners
10 that during construction period, if they should have to
11 sell their properties, that they are compensated
12 adequately.

H-008-003

13 Also, I did not see anywhere in the Draft E.I.S.
14 that mentioned final feasibility impact analysis, which
15 would state the pros and cons of all the impacts along the
16 waterfront. And I think many of them probably will be
17 mentioned by others, but for example, a staging area for
18 when they do construction, where that will be, because of
19 all of the parking, just all sorts of things that happen
20 down there.

21 And that's pretty quick and simple, but those are my
22 basic concerns. Thank you.

23 **BILL MACKAY:** I'm Bill Mackay. This, I think, is a
24 reasonably easy decision, in that there's great precedence
25 for making this decision. The hard things to do are ones

17

H-008-002

There are specific impacts that WSDOT can compensate for, such as excessive noise and vibration levels or damage to property. However, impacts that are not quantifiable are generally not compensable. If you experience impacts during construction, please call our 24-hour hotline, 1-800-AWV-LINE.

The Final EIS and its Appendix G, Land Use Discipline Report, contain updated information about properties that would be acquired for the project.

H-008-003

Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information. The Final EIS and Appendix B, Alternatives Description and Construction Methods Discipline Report, provide additional details about the alternatives, construction plans, and potential construction staging areas. Appendix C, Transportation Discipline Report, of the Final EIS also provides more detailed information on parking.

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23 **BILL MACKAY:** I'm Bill Mackay. This, I think, is a
24 reasonably easy decision, in that there's great precedence
25 for making this decision. The hard things to do are ones

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H-009-001

Many people asked the lead agencies to consider an alternative that would remove the viaduct and replace it with a four-lane surface roadway along Alaskan Way and include transit improvements. Without a host of improvements and modifications, a four-lane Alaskan Way would create even more congestion on I-5 and downtown streets than the alternatives evaluated in the Draft and Supplemental Draft EISs. Transportation studies performed for this project indicate that replacing the viaduct with a four-lane surface street would substantially increase congestion for most of the day and part of the evening on I-5 through downtown Seattle, downtown streets, and Alaskan Way. On downtown streets, traffic would increase by 30 percent, though traffic increases to specific areas like Pioneer Square and the waterfront could exceed 30 percent. With a four-lane roadway, traffic on Alaskan Way would quadruple to 35,000 to 56,000 vehicles per day compared to about 10,000 vehicles today. This traffic increase would make Alaskan Way the busiest street downtown, carrying more traffic than Mercer Street does today. The increased traffic congestion would also make travel times worse for buses, making transit improvements along these streets largely ineffective. Finally, neighborhoods west of I-5 (Ballard, Queen Anne, Magnolia, and West Seattle) would be less accessible and would face longer commute times.

Although the Embarcadero Freeway had some similarities to the Alaskan Way Viaduct, it served a different function. The Embarcadero Freeway was primarily a way for drivers to access the regional highway network from downtown San Francisco. After it was taken down, traffic from the Embarcadero Freeway shifted to more than a dozen parallel streets that served the same neighborhoods. Traffic on some city streets increased by as much as 50 percent following the closure of the Embarcadero Freeway.

H-009-001

1 where there is to precedence and you have to look at
2 confusing facts and decide, "How are we going to do this
3 decision?"

4 In this case, though, about 25 years ago, in the
5 City of San Francisco, they had two freeways the same
6 vintage as these, almost exactly analogous, and they had a
7 large earthquake. On the Oakland Bay side it was the
8 Admiral Nimitz freeway and, more pertinently, in
9 San Francisco there was the Embarcadero Freeway. Major
10 arterial flows.

11 The Oakland Bay Bridge funneled eight lanes of
12 traffic over the top of it, and dropped it into the
13 Embarcadero freeway and the interstate coming from the
14 south into San Francisco, and both of those funneled into
15 the Embarcadero freeway, which was the only way to get
16 around the city to the Golden Gate Bridge.

17 The earthquake wound up having the Embarcadero
18 freeway having to come down. Parts of it was fallen, and
19 the other part of it had to be removed. And there was,
20 like today, there was, "We can't live without it."
21 "There's too many cars that go across it." "We'll never
22 survive if we don't have something like it." There was a
23 lot of gnashing of teeth with politicians, but a lot of the
24 populous did not like the freeway, because it blocked their
25 view. Sounds familiar? And it had been built at a time

1 when there were huge warehouses down there and there wasn't
2 anything, and it was a very bad part of the city, still.

3 The decision, finally, either due to it was easy or
4 because they listened to the people, was that they decided
5 not to replace it entirely. It's never been replaced. And
6 everybody survived. All of the traffic still gets through
7 from both of those. They go through the middle of
8 downtown. Is it easy to do? No, and not terribly
9 convenient, but they do get through there. All the people
10 who want to get from "A" to "B" do. The area flourished in
11 that it became, for walking, what used to be underneath the
12 freeway is now a great walking boulevard, a great greenery,
13 and people love the area now. There's all sorts of very
14 high rent condominium and other restaurants and
15 establishments in the area. The politicians are viewed as
16 absolute heroes now, those who made the decision to not
17 replace it.

18 My point is, that that's as good of an analogy as
19 you'll ever see to the situation we face now. If you don't
20 succumb to the pressure of saying, "We have to do
21 something," "We don't have any money, so we'll do something
22 cheap and easy," even if you do nothing, all those who say
23 we can't possibly survive are wrong, you will survive. The
24 ideal thing that you have to do, because you only get a
25 chance like this every 70, 80 years or so, in order to do

1 something monumental, is get that out of there as a view
2 block.

3 If you really believe in tourism, and you really
4 think this has got to be a great city, and it is, but
5 that's one aspect of it that is an anachronism left from
6 the past. Bring it down, do not replace it, put the
7 freeway underground, that which you need, and turn that
8 into a boulevard, much like San Francisco had. If you do,
9 the politicians who make the decisions, you will also be
10 viewed as great saints and heroes. If you build another
11 one, that will be your legacy, and people will hate you for
12 years.

13 That's it. Thank you.

14 **DANIEL RAMRAS:** Okay. I'm Daniel Ramras. I
15 represent Triad Pier 70, LLC and numerous other Triad
16 properties on the Alaskan Way thoroughfare. We own and
17 occupy the Pier 70 property, which is at the foot of
18 Broad Street, we own property two blocks north of
19 Broad Street, and other property three blocks south of
20 Broad Street. We own a parking lot a block east of the
21 viaduct, on Seneca, and the Okay Hotel, which is directly
22 adjacent to the Alaskan Way Viaduct. Therefore, we have
23 substantial holdings and are going to be impacted
24 dramatically by the Alaskan Way Viaduct Seawall Project.

25 We are in favor of a tunnel option, a full tunnel

1 something monumental, is get that out of there as a view
2 block.

3 If you really believe in tourism, and you really
4 think this has got to be a great city, and it is, but
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20 Broad Street. We own a parking lot a block east of the
21 viaduct, on Seneca, and the Okay Hotel, which is directly
22 adjacent to the Alaskan Way Viaduct. Therefore, we have
23 substantial holdings and are going to be impacted
24 dramatically by the Alaskan Way Viaduct Seawall Project.

25 We are in favor of a tunnel option, a full tunnel

20

H-010-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

H-010-001

H-010-001
H-010-002

1 option. We are extremely concerned about traffic and,
2 therefore, would like to see the State and City work on a
3 plan that is the shortest construction plan possible, which
4 would entail closing down all unnecessary traffic roots
5 during the construction period. We are opposed to a
6 Broad Street overpass, and we are also opposed to a Seattle
7 Art Museum tunnel. Both of those options would create an
8 immense traffic problem, and visual problems for the owners
9 and tenants of Pier 70. The Broad Street overpass would
10 create a substantial visual impact which would almost
11 definitely create vacancies on Pier 70, and at a time when
12 occupancy is of key importance, obvious traffic impacts and
13 shading impacts.

H-010-003

14 The Seattle Art Museum underpass would also create
15 traffic problems directly at the front door of Pier 70, on
16 Alaskan Way. One of the largest problems that I have with
17 the presentation of alternatives over the last year is the
18 discrepancy between the items that have appeared on the
19 Draft Environmental Impact Statement and items that were
20 not discussed prior to issuance of a Draft Environmental
21 Impact Statement. Specifically, the Broad Street overpass
22 was not a topic of discussion and was brought up after the
23 comments, the closure of comments, in the Fall of 2003.
24 And the concept of the Seattle Art Museum underpass, the
25 tunnel, was verbally, at least, taken off the table, and

21

H-010-002

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

H-010-003

The Broad Street underpass (referred to as the Seattle Art Museum underpass in your comment) is no longer included in the project, and this change is reflected in the Final EIS.

The Broad Street detour (referred to as the Broad Street overpass in your comment), includes a temporary aerial trestle over the BNSF railroad tracks at Broad Street. This detour route is only proposed for the Elevated Structure Alternative. The Final EIS describes the visual effects and increased traffic flow along Broad Street and the north portion of the Alaskan Way surface street. We acknowledge your comment and concern about these effects; and we emphasize that these effects will be temporary and would not occur with the preferred alternative. Both the temporary trestle (overpass) and the traffic detour route will be removed

1 yet still appears on the Draft Environmental Impact
2 Statement.

3 We are, again, extremely opposed to the concept of
4 the Broad Street detour option, bringing all truck traffic
5 from I-99 Southbound down Broad Street, onto Alaskan Way.

6 Thank you.

7 **WILLIAM RAMIREZ:** (Through the Spanish Interpreter.)
8 Good afternoon. My name is William Ramirez. I come on
9 behalf of Casa Latina. I have one comment, and some
10 concerns. For my comment I have two points that I'd like
11 to make. Okay. So they've told us that they have a
12 project with Viaduct, that they want to move, because of
13 the Viaduct they want to move us to a different location.
14 Okay. So I would just like to mention that the place where
15 the Castle Latina now is located, and where the workers
16 congregate, is a place where we are together from early in
17 the morning until late in the evening.

18 For us, Casa Latina is the area that we congregate,
19 is very important, and it's very important for the Latino
20 community in Seattle, Washington. So, the reason that it
21 is so important for us is that we are working every day
22 from this place to be able to support our families. I
23 would like to ask, then, the City of Seattle and the
24 administrative personnel of the City, that they consider
25 this point: I would just like to ask that you consider

when they are no longer needed to accommodate traffic during project construction.

FHWA, WSDOT, and the City of Seattle considered other detour options in this area; however, the agencies have agreed that the Broad Street detour is the best solution based on trade-offs of cost, effects, and overall efficiency.

H-011-001

1 yet still appears on the Draft Environmental Impact
2 Statement.

3 We are, again, extremely opposed to the concept of
4 the Broad Street detour option, bringing all truck traffic
5 from I-99 Southbound down Broad Street, onto Alaskan Way.

6 Thank you.

7 WILLIAM RAMIREZ: (Through the Spanish Interpreter.)
8 Good afternoon. My name is William Ramirez. I come on
9 behalf of Casa Latina. I have one comment, and some
10 concerns. For my comment I have two points that I'd like
11 to make. Okay. So they've told us that they have a
12 project with Viaduct, that they want to move, because of
13 the Viaduct they want to move us to a different location.
14 Okay. So I would just like to mention that the place where
15 the Castle Latina now is located, and where the workers
16 congregate, is a place where we are together from early in
17 the morning until late in the evening.

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19 is very important, and it's very important for the Latino
20 community in Seattle, Washington. So, the reason that it
21 is so important for us is that we are working every day
22 from this place to be able to support our families. I
23 would like to ask, then, the City of Seattle and the
24 administrative personnel of the City, that they consider
25 this point: I would just like to ask that you consider

22

H-011-001

In March 2009, Casa Latina moved to their new building east of I-5 in the International District neighborhood. The new location is outside of the Alaskan Way Viaduct project area.

WSDOT will comply with the federal requirements for disadvantaged business enterprise (DBE) participation. WSDOT cannot require contractors to hire workers from specific organizations. However, WSDOT can and does encourage contractors to work with local organizations and to develop programs that draw on the local labor pool.

1 very seriously where we will go if we are moved and, as
2 Hispanics in this country, what will happen to us as part
3 of this project.

4 So, my first point is that, as Hispanics and as
5 members of Casa Latina, so that they, in the projects, that
6 will be as construction and other projects, as part of the
7 overall Viaduct project, that they give us priority and
8 that they provide some sort of jobs for us to be part of
9 the overall project. And so, it would be acceptable, any
10 kind of position, a general laborer, or whatever kind of
11 position that we could have with the project, because
12 Casa Latina has qualified workers. They've been trained to
13 do various different types of jobs.

14 The second point, and I'll conclude after this, we
15 understand and we respect why the City is going to move us
16 from this place. I'd like to mention again, knowing that
17 the City is going to move us, and that they are going to
18 help us to find a new location, we ask that it be in a
19 place that is very easy for people to get to, and very easy
20 for the people who need workers to come to and pick up the
21 different workers. We need easy access. So, we know that
22 the City could put us in a very spacious place anywhere,
23 that they could find some extra space, but it's very
24 important for us to be in a place that's close to the
25 center, and that it's easy for the people who need workers

1 to come and pick people up.

2 Okay. And that's it. Thank you very much.

3 FERMIN MONTANO: (Through the Spanish Interpreter.)

4 So, I agree that and I support that they have a new place
5 for Casa Latina. And this is for our families, and so that
6 we can support our families. And I would prefer that, if
7 possible, that it be that the jobs that they find are more
8 stable, longer lasting positions, rather than just a few
9 days. Maybe more like six months is better for the
10 Casa Latina workers, because the Casa Latina workers are
11 very good workers, and they're good workers, they've come
12 here to help the City of Seattle, and hope the opposite
13 happens as well, that the Seattle citizens help the
14 Casa Latina workers as well.

15 Another point, so, I would like that the support
16 that Casa Latina will get to be more formal and happen
17 sooner rather than later. So, I don't have much else to
18 say, but just that hopefully we can get help and that
19 everybody will do their part in order to make this happen.

20 I would also just like work. We'll all be more
21 secure, if we have jobs that last for longer than just
22 today. And because people are always going to be coming
23 back, day after day after day, as it is now. Okay.

24 LUIS FLORES: (Through the Spanish Interpreter.) My
25 name is Luis Flores, and I come on behalf of Casa Latina,

H-012-001

1 to come and pick people up.

2 Okay. And that's it. Thank you very much.

3 FERMIN MONTANO: (Through the Spanish Interpreter.)

4 So, I agree that and I support that they have a new place
5 for Casa Latina. And this is for our families, and so that
6 we can support our families. And I would prefer that, if
7 possible, that it be that the jobs that they find are more
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12 here to help the City of Seattle, and hope the opposite
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14 Casa Latina workers as well.

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22 today. And because people are always going to be coming
23 back, day after day after day, as it is now. Okay.

24 LUIS FLORES: (Through the Spanish Interpreter.) My
25 name is Luis Flores, and I come on behalf of Casa Latina,

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H-012-001

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22 today. And because people are always going to be coming
23 back, day after day after day, as it is now. Okay.

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25 name is Luis Flores, and I come on behalf of Casa Latina,

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H-013-001

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H-013-001

1 okay, but I also have my own opinion.
2 They told us that they were going to move
3 Casa Latina from where it is now, so I think, and also my
4 colleagues at Casa Latina think, that this is going to
5 greatly affect us. So, I come representing several other
6 colleagues as well, and we want to ask the City that they
7 help to us find another place that we can find work. So,
8 we would very much like it to be somewhere close to the
9 downtown, because most of us don't have any transportation
10 and we can't go to places that are far away on our own.
11 So, this way we will be able to continue work and go help
12 our families.
13 So, there's at least 1,000 to 1,500 new workers that
14 come every year to Casa Latina to work with Casa Latina.
15 So, we need this place very much, but also the people who
16 will come in the future need this place. So, the workers
17 at Casa Latina are helping the City of Seattle, and helping
18 to make it a prettier and nicer city. Okay. So we are
19 helping homeowners improve their homes, and help to save
20 them money by them using our labor.
21 And to the authorities and administrators that are
22 managing this project, one more time, please help us. And
23 we have faith in the authorities that they will help us.
24 DAN BANCHIU: My name is Dan Banchiu,
25 B-a-n-c-h-i-u. I'm a general manager at the Marriott Hotel

1 okay, but I also have my own opinion.
2 They told us that they were going to move
3 Casa Latina from where it is now, so I think, and also my
4 colleagues at Casa Latina think, that this is going to
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20 them money by them using our labor.

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22 managing this project, one more time, please help us. And
23 we have faith in the authorities that they will help us.

24 DAN BANCHIU: My name is Dan Banchiu,
25 B-a-n-c-h-i-u. I'm a general manager at the Marriott Hotel

H-014-001

We understand that members of the public may prefer different ways to share their comments. In order to encourage as much feedback as possible, we provided several options. At the hearings, attendees could submit comments on a written form, on a computer using an electronic form, or verbally to a court reporter. In addition to the meetings, the public could submit comments by mail or e-mail to the program team. The program team often holds open house-format public meetings to provide as much flexibility as possible to the public. With an open house format, hearing participants are able to come and go to the meetings as their schedules allow, making the meetings more convenient for many people.

H-014-001

H-014-001

1 on Alaskan Way, Seattle Waterfront.

2 First of all, I want to say that I was surprised and
3 quite disappointed there wasn't a formal hearing on this so
4 we all can hear each others points of view.

H-014-002

5 Additionally, I've been looking at some of the
6 documents, and I didn't think it adequately reflected the
7 true state of the business and the affect it would have on
8 those businesses. So, that concerned me quite a bit.

9 Additionally, we just invested \$90-million to
10 redevelop the waterfront, and I'm here to protect that. We
11 were led to believe for the last 10 years that the
12 waterfront was going to be redeveloped, and we joined in on
13 that whole thing, and now there's some, how do I say, some
14 renderings, that reflect the Viaduct will now be in front
15 of the hotel, and that will just strategically affect my
16 business to the detriment.

17 **MIKE HOWSHAR:** What I do want in the record is that
18 I'm a resident of Downtown Seattle, living on Alaskan Way,
19 so Alaskan Way is my home.

20 First, I object to the format of the hearing. I
21 thought it would be a public hearing, where we would hear
22 the comments of other folks, and I request that the State
23 provide some type of public format where we can all hear
24 the comments of others hearings or other concerned
25 individuals.

26

H-014-002

The preferred alternative does not propose to construct a temporary viaduct structure along the waterfront (or in front of the Marriott Hotel) as shown in the 2004 Draft EIS Aerial Alternative. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information.

Economic impacts are discussed in the Final EIS and Appendix L, Economics Discipline Report, of the Final EIS. Construction activities along the central waterfront would interfere with access to businesses and properties adjacent to the project on either side of the right-of-way. The project team has met numerous times with the businesses and property owners in the project area to discuss construction plans and solicit input on a variety of mitigation strategies. Chapter 8 of the Final EIS discusses mitigation measure in detail. We anticipate coordination with nearby businesses and property owners to continue through the rest of the design and construction process.

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26

H-015-001

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H-015-001

H-015-002

1 Regarding the Draft E.I.S., as a resident who lives
2 on Alaskan Way, I'm concerned that the document does not
3 adequately discuss the impact to my home on Alaskan Way,
4 given the increased possibility of increased traffic,
5 potential public hazard with that increased traffic, and
6 does not adequately address the concerns of the increase of
7 pollution from the vehicles traveling through there, as
8 well as the sound and noise pollution from the additional
9 vehicles.

H-015-003

10 I'm also concerned that the inadequacies of this
11 Draft E.I.S., as a public document, does not provide a
12 strong foundation upon which the public can comment on the
13 potential options for the viaduct. That's all.

14 BOB MESSINA: All right. My name is Bob Messina,
15 M-e-s-s-i-n-a. I live at 1301 North 90th Street. I come
16 down to Alaskan Way for recreation via Myrtle Edwards Park,
17 and I often walk the waterfront all the way to King Street
18 Station.

19 After seeing the various options for replacing the
20 Viaduct, my concern is to keep as much traffic off of
21 Alaskan Way in the future as possible. Therefore, from all
22 of these alternatives, the plan that keeps the most traffic
23 off of Alaskan Way is the full tunnel option. And
24 therefore, I support the full tunnel option. Even though
25 it's listed as the most expensive, it is not terribly much

27

H-015-002

As a neighbor adjacent to the existing viaduct and project construction area, your concerns are acknowledged. The project will continue to coordinate with the residents and businesses along Alaskan Way through open houses, newsletter updates, and e-mail. Mitigation measures addressing noise, parking, traffic, dust, and other factors of specific interest to residences and businesses are included in Chapter 8 of the Final EIS.

H-015-003

Since comments were received in 2004, the project has evolved. The lead agencies believe the information provided in the 2004 Draft EIS, 2006 and 2010 Supplemental Draft EISs, and the Final EIS do give the public a solid foundation of information to compare the alternatives and provide comments. In addition to information provided in the main body of the EIS documents, discipline reports containing additional detail and analysis are included on a CD attached to the back of each document and are located on WSDOT's website.

1 Regarding the Draft E.I.S., as a resident who lives
2 on Alaskan Way, I'm concerned that the document does not
3 adequately discuss the impact to my home on Alaskan Way,
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24 therefore, I support the full tunnel option. Even though
25 it's listed as the most expensive, it is not terribly much

H-016-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

H-016-001

1 higher than the other options. So, I wholeheartedly
2 support the tunnel option because it, first of all, keeps
3 more traffic off of Alaskan Way and, secondly, it opens up
4 all of the green spaces and park blocks for pedestrians,
5 and the bicycle lanes, and much wider sidewalks. So, that
6 plan I'm recommending, as one voter tonight.

7 **ERIN HOWSHAR:** My name is Erin Howshar. I am a
8 resident on Alaskan Way, and I've lived there for
9 approximately four years.

10 I'm concerned about the Draft Environmental Impact
11 Study because I don't feel that it adequately addresses a
12 lot of issues that should be addressed for Downtown
13 residents. One, I don't feel it adequately addresses the
14 alternatives in a comprehensive manner. It only addresses
15 five alternatives, and does not address at all, routing
16 traffic other ways through the city and through the
17 downtown area. It does not focus on minimizing impact to
18 Downtown residents, and especially along the waterfront. I
19 don't feel that it adequately addresses the economic impact
20 that is going to be had to Downtown residents and business
21 owners along the waterfront, especially with regard to the
22 plan to build a temporary viaduct along Alaskan Way and in
23 front of many of the businesses and residences that are
24 downtown.

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5 and the bicycle lanes, and much wider sidewalks. So, that
6 plan I'm recommending, as one voter tonight.

7 ERIN HOWSHAR: My name is Erin Howshar. I am a
8 resident on Alaskan Way, and I've lived there for
9 approximately four years.

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11 Study because I don't feel that it adequately addresses a
12 lot of issues that should be addressed for Downtown
13 residents. One, I don't feel it adequately addresses the
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20 that is going to be had to Downtown residents and business
21 owners along the waterfront, especially with regard to the
22 plan to build a temporary viaduct along Alaskan Way and in
23 front of many of the businesses and residences that are
24 downtown.

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28

H-017-001

Further analysis of alternatives was completed for the 2006 and 2010 Supplemental Draft EISs, and this Final EIS. The alternatives are described in Chapter 3 of the Final EIS. The Battery Street Flyover Detour shown in the 2004 Draft EIS has been eliminated.

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. No residential displacements are expected with the preferred alternative. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

H-017-002

There are specific impacts that WSDOT can compensate for, such as excessive noise and vibration levels or damage to property. However, impacts that are not quantifiable are generally not compensable. If you experience impacts during construction, please call our 24-hour hotline, 1-800-AWV-LINE.

H-017-001

H-017-002

H-017-002

1 adequately addresses how to compensate for disruption of
2 residential privacy, and I don't feel that the
3 Environmental Impact Study adequately addresses improving
4 the current infrastructure through the downtown area.

H-017-003

H-017-004

5 I was also disappointed that the hearing today was
6 not a public hearing, that residents did not get a chance
7 to hear what everyone else was saying, and to be heard by
8 their fellow Downtown residents.

H-017-005

9 I also don't think the Environmental Impact Study
10 adequately addressed public safety, during the construction
11 project and after. Thank you.

12 ROBIN ATLAS: I just wanted to say that this is
13 probably the biggest project that this city has undertaken
14 in decades, and the City's only got one chance to really
15 make it right. And I think that, in my opinion, as someone
16 who lives on the waterfront, I'd like to see the waterfront
17 and the downtown area reconnected, with lots of open, green
18 space. And I think in order to accomplish that the best
19 alternative is the tunnel. It doesn't seem to me that in
20 terms of time and inconvenience, if it takes, you know, one
21 year or six months, here or there, it doesn't seem to make
22 a lot of difference, and I'd like the City to really think
23 very carefully about what impact this is going to have to
24 all of us that live in the waterfront area and play in the
25 waterfront area, and spend your dollars wisely. That's

29

H-017-003

Fixing the larger transportation infrastructure through the downtown area is beyond the scope of this project. Please see Chapter 3 in the Final EIS for a description of each alternative in the project area.

H-017-004

We understand that members of the public may prefer different ways to share their comments. In order to encourage as much feedback as possible, we provided several options. At the hearings, attendees could submit comments on a written form, on a computer using an electronic form, or verbally to a court reporter. In addition to the meetings, the public could submit comments by mail or e-mail to the program team. The program team often holds open house-format public meetings to provide as much flexibility as possible to the public. With an open house format, hearing participants are able to come and go to the meetings as their schedules allow, making the meetings more convenient for many people.

H-017-005

Updated information on public services (including police, fire, etc.) is provided in the Final EIS. In addition, the content and level of analysis conducted for the document is consistent with the level of design to inform the public and decision-makers of the probable consequences resulting from the project or from inaction.

1 adequately addresses how to compensate for disruption of
2 residential privacy, and I don't feel that the
3 Environmental Impact Study adequately addresses improving
4 the current infrastructure through the downtown area.

5 I was also disappointed that the hearing today was
6 not a public hearing, that residents did not get a chance
7 to hear what everyone else was saying, and to be heard by
8 their fellow Downtown residents.

9 I also don't think the Environmental Impact Study
10 adequately addressed public safety, during the construction
11 project and after. Thank you.

12 **ROBIN ATLAS:** I just wanted to say that this is
13 probably the biggest project that this city has undertaken
14 in decades, and the City's only got one chance to really
15 make it right. And I think that, in my opinion, as someone
16 who lives on the waterfront, I'd like to see the waterfront
17 and the downtown area reconnected, with lots of open, green
18 space. And I think in order to accomplish that the best
19 alternative is the tunnel. It doesn't seem to me that in
20 terms of time and inconvenience, if it takes, you know, one
21 year or six months, here or there, it doesn't seem to make
22 a lot of difference, and I'd like the City to really think
23 very carefully about what impact this is going to have to
24 all of us that live in the waterfront area and play in the
25 waterfront area, and spend your dollars wisely. That's

H-018-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

H-018-002

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. After the 2004 Draft EIS was published, your comments along with others led to additional planning, analysis, and the revised alternatives presented in the 2006 Supplemental Draft EIS. Following publication of the 2006 Supplemental Draft EIS, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2004 Draft and 2006 Supplemental Draft

H-018-002

1 it.

2 As far as the impact on the quality of life for the
3 people who live on the waterfront, we're going to be
4 decimated in terms of our quality of life if you decide to
5 build the fly-over, when you do the aerial, you know,
6 replacement of the aerial proposal, I suppose. We'll be
7 affected by the construction of the fly-over, we'll be
8 affected by the noise that's generated by all the cars that
9 are whizzing by in front of our windows, essentially, and
10 we'll be affected adversely by all of the pollution that's
11 going to be produced by all of the cars whizzing by our
12 windows, and I just don't think that that's a very viable
13 idea.

H-018-003

14 One of the things that I'd like to see is you just
15 knock the darned thing down and do an experiment for a year
16 and see how people maneuver and how they get into the city,
17 and see if doing nothing is actually a good alternative.
18 If the City steps up and they build Park and Ride, and they
19 help people with alternatives, and encourage them to leave
20 their cars at home, better yet for all of us.

21 So, there's a lot for you all to consider, and in
22 the end, I'd like to see a tunnel get built down on the
23 waterfront. Thank you.

24 SUZAN NETTLESHIP: My name is Suzan Nettleship, and
25 I've been a resident on the waterfront for approximately —

30

EISs, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to identify the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront.

H-018-003

Many people asked the lead agencies to consider an alternative that would remove the viaduct and replace it with a four-lane surface roadway along Alaskan Way and include transit improvements. Without a host of improvements and modifications, a four-lane Alaskan Way would create even more congestion on I-5 and downtown streets than the alternatives evaluated in the 2004 Draft EIS and 2006 and 2010 Supplemental Draft EISs. Transportation studies performed for this project indicate that replacing the viaduct with a four-lane surface street would substantially increase congestion for most of the day and part of the evening on I-5 through downtown Seattle, downtown streets, and Alaskan Way. On downtown streets, traffic would increase by 30 percent, though traffic increases to specific areas like Pioneer Square and the waterfront could exceed 30 percent. With a four-lane roadway, traffic on Alaskan Way would quadruple to 35,000 to 56,000 vehicles per day compared to about 10,000 vehicles today. This traffic increase would make Alaskan Way the busiest street downtown, carrying more traffic than Mercer Street does today. The increased traffic congestion would also make travel times worse for buses, making transit improvements along these streets largely ineffective. Finally, neighborhoods west of I-5 (Ballard, Queen Anne, Magnolia, and West Seattle) would be less accessible and would face longer commute times.

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3 people who live on the waterfront, we're going to be
4 decimated in terms of our quality of life if you decide to
5 build the fly-over, when you do the aerial, you know,
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18 If the City steps up and they build Park and Ride, and they
19 help people with alternatives, and encourage them to leave
20 their cars at home, better yet for all of us.

21 So, there's a lot for you all to consider, and in
22 the end, I'd like to see a tunnel get built down on the
23 waterfront. Thank you.

H-019-001

24 SUZAN NETTLESHIP: My name is Suzan Nettleship, and
25 I've been a resident on the waterfront for approximately —

30

H-019-001

We understand that members of the public may prefer different ways to share their comments. In order to encourage as much feedback as possible, we provided several options. At the hearings, attendees could submit comments on a written form, on a computer using an electronic form, or verbally to a court reporter. In addition to the meetings, the public could submit comments by mail or e-mail to the program team. The program team often holds open house-format public meetings to provide as much flexibility as possible to the public. With an open house format, hearing participants are able to come and go to the meetings as their schedules allow, making the meetings more convenient for many people.

H-019-001

1 well, almost four years.

2 Let me begin by saying that this public hearing and
3 open house is actually quite inadequate for ascertaining
4 what are the public views and the sharing of view points
5 from different constituencies. I would encourage and say
6 that Washington D.O.T. should indeed have true public
7 hearings, where the opinions of the various constituencies
8 are heard and commented upon. Because, without that very
9 vital element, there is no real coalition building and
10 understanding of the project.

H-019-002

11 The information presented is interesting, but let's
12 also address the deficiencies of what is presented here
13 today, as well as the issues that are included in the
14 Draft Environmental Impact Statement.

15 First of all, the plans that are submitted within
16 the Draft E.I.S., I have been advised, do not truly reflect
17 what is in the current planning stage and, therefore, are
18 presenting false information.

H-019-003

19 As to the areas that have been covered in the
20 Draft E.I.S., there are several areas of deficiency. In
21 particular, I believe there has been insufficient review
22 and planning devoted to the economic impacts on the
23 existing businesses, residences, and use of the waterfront
24 during the construction period. This is a particular
25 concern in that it is not a temporary circumstance when a

H-019-002

The 2004 Draft EIS accurately described the alternatives and options under consideration at the time it was written. The lead agencies published two Supplemental Draft EISs (in 2006 and 2010) that provided updated information on the proposed alternatives and construction plans. Each supplemental draft included a formal public comment period, during which several public hearings were held. The Final EIS provides the latest information on the proposed alternatives.

H-019-003

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

H-019-003

1 construction period can last as long as eleven years. For
2 a number of constituencies that could be effectively a
3 lifetime in the cycle of a business or someone's residency
4 on the waterfront.

H-019-004

5 Additionally, I don't believe that the E.I.S. has
6 adequately addressed alternatives to both options dealing
7 with transportation during the construction period, which
8 might ultimately impact the total construction, and have a
9 positive affect in reducing the amount of time required for
10 construction.

H-019-005

11 There has been insufficient time devoted to looking
12 at the alternatives in terms of traffic flow, traffic flow
13 means and methods, which includes both commuter traffic,
14 destination traffic, truck delivery, as well as through
15 trucking and commerce related transportation. Insufficient

H-019-006

16 analysis has been done as to how to mitigate or compensate
17 for the economic impacts to the various parties affected by
18 construction, in terms of reduced revenue to retailers,
19 reduced revenue to the cruise ships, the economic impact on
20 land values, and what can be done for mitigation during the
21 construction period to the various constituencies.

H-019-007

22 Additionally, there has not been enough study or
23 analysis given to the displacement of existing parking,
24 both for residents, office itinerant, and mass
25 transportation, wheeled vehicles, such as busses and

32

H-019-004

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

H-019-005

Additional traffic analysis for each proposed build alternativewas presented in the 2006 and 2010 Supplemental Draft EISs and the Final EIS. In addition, each EIS includes a Transportation Discipline Report (Appendix C) that contains a substantial amount of information about traffic impacts and travel times.

H-019-006

Please see the Final EIS and Appendix L, Economics Discipline Report, of the Final EIS for current information on the economic impacts and proposed mitigation for the project. The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation

H-019-007

1 taxi. It seems as though little planning or analysis has
2 been put into planning and how there can be a coordination
3 of the need for this traffic with existing mass transit or
4 the funding of alternative of mass transit.

H-019-008

5 Ultimately, whatever alternative design is put into
6 effect, the current land owners, inhabitants and users of
7 the waterfront should not suffer the economic brunt during
8 the construction period.

9 SANDRA POLLOCK: Well, I just wanted to say that I am
10 opposed to the fly-by alternative they have for traffic
11 flow. It seems like just a waste of taxpayer dollars.

12 I am definitely for a tunnel to go through, but
13 there should be a different way, an alternate route for
14 traffic. I've wondered why we couldn't make Alaskan Way
15 one way south, and maybe Third Avenue or another route, one
16 way north and one south, and then connect in together. It
17 seems like a common-sense way to do it.

18 I think the Viaduct is unsafe and an alternative
19 needs to be taken care of sooner, rather than later.

20 Well, I think environmentally the fly-by situation
21 is not good for tourism, for anything on the waterfront.
22 When I go down there I like to — it's noisy enough as it
23 is, and then that would just impact it even more.

24 I can't think of anything else I want to say. I
25 think that just says it in a nutshell.

33

measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

H-019-007

The 2004 Draft EIS, 2006 and 2010 Supplemental Draft EISs, Final EIS, and Transportation Discipline Reports provide detailed information about parking removals and effects. FHWA, WSDOT, and the City of Seattle are working with transit providers to determine transit routes and options during project construction. Mitigation measures are discussed in Chapter 8 of the Final EIS.

H-019-008

Construction will be challenging for many businesses and people. Possible mitigation measures are discussed in Chapter 8 of the Final EIS.

1 taxis. It seems as though little planning or analysis has
2 been put into planning and how there can be a coordination
3 of the need for this traffic with existing mass transit or
4 the funding of alternative of mass transit.

5 Ultimately, whatever alternative design is put into
6 effect, the current land owners, inhabitants and users of
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H-020-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

H-020-002

After the 2004 Draft EIS was issued, numerous comments were received relating to the visual impacts and other negative effects of the Battery Street Flyover Detour. As the design plans for the Cut-and-Cover Tunnel and the Elevated Structure Alternatives evolved, the Battery Street Flyover Detour was eliminated.

H-020-001

H-020-002

H-021-001

1 MAS KOBA: Well, my name is Mas Koba, spelled M-a-s,
2 and then the last name, K-o-b-a. And as far as my
3 residential address, 1726 - 15th Avenue, and that's
4 Seattle, 98122, in Seattle.

5 And as far as this viaduct and this seawall they're
6 constructing, that's costing something about
7 \$2-and-a-half-billion dollars to, I'd say, over about
8 almost \$1-billion dollars, it seems like it's a lot of
9 money there, but I'd say one of the things that they can't
10 or they probably could think about is to try to extend the
11 viaduct going north, all the way to the Interbay, and then
12 over to North Magnolia, along the canal there, and then
13 into the Discovery Park, and then from there, from
14 West Point, be able to connect, have a cross Sound
15 connection over to Bainbridge Island, and over to the
16 peninsula. And then, you can charge toll on the thing.

17 And then the other route would be going south, going
18 on the existing road there, going over to West Seattle, and
19 possibly if they want to go all the way down to Fontelroy,
20 be able to go from the Fontelroy Ferry and to go across,
21 have a cross Sound connection over to Vashon Islands, and
22 then over the to the peninsula. Or, if they don't want to
23 go down to Fontelroy, the other way would be go over to
24 West Point, or I should say Alkai Point, and have a cross
25 Sound bridge starting from there over to the Vashon, and

34

H-021-001

Thank you for your comments. The purpose and need for this project is to replace SR 99 along the Seattle waterfront. The recommendations that you have provided are beyond the scope of this project.

1 then over to the peninsula.

2 And I'd say this should be there because, well, one
3 thing is to replace that ferry system that the State is
4 running, because that ferry system is a money loser. The
5 people of the state are subsidizing that thing, and I think
6 that it's about time. This is the 21st Century age, and we
7 can't do something there that's -- or start way back in the
8 19th Century and using 19th Century ideas, but go into the
9 21st Century age. That's something we can be able to think
10 about.

11 We can make this a toll, the whole thing, starting
12 from the Vashon Islands and going into Seattle downtown
13 area, over to West Point and over, and make that entire
14 route a toll road. And I'd say a toll road and a toll
15 bridge, because I think a toll system will work a lot
16 better, if they were all connected, all the bridges and the
17 Alaskan Way Viaduct.

18 And from the past history, this is something that's
19 not new, it's been started with this idea that was thought
20 about way back in, I'd say, the early 40's, and they were
21 planning to do something like this, you know. The idea
22 about having a cross Sound bridge, the idea was favored by
23 even one of the governors who was a Republican governor, by
24 the name of Arthur Langley. But, he was all in favor of
25 doing something like this, because at that time the ferry

1 system was privately owned and they were trying to build
2 the money or, I should say — yeah, they were trying to
3 vote the people out of raising the fair every damned time,
4 and it was getting very expensive for people to be paying
5 this amount of money, so the State went and stepped in and
6 they said — and they were trying to control it, as far as
7 the pay increase on the toll, I should say on the — you
8 know, yeah, they were trying to increase the fair on the
9 ferry. But, so, when the State came out with this idea,
10 well, we're going to put in a bridge and that would just —
11 and they told them, "Well, you guys are not going to be in
12 business after we put the bridge in," which was sort of a
13 black mailing somewhat. And so they said, "Well, the thing
14 you can do is just sell the ferry system to us, and then
15 we'll build this bridge, and then the ferries, we won't
16 have the use of the ferries no more."

17 Well, the thing is, the State went and bought out
18 the ferry system, but they never ever built the dog gone
19 bridges, so for the last 50 years it's been sort of a
20 concept and an idea that many people like myself still do
21 remember that. And I say now is the time that we should
22 start thinking about doing something like this, rather than
23 having a ferry system which is doing nothing but just
24 costing us money every damned time that we have our eyes on
25 the damned thing. That just doesn't seem to make any

1 sense, to go out and subsidize it. So, if they say, "Well,
2 as far as how much it would cost to put up a system like
3 this," well, who knows? It may cost maybe about
4 \$100-billion. Well, you know, when they built the first
5 Lake Washington bridge, they said that the cost would be
6 over \$10-million or something. And people were saying were
7 squabbling back then, they were squawking the darned thing
8 was expensive, it would never ever work, you know, and they
9 were trying to fight it from going in. But I think they
10 were fighting for something like about 5 years or 10 years,
11 or whatever it was, but they finally went and built that
12 thing, and after they built that thing, that thing made
13 money. They were expecting the thing would be paid for
14 within about 20 years. They've had that thing paid off in
15 about 5 years.

16 And, when they put in the Tacoma Narrows Bridge, the
17 first one, when it went down, it was about the same time
18 that they opened up the Lake Washington Bridge, the first
19 one. Well, when they built the second one there, which is
20 back in 1950, they built it more sturdier, and it cost
21 about twice as much as the first one that they built up,
22 and that thing got paid off in something like 14 years or
23 so. And the same thing happened to the Evergreen Bridge.
24 That was on — they were all paid off by tolls. Whoever
25 uses that thing, you know, it was — it's a — you know,

1 users pay. That works. So, it didn't cost anybody
2 anything else, except the dog gone people who were using
3 the thing. So, it makes sense to do something like that.

4 If they can, you know, build the cross Sound bridge,
5 the two cross Sound bridges, and then have this, you know,
6 Alaskan Way Viaduct included with it, and make that entire
7 route a toll road or toll bridge. But, I think just, you
8 know, if either one of them would just had stand alone on
9 the thing, I don't think it would work because, you know,
10 you got to have a connection of some kind in order for
11 these, you know, the three places to — two cross Sound
12 bridges, and that connecting of Alaskan Way Viaduct.

13 Anyway, that's what I got to say on that.

14 **BRUCE FINE:** My name is Bruce Fine, and I live on
15 the waterfront. I'm concerned that they have not addressed
16 adequately the notion of having traffic be either
17 eliminated, or substantially impeded, during the
18 construction period. It appears that there's a presumption
19 that traffic needs to continue to flow through this area
20 while construction is going on, as a result of which there
21 are a number of mitigation, temporary measures, and so
22 forth, which extend the construction time and substantially
23 divert resources from the actual project to these temporary
24 mitigation issues.

25 I would like it see them consider a couple of

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22 forth, which extend the construction time and substantially
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38

H-022-001

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

H-022-002

Some projects in the area, such as the section of Mercer Street between Dexter Avenue and I-5 are currently under construction. The Final EIS discusses other projects under construction at the same time as the viaduct replacement in Chapter 6. The project team is endeavoring to reduce the construction impacts on all affected neighborhoods.

H-022-001

H-022-002

H-022-002

1 things. First, there are a number of projects that seem to
2 be sort of ancillary to the main waterfront project, that
3 being Mercer Street and Broad Street, and making sure that
4 those projects get done first, as a means of dealing with
5 additional traffic flow that happened as a result of
6 construction, and then explore other areas or other ways to
7 deal with the increased traffic during construction, other
8 than having it continue to go through that corridor or have
9 built-in measures.

10 The idea of that is that you constrict the
11 construction time to as small a period of time as possible,
12 and you hopefully make an effort to spread the impact of
13 the construction through a number of neighborhoods and not
14 just the waterfront neighborhood. By minimizing the
15 construction period you save resources and you obviously
16 save the impact of the construction on the waterfront
17 residents, the merchants, and tourists, and all the rest of
18 that.

H-022-003

19 I have just found out, out in the other room there,
20 that the State of the ferry system has a project for the
21 Coleman Dock that contemplates redoing that, and perhaps
22 redirecting the traffic flow off of the ferry, and I think
23 that they need to address the timing and impact issue as to
24 how that's going to affect what is going on and whether or
25 not some collaboration, some input from this project and

H-022-003

Washington State Ferries (WSF) is part of the State Department of Transportation. The lead agencies have coordinated with WSF from the onset of this project regarding the ferry access and egress operations during and after construction. For the preferred alternative, a temporary northbound lane would be added during construction to accommodate ferry traffic.

Cumulative construction impacts have been analyzed in Chapter 6 of the Final EIS.

H-022-003

1 that project, so that it gets done first and, again,
2 minimize the impact of the construction on the waterfront
3 community.

H-022-004

4 There is sort of a corollary to that, and they call
5 it the no action alternative. And I don't know that
6 they've -- I don't feel that they have spent enough time
7 dealing with the impact of that and, actually, the no
8 action alternative is sort of akin to what would we do if
9 there was no traffic flow through this corridor during
10 construction. So, assessing that alternative accomplishes
11 two things. One, can you divert the traffic sufficiently
12 so that perhaps this project doesn't need to be done at all
13 or near the scale that is proposed? Or alternatively, how
14 do you, as I said before, minimize the time for
15 construction and spread the impact of the construction
16 problem through as many neighborhoods as possible?

H-022-005

17 I also think that there is a deficiency in the
18 consideration of the impact of this construction on the
19 waterfront community that you read things in there about
20 noise and shading and so forth and so on, but there is
21 vibration to the ground, there is pollution, there's
22 particulate matter from both the construction mess and from
23 diverting traffic, and a whole host of other impacts that I
24 don't think have been adequately addressed.

25 Who is the prototype person that they use when

40

H-022-004

Many people asked the lead agencies to consider an alternative that would remove the viaduct and replace it with a four-lane surface roadway along Alaskan Way and include transit improvements. Without a host of improvements and modifications, a four-lane Alaskan Way would create even more congestion on I-5 and downtown streets than the alternatives evaluated in the Draft and Supplemental Draft EISs. Transportation studies performed for this project indicate that replacing the viaduct with a four-lane surface street would substantially increase congestion for most of the day and part of the evening on I-5 through downtown Seattle, downtown streets, and Alaskan Way. On downtown streets, traffic would increase by 30 percent; though traffic increases to specific areas like Pioneer Square and the waterfront could exceed 30 percent. With a four-lane roadway, traffic on Alaskan Way would quadruple to 35,000 to 56,000 vehicles per day compared to about 10,000 vehicles today. This traffic increase would make Alaskan Way the busiest street downtown, carrying more traffic than Mercer Street does today. The increased traffic congestion would also make travel times worse for buses, making transit improvements along these streets largely ineffective. Finally, neighborhoods west of I-5 (Ballard, Queen Anne, Magnolia, and West Seattle) would be less accessible and would face longer commute times.

H-022-005

More detailed information about construction effects and mitigation has been provided in the 2006 and 2010 Supplemental Draft EISs and the Final EIS. Additional details about mitigation can be found in Chapter 8 of the Final EIS. The 2004 Draft, 2006 and 2010 Supplemental Draft, and Final EISs all considered effects to people, surrounding neighborhoods, and the natural environment (including known species in the project area). Effects were not evaluated using a "prototype person," rather, effects to the general population are discussed.

H-022-005

1 they're trying to assess these impacts? Do they assess
2 them against people that are young and healthy, or old and
3 infirm, or children, pets. You know, the variety of living
4 creatures on the waterfront of varying ages and types, I
5 don't think have been adequately evaluated for the effects
6 that this construction would have on them. And so, I would
7 like to see the E.I.S. spend more time on that.

8 And once again, my thinking is that you minimize the
9 construction period as much as possible, and so, whatever
10 the affects are on those variety of individuals, those
11 become minimized to the extent possible and, then again,
12 spread it around to other communities. I think that's all
13 I have to. Say. Thank you very much.

14 SCOTT KRAFT: I do not believe that the E.I.S. does
15 not adequately address negative affects on the residents of
16 the waterfront during the construction, or consider options
17 to reduce these negative affects. Specifically, the E.I.S.
18 does not adequately address the option of the shortest
19 construction periods. All the alternatives seem to be
20 based on maintaining the current traffic flow during the
21 construction and, thus, leading to longer construction
22 periods and costs, reduced construction costs created by
23 shorter construction periods and minimizing traffic detours
24 during construction, and economic impacts during
25 construction on the waterfront related to reduced property

Thank you for stating your preference to minimize the construction duration as much as possible. Construction durations are discussed in Chapter 6 of the Final EIS.

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2 them against people that are young and healthy, or old and
3 infirm, or children, pets. You know, the variety of living
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H-023-001

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

H-023-001

H-023-001

H-023-002

H-023-003

1 values, lost business, lost tax revenues and reduced
2 revenues from cruise ship patrons. The E.I.S. does not
3 adequately address pedestrian traffic during and after the
4 construction, specifically for pedestrians getting to and
5 from the Pike Place Market and the waterfront. All the
6 alternatives don't consider extending the tunnel for the
7 trains further north, which would improve the traffic flow
8 on the northern part of Alaskan Way.

9 **JONATHAN DAVID:** I think that the three comments that
10 I want to make about the Draft E.I.S. are: No. 1, is that
11 I'm concerned that it doesn't mention anything about
12 business impacts or how we're going to maintain the
13 businesses that are alive and well in the water front right
14 now throughout construction, and what we're going to do
15 there. No. 2, it says nothing about property values for
16 people that live on the waterfront, which I do, and I care
17 a whole lot about that. And No. 3, there's no specific
18 mention of the option where we build something to replace
19 the Viaduct but in the meantime don't do a lot of work to
20 reroute traffic, we kind of accept the fact that traffic
21 might need to reroute itself, and we get the job done as
22 fast as we can by just focusing on the final product. That
23 is all. Thank you.

24 **MAX FOSTER:** My name is Max Foster. I live at 2549 -
25 34th Avenue West, in Seattle, which is the Magnolia

42

H-023-002

Pedestrian access and safety on the waterfront will be maintained at all times during construction activities. At times, it will be necessary to reroute pedestrians using temporary facilities and detours, but these detours will be designed to minimize any inconvenience and would be ADA compliant. Any sidewalk, path, or the pedestrian bridge to Colman Dock that may be removed to accommodate construction activities will be replaced with a temporary facility in a nearby location with equal capacity. Wayfinding signs will also be placed to help pedestrians access the waterfront, Pike Place Market, and other sites in the corridor.

Further information on how the Project will address pedestrian access and safety during construction activities can be found in Appendix C, Transportation Discipline Report, of the Final EIS.

H-023-003

The BNSF Railway has not expressed interest in altering its tunnel as part of the project.

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2 revenues from cruise ship patrons. The E.I.S. does not
3 adequately address pedestrian traffic during and after the
4 construction, specifically for pedestrians getting to and
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H-024-001

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H-024-002

H-024-003

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25 34th Avenue West, in Seattle, which is the Magnolia

42

H-024-001

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

H-024-002

Please refer to the Economics Discipline report, where you will find discussion related to the potential economic effects of the project. WSDOT cannot speculate as to how the various factors that influence property values will come together at some future time.

H-024-003

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each

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20 reroute traffic, we kind of accept the fact that traffic
21 might need to reroute itself, and we get the job done as
22 fast as we can by just focusing on the final product. That
23 is all. Thank you.

24 **MAX FOSTER:** My name is Max Foster. I live at 2549 -
25 34th Avenue West, in Seattle, which is the Magnolia

42

H-025-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. After the 2004 Draft EIS was published, your comments along with others led to additional planning, analysis, and the revised alternatives presented in the 2006 Supplemental Draft EIS. Following publication of the 2006 Supplemental Draft EIS, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2004 Draft and 2006 Supplemental Draft EISs, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to identify the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront.

H-025-001

1 neighborhood. I've lived in Seattle since 1988. Before
2 that, I lived in Alaska.

3 I love Seattle, and even when I lived in Alaska, I
4 always enjoyed visiting Seattle. One of my favorite areas
5 to visit was the waterfront. I fell in love with it before
6 I ever moved here. Since I moved here I've enjoyed,
7 immensely, living in Magnolia. My business is located in
8 Magnolia, however, we have customers all over Puget Sound.
9 Many of our customers are in West Seattle and Renton, and
10 for our business we frequently visit those customers, we
11 use the Viaduct, we consider Highway 99 a vital
12 transportation link for us. I-5 is not a good substitute
13 for that, so we consider whatever it takes to make
14 Highway 99 a viable transportation artery, and to continue
15 to be that, is an important priority for government and for
16 citizens of Seattle King County and Washington State.

17 I will say my background has been working in
18 utilities and transportation, and I currently own a
19 computer services company. When I worked in utilities I
20 did feasibility studies for two hydroelectric projects that
21 were built in Alaska. One was tie Tyee Lake, and the other
22 one was Terror Lake. I also worked on a hydroelectric
23 project that was not built, called the Susitna Project.
24 Having been through that experience, I know the great
25 benefits from the projects that were built, and I know the

1 opportunity that was missed by the project that was not
2 built.

3 As a citizen of Seattle, I believe that taking the
4 same road of not building the correct transportation artery
5 for the viaduct replacement will have the same impact as
6 not building the Susitna hydro project. It will be a great
7 opportunity lost for the citizenry of Seattle, as well as
8 Washington State.

9 I also, when I moved to Seattle, worked on the.

10 Metro Tunnel project and the West Point Treatment
11 Plant project, secondary treatment project, doing cash
12 management when employed at Metro. I know about building
13 large projects, and I know what it takes in terms of the
14 financing and the resources to do those projects. It seems
15 to me that I'd like to make four points in my testimony
16 here on that. One is, many people are saying right now
17 that we don't have the money to spend or we don't want to
18 spend this money on doing this project, or we want to do
19 the least amount of spending on this project. Most of
20 those people who are pleading that we can't afford to do
21 this have their own priorities. Many of them are
22 supporting Light Rail, many of them are supporting the
23 Monorail. Some of them just want to plead the need to cut
24 taxes or to keep taxes down. I believe that pleading
25 poverty is an attempt to stop the argument for doing the

1 right thing about the Viaduct replacement, without really
2 ever allowing the arguments or the merits for all the
3 different alternatives to be considered.

4 I also think that it's absolutely not true that we
5 can't afford the project. In fact, we have both the tax
6 base and the revenue to afford it, and I can say this from
7 having looked at all the various bond rating agencies'
8 criteria, and certainly a \$4-billion dollar project or a
9 \$2-billion dollar project could be afforded easily by the
10 citizenry of Seattle, King County and the State of
11 Washington. We have the tax base, we also have the
12 opportunity to use non tax financing, as in tolls, for
13 instance. All of those could certainly pay for this
14 project over a reasonable period, 30, 40 or even 50 years
15 for financing.

16 My second point, the most expensive option is
17 usually not considered to be the best case. In many
18 projects people look for the lowest cost option. However,
19 in this case the most expensive option appears to be the
20 best option. And when we say the most expensive, I mean
21 the most expensive up front cost. In this case we're
22 talking about spending \$4-billion to build a tunnel to
23 replace the aerial viaduct. The other options, the aerial
24 option and the surface option, have some real deficiencies,
25 whereas the tunnel provides a great opportunity, not only

1 to meet the transportation problem, which it does quite
2 well, and actually provides better than any other
3 alternative for future transportation growth, but it also
4 fixes the problem of the Seawall, which needs to be
5 replaced, and frees up the space currently occupied by the
6 Viaduct. This permits the expansion and development of the
7 waterfront.

8 The aerial option would maintain the same dominance
9 that the current viaduct has over the land, and will
10 actually cause the transportation problem to not be
11 improved. We still will have to replace the Seawall,
12 regardless of whether we do the aerial option or a tunnel
13 option.

14 The surface option actually exacerbates the
15 transportation problem. It also dominates the land,
16 actually, in a much worse way than the aerial option does.
17 Worse, it cuts off the waterfront from the rest of the
18 city, causing that area to become potentially an
19 economically wasted area.

20 In addition, the aerial option and the surface
21 option actually lend themselves to earthquake
22 vulnerability, as that area is a fill area, and only by
23 building a strong, secure Seawall and proper foundations
24 can we ensure that that area is not subject to immense
25 earthquake damage.

1 I would say the bypass tunnel is also insufficient
2 in that the capacity of the tunnel is just not worth the
3 cost. If we're going to build a tunnel, we might as well
4 do it right and build the full tunnel.

5 My third point is we have an opportunity to develop
6 a waterfront neighborhood. The Mayor of the City of
7 Seattle has exercised leadership in this area, has been
8 conducting a community based effort to look at how we could
9 develop and strengthen the waterfront neighborhood and
10 develop strong ties with both the Downtown and the Bell
11 Town neighborhoods.

12 In addition, we can also provide for the stadiums in
13 providing parking and enhanced use of the stadium areas,
14 along with building a central area for community activities
15 in the area vacated by the old viaduct when it's torn
16 down.

17 What we need is a framework for financing this
18 project. First of all, we can and should receive federal
19 highway funds. Second, we should look to revenue bond
20 fundings. We can do this by securing the bonds through
21 toll collection and by establishing a local improvement
22 district for all the businesses which would benefit greatly
23 in the area of the waterfront. In this we should be
24 liberal. We should look all the way up to businesses on
25 Second Avenue, down to the waterfront, in establishing the

1 local improvement district.

2 Finally, we should look at some general obligation
3 bond financing, which would include property tax and
4 vehicle licensing tax revenue, as the basis for the general
5 obligation bond financing.

6 I also want to conclude by saying that I was
7 privileged at one time to listen to Ezra Solomon, who is a
8 tremendous Ph.D. economist, who talked about projects such
9 as the Viaduct replacement project. And he pointed out
10 that frequently when doing these projects people tend to
11 overlook the extraneous costs of doing a particular
12 alternative, and also overlook some of the benefits. He
13 called these spill-outs and spill-ins. In the case of most
14 of the options, there's a tremendous spill-in for the
15 project, in terms of the aerial options or the surface
16 option or even the bypass tunnel, and that is that they not
17 only do not directly solve the transportation unit, but
18 they don't lend themselves to developing the community.
19 There's a tremendous spill-out from the project, in a
20 positive way, in terms of the tunnel, where it does allow
21 us to greatly promote our community and to build a strong
22 Downtown, Bell Town and waterfront area, in addition to
23 providing for the transportation of today and tomorrow.

24 And so, I hope that those people who are deciding
25 upon how to do this project and on which options to

H-025-001

1 proceed, do not get caught up in a bigger type philosophy
2 of "We can't afford it." We absolutely can afford it, and
3 we absolutely should, in this case, build the most high
4 cost alternative, which is the tunnel. Thank you.

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H-026-001

ORAL TESTIMONY

PHIL ACOSTA: My name is Phil Acosta and I'm representing the I.N.L.W.U.

I have some concerns about the Viaduct project. One of them is to maintain a high volume access to Terminal 46, both during construction, and a permanent infrastructure to support a world class container terminal for the future. I have some issues involving the prospect of realigning the viaducts to Utah Street. I think that putting those viaducts, approaches from the south side, from just north of Spokane Street, to the current study area, behind the east of the current rail yard, the Zig yard, I think if we could realign there it would allow the port and the B.N. Zig yard to work a much closer and cleaner capacity. You could discharge the container ships at the what's now Pier 30 and Pier 25 and move that cargo freely into that Zig yard area, without having the impedance of the low level viaduct that comes off of Spokane Street there.

Approximately 1300 jobs are affected directly with the Terminal 46 area. And if you look here in the Seattle area, just about behind every business you'll notice that there's a container of one sort or another, parked in a shipping door at those businesses, and it's vital to the economic maritime businesses in the Seattle harbor that

H-026-001

The S. Holgate Street to S. King Street Viaduct Replacement project is under construction, and the lead agencies have coordinated closely with the Port of Seattle and BNSF to develop a design and construction approach that ensures freight access to Terminal 46, maximizes rail operations, and provides safe crossings at S. Atlantic Street.

Realignment of the corridor to the east was one idea considered early in the project, but it was not carried forward due to design constraints and potential impacts to the SIG rail yard. The lead agencies will continue to coordinate with the Port of Seattle and BNSF regarding construction of the preferred Bored Tunnel Alternative.

1 access to Terminal 46 is maintained and that a better
2 program of realignment to the south at Pier 25 and what's
3 now Pier 30 is addressed.

4 So, I would like to see the Port, the City, the
5 State Department of Transportation, sit down, and included
6 in that the B.N. Railroad, and work out a realignment of
7 that whole viaduct situation there where it would join the
8 new Downtown Seawall and Viaduct Project. Thank you.

9 **ANDREA MENIN:** I want to register my comments about
10 the Seawall and Viaduct replacement. I would like to see
11 them build a tunnel. Even though it's the most expensive,
12 it seems like the best alternative. I don't mind if it's a
13 bypass or a regular tunnel, as long as it gets tunnelled.

14 That's it.

15 What do you think, Anna?

16 **ANNA CREAN:** Same as her.

17 **ANDREA MENIN:** Same as me? Can you say it louder?
18 You kind of want an aerial thing, don't you?

19 **ANNA CREAN:** I don't really care.

20 **ANDREA MENIN:** You don't really care? Do you want
21 to be able to look down at the traffic, like you do now, or
22 do you want to be able to go underneath it?

23 **ANNA CREAN:** Look down at the traffic.

24 **ANDREA MENIN:** So she wants an aerial.

25 **AARON GOSS:** I think we should take the Viaduct down

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23 **ANNA CREAN:** Look down at the traffic.

24 **ANDREA MENIN:** So she wants an aerial.

25 **AARON GOSS:** I think we should take the Viaduct down

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H-027-001

H-027-002

H-027-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

H-027-002

FHWA, WSDOT, and the City of Seattle appreciate receiving your thoughts regarding the Draft EIS alternatives.

1 access to Terminal 46 is maintained and that a better
2 program of realignment to the south at Pier 25 and what's
3 now Pier 30 is addressed.

4 So, I would like to see the Port, the City, the
5 State Department of Transportation, sit down, and included
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23 **ANNA CREAN:** Look down at the traffic.

24 **ANDREA MENIN:** So she wants an aerial.

25 **AARON GOSS:** I think we should take the Viaduct down

H-028-001

Many people asked the lead agencies to consider an alternative that would remove the viaduct and replace it with a four-lane surface roadway along Alaskan Way and include transit improvements. Without a host of improvements and modifications, a four-lane Alaskan Way would create even more congestion on I-5 and downtown streets than the alternatives evaluated in the Draft and Supplemental Draft EISs. Transportation studies performed for this project indicate that replacing the viaduct with a four-lane surface street would substantially increase congestion for most of the day and part of the evening on I-5 through downtown Seattle, downtown streets, and Alaskan Way. On downtown streets, traffic would increase by 30 percent, though traffic increases to specific areas like Pioneer Square and the waterfront could exceed 30 percent. With a four-lane roadway, traffic on Alaskan Way would quadruple to 35,000 to 56,000 vehicles per day compared to about 10,000 vehicles today. This traffic increase would make Alaskan Way the busiest street downtown, carrying more traffic than Mercer Street does today. The increased traffic congestion would also make travel times worse for buses, making transit improvements along these streets largely ineffective. Finally, neighborhoods west of I-5 (Ballard, Queen Anne, Magnolia, and West Seattle) would be less accessible and would face longer commute times.

H-028-001

H-028-001

1 and replace it with a park and living space. I want that
2 to be one of the alternatives. Make it the sixth
3 alternative, the do nothing alternative.

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ORAL TESTIMONY

STEVEN W. ANDREASEN: Good evening. My name is Steven W. Andreasen, A-n-d-r-e-a-s-e-n. My address is 2000 Alaskan Way, Unit 157, Seattle, Washington 98121.

I'd like to offer the following comments in connection with the Draft E.I.S.: I am responding to the E.I.S. as a homeowner and on behalf of our family, which lives on Alaskan Way. The neighborhood in which we walk to work, engage in recreational activities, and shop, will be significantly impacted by the project, as described in the E.I.S. The project corridor is our front yard.

We recognize the need for dealing with the Seawall and the Viaduct, but believe that the E.I.S. does not adequately address the following points viewed from the perspective of a homeowner:

Point 1: The E.I.S. does not adequately address the options available to shorten the construction period by the complete closure of the construction corridor to through traffic. Diverting traffic away from the construction corridor during construction should be viewed as an alternative and considered in detail. This would reduce the period of impact on the residential neighborhood and its businesses.

Point 2: If through traffic in the construction

H-029-001

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

H-029-002

Further evaluation of construction traffic impacts has been included in the Final EIS and Appendix C, Transportation Discipline Report. This evaluation further defines and identifies traffic impacts caused by diversions onto surface streets, potential traffic volumes and congestion levels, and travel times. Additional information on economics can also be found in the Final EIS and Appendix L, Economics Discipline Report.

H-029-001

H-029-002

H-029-002

1 corridor is continued during the construction period, I do
2 not believe that the E.I.S. adequately assesses the way in
3 which the diverted traffic will flow and how it will impact
4 our neighborhood and its businesses.

H-029-003

5 Point 3: I do not believe that the E.I.S.
6 adequately addresses the impact on residential property
7 values within our neighborhood during and after the
8 construction.

H-029-004

9 Point 4: I do not believe that the E.I.S.
10 adequately assesses the impact on local businesses on which
11 we depend for daily services and goods.

H-029-005

12 Point 5: Parking is already at a premium in our
13 neighborhood. I do not believe the E.I.S. adequately
14 assesses the impact of the construction project on the
15 availability of parking for guests who may wish to visit
16 families living in the construction corridor, and for
17 others who need parking in connection with local
18 businesses.

H-029-006

19 Point 6: I do not believe there has been adequate
20 consideration given in the E.I.S. to mitigation measures to
21 preserve the livability of our residential neighborhood
22 during the construction period.

23 Thank you for the opportunity to provide these
24 comments.

25 WARREN FLAKERVIK, JR.: My comments on the E.I.S.

H-029-003

Please refer to Appendix L, Economics Discipline Report, where you will find discussion related the potential economic effects of the project. WSDOT cannot speculate as to how the various factors that influence property values will come together at some future time.

H-029-004

Additional economic discussion and analysis is presented in the Final EIS and Appendix L, Economics Discipline Report of the Final EIS. The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

H-029-005

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation. The parking mitigation strategies will continue to evolve in

coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide frequent parking updates
- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

H-029-006

As a neighbor adjacent to the existing Viaduct and project construction area, your concerns are acknowledged. The project will continue to coordinate with the residents and businesses along Alaskan Way through open houses, newsletter updates, and e-mail. Mitigation measures addressing noise, parking, traffic, dust and other factors of specific interest to residences and businesses are included in Chapter 8 of the Final EIS.

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2 not believe that the E.I.S. adequately assesses the way in
3 which the diverted traffic will flow and how it will impact
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7 values within our neighborhood during and after the
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25 WARREN FLAKERRVIK, JR.: My comments on the E.I.S.

4

H-030-001

Currently, freight trucks carrying flammable or combustible liquids, as well as other hazardous materials, are not allowed in the Battery Street Tunnel and would not be allowed in a new tunnel. Flammable and hazardous materials may also be precluded from an elevated structure, at the discretion of the Seattle Fire Department. Transport of these materials is prohibited on the existing viaduct during commute hours today. Measures will be in place to ensure that tankers carrying flammable or combustible liquids, as well as or other hazardous materials, can still move through the city on alternate routes. The project team is committed to working with the freight community to define alternative routes.

H-030-001

H-030-001

1 are pretty small, but at least they're very, very
2 important. The maritime sector that works in the
3 Lake Washington Ship Canal are primarily served by two
4 fueling facilities, one being Covich and Williams and one
5 being Ballard Oil.

6 The entire maritime industry is primarily served out
7 of four fixed facilities in the whole State of Washington.
8 It's our responsibility to assure that those maritime
9 fishing industry vessels are supplied with fuels,
10 lubricants, et cetera.

11 If we accept a tunnel solution based on the current
12 regulations of the Seattle Fire Department, which would be
13 the governing controlling agency, then it will be
14 impossible for us to remove combustible, flammable or
15 materials, primarily the combustible materials.

16 We need to service this industry from Harbor Island
17 to Ballard. There are days when we have a lot of business
18 with the fishing industry, and we can require as much as 15
19 truck and trailer loads a day from each of us, which
20 effectively could be 30 truck and trailer loads a day. So,
21 therefore, the tunnel solution requires that there be no
22 flammable, at least from the things we're seeing, to be no
23 flammable and/or combustible materials entering that
24 tunnel.

25 If we do a rebuild or an aerial solution, we will be

H-030-001

1 able to still remove those materials, as we do now, down
2 through that corridor. It's a major, major corridor for
3 the nation's largest fishing industry.

4 We have a large contention of tug boats and small
5 freighters that service Alaska that work out of Lake
6 Washington Ship Canal. It is, as far as I'm concerned, the
7 maritime capital of the world.

8 The only alternative, if we put a tunnel down, is to
9 put truck and trailers down to the surface street. With
10 the amount of tourism and the amount of conflicts that are
11 presented by pedestrians, buses, bicycles and other modes
12 of transportation, that the time to bring a load out to
13 Ballard would probably increase at least two to three
14 fold. We store, in our facility, about 45 thousand gallons
15 of diesel, and there are days that we move 150,000 gallons
16 through our facility. So, that transportation corridor is
17 essential for us to service this fishing industry.

H-030-002

18 The other thing that I'd like to comment on is that
19 the rebuild of the Alaskan Way Viaduct, as far as I can
20 see, would be the only option that will allow incremental
21 financing, that to come up with the financial burden of the
22 \$4-billion, or whatever it is, may not all be available at
23 once. But as we are well aware of the areas that are
24 compromised in Alaskan Way Viaduct now, that that Alaskan
25 Way Viaduct could be partially rebuilt as we go and rebuild

6

H-030-002

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Rebuild Alternative. After studying several retrofitting concepts, the lead agencies found that rebuilding the viaduct would not be a cost-effective, long-term solution that adequately addresses the risks to public safety and the weakened state of the viaduct. Elements of the Rebuild and Aerial Alternatives were incorporated into the Elevated Structure Alternative, which was analyzed in the 2006 Supplemental Draft EIS and the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

H-030-002

1 those structures that are in jeopardy of falling down and
2 interrupt this transportation corridor.

H-030-003

3 It is imperative that we do something, because if we
4 do nothing, or if we put it down on the surface, the link
5 between all the supplies needed for this industry will
6 drive the commercial fishing industry, and probably the
7 entire maritime industry, out of this area. And the only
8 viable place that I could see that they would go, would be
9 into Vancouver, Canada, who are the only ones, with NAFTA
10 and everything else, that would be receptive of receiving
11 this billion to \$2-billion dollars a year that comes into
12 this economy. This is part of the outside capital that
13 drives the City, and I think it really needs to be looked
14 at from an economic standpoint and what it means to
15 jeopardize the maritime community, since most of it is
16 housed and serviced from the shipyards and the facilities
17 out on Lake Washington Ship Canal.

H-030-004

18 And also, any one of the options must include a
19 northwest port hole out 15th Northwest, which is an access
20 by the Elliot and/or Western option. In a lot of the
21 preliminaries that list that connection as an option, that
22 isn't an option. It's a necessity. Everything that's
23 serviced on Magnolia, Queen Ann and Ballard, say probably
24 west of 8th Northwest, accesses the Viaduct via that
25 corridor. If we restrict that and compress it any more, it

7

H-030-003

Freight connections are important to the region, and the conditions for freight under each alternative are discussed in the Final EIS. While traffic during construction will be more difficult, providing a safe facility will benefit both the general public and the maritime community.

H-030-004

The Bored Tunnel Alternative does not include rebuilding the Elliott and Western Avenue ramps, while the Cut-and-Cover Tunnel and Elevated Structure Alternatives would provide these ramps. However, with the Bored Tunnel Alternative, access to and from neighborhoods and commercial interests would be provided by on- and off-ramps north of Denny Way, and in the stadium area just south of downtown as described in Chapter 3 of the Final EIS.

1 will just be grid-locked, no matter what have we do.

2 **NORMA SOARDAL:** I prefer the aerial construction for
3 replacing the Viaduct. Of course, we need a Seawall,
4 that's for sure. Thank you.

5 **ELWOOD R. LATTO:** I'm here to protest tearing the
6 Alaska Viaduct down because I don't think there's been
7 enough studies to look into repairing it. Because, it's
8 one of the jewels of Seattle. It's a jewel of the Seattle,
9 because how can we ever look at the Ocean when they put in
10 a tunnel?

11 And many people in this Seattle appreciate the
12 Viaduct when they go to work every day. I think they
13 should put more effort on the repairs to bring it up to the
14 earthquake specifications. And there's some studies out
15 now that say this is feasible. I think there should be
16 more effort in saving the Viaduct, than going through all
17 the expense that we would have to incur to replace it, no
18 matter what it is, and we don't have that type of money.
19 And we should have a committee to look into this.

20 That's the end of my — I think I should add also,
21 that the expenses incurred should be used in other ways,
22 because we're in big trouble here in Seattle. And it
23 appears that developers are pushing this more than common
24 sense.

25 **KATHLEEN McLOUGHLIN:** I'm for the tunnel. I think

H-031-001

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H-031-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Aerial Alternative. Elements of the Rebuild and Aerial Alternatives were incorporated into the Elevated Structure Alternative to meet today's safety standards while minimizing the effects of a wider structure. This alternative was analyzed in the 2006 Supplemental Draft EIS, and the design was refined in the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

H-032-001

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H-032-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Rebuild Alternative. After studying several retrofitting concepts, the lead agencies found that rebuilding the viaduct would not be a cost-effective, long-term solution that adequately addresses the risks to public safety and the weakened state of the viaduct. Elements of the Rebuild and Aerial Alternatives were incorporated into the Elevated Structure Alternative, which was analyzed in the 2006 Supplemental Draft EIS and the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

Repairing (or retrofitting) the existing structure has been analyzed as described in the 2004 Draft EIS, 2006 Supplemental Draft EIS, and the Final EIS. The lead agencies determined that repairing the existing structure would not be a wise investment, because it would cost 80 to 90 percent of a new structure, would only have one-third of the lifespan, and would not provide any safety improvements such as wider lanes and shoulders.

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H-033-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information. If the viaduct is replaced with a tunnel, very little land would become available for commercial or residential redevelopment. What land is freed up will be located in small parcels at sporadic locations along the waterfront where the viaduct is currently located. The Cut-and-Cover Tunnel would not be designed to support development on top of it and would occupy approximately two-thirds of the Alaskan Way right-of-way. Another major development constraint is the major utility lines running underground, both above and to the east of the tunnel. These major utilities, including very large drainage pipes, conveyance pipes, and electric transmission lines, all require ongoing maintenance access, which makes development infeasible.

H-033-001

H-033-001

1 the other ones don't really help with the traffic flowing
2 problem. I think esthetically it works the best, too, as
3 long as there isn't some hidden agenda of real estate big
4 guys. I think it's real important that we do this wisely,
5 because it's such a main thoroughfare, north and south, and
6 it can't all be rerouted all that time over to 5. It would
7 just be chaos.

H-033-002

8 And also, too, we as taxpayers "grudgingly" — say
9 this with quote marks around it — have funded two major
10 sports arenas, and now, if we don't plan this out very
11 well, we've just funded something that we're not going to
12 get people to and from, without just one big hassle. So,
13 as I see it, of all of the plans, it does, for me, come down
14 to doing the tunnel.

15 CONNIE HAYDEN: My comment that I would like to make
16 is in regards to who makes the final decision on which of
17 the kinds of transportation or the kind of viaduct that
18 they will build. And I would really like to see it put to
19 a vote of the people in Seattle, because they can come up,
20 usually, with what they want. Not that they are
21 trustworthy, but I would really like to have the people in
22 Seattle vote on the plan that they would prefer. That's
23 all I want to say.

24 DAVID SYFERD: Well, I've been hearing a lot of
25 people talking about this project and the alternatives, and

H-033-002

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

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H-034-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. After the 2004 Draft EIS was published, your comments along with others led to additional planning, analysis, and the revised alternatives presented in the 2006 Supplemental Draft EIS. Following publication of the 2006 Supplemental Draft EIS, there was not a consensus on how to replace the viaduct along the central waterfront. A public vote was held on March 13, 2007. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2004 Draft and 2006 Supplemental Draft EISs, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to identify the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront.

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H-035-001

1 I have been so appalled at some of the remarks. I have
2 detested the Viaduct for as long as I've lived in Seattle,
3 and that's most of my life. It is a visual obstruction, it
4 is an auditory imposition on its area, and it's awful. And
5 the idea that the view of a few people driving through
6 should be favored over the people who live, work, actually
7 get out of the cars and walk there, is incredibly selfish,
8 to my mind.

9 I don't like the surface solution because it puts a
10 freeway at the surface level, it would be awful, it would
11 make crossing dangerous, and the noise would be just as bad
12 as it is now. I don't like the aerial or the replacement,
13 because it's continuing the problem. The tunnel was
14 extremely expensive when it was first proposed, but they
15 have reduced the cost of it to the point that I don't see
16 why it should even be questioned anymore. The bypass is
17 too much of a cut. It doesn't serve the needs.

18 I think the choice is clear, you need to tunnel. We
19 need to stop talking about it, we need to start doing it,
20 we need to get it funded. And I hope that that's what
21 happens.

22 **BRIAN FREDERICK:** Okay. My name is Brian Fredrick,
23 and I am a resident, and I live on Alaskan Way, in
24 Seattle.

25 I would like to address two inadequacies of the CEPA

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H-036-001

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H-036-001

H-036-001

1 preliminary report. The first is I believe that there was
2 inadequate consideration of not maintaining the current
3 traffic flows during the construction period. It appears
4 to me that there seems to be a presumption that current
5 traffic flows have to be maintained during the construction
6 period. This may not necessarily have to be the case.

H-036-002

7 The other inadequate consideration that I would like
8 to have addressed would be the impact upon residential uses
9 in the affected area and, in particular, on Alaskan Way.
10 It seems to me that maintaining and encouraging a mix of
11 uses in the affected area is very important during the
12 construction period. I do not believe that the preliminary
13 CEPA has adequately considered the impact of the
14 alternatives on residential use. Thank you very much.

15 ELIZABETH FREDERICK: I am Elizabeth Fredrick, and I
16 live on the waterfront on Alaskan Way.

17 I am concerned about the large Battery Street
18 fly-over detour, I believe it's called, that you have a
19 picture of on one of these story boards. And I'm concerned
20 that that seems like a tremendous waste of taxpayer money
21 to go to the expense of building something like that.

22 And I'm also concerned that the project might run
23 out of money, and that that might be what we're left with.
24 It looks like a huge monstrosity that would greatly affect
25 the waterfront area and the vision that Satellites have of

11

H-036-002

The 2004 Draft EIS, 2006 and 2010 Supplemental Draft EISs, and Final EIS considered impacts on residential uses in the project area. Few direct impacts on residential properties were identified, and no residential displacements would occur along Alaskan Way.

As discussed in the Final EIS, residences immediately adjacent to the proposed project corridor may be affected by various construction-related impacts such as increases in noise, dust, and traffic congestion. The project would also displace existing parking spaces in the project area, which may affect visitors to residential and other properties on Alaskan Way. The discipline reports on Noise (Appendix F), Air Quality (Appendix M), and Transportation (Appendix C) address these impacts. Mitigation measures are also addressed in the discipline reports and in Chapter 8 of the Final EIS.

1 preliminary report. The first is I believe that there was
2 inadequate consideration of not maintaining the current
3 traffic flows during the construction period. It appears
4 to me that there seems to be a presumption that current
5 traffic flows have to be maintained during the construction
6 period. This may not necessarily have to be the case.

7 The other inadequate consideration that I would like
8 to have addressed would be the impact upon residential uses
9 in the affected area and, in particular, on Alaskan Way.
10 It seems to me that maintaining and encouraging a mix of
11 uses in the affected area is very important during the
12 construction period. I do not believe that the preliminary
13 CEPA has adequately considered the impact of the
14 alternatives on residential use. Thank you very much.

H-037-001

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18 fly-over detour, I believe it's called, that you have a
19 picture of on one of these story boards. And I'm concerned
20 that that seems like a tremendous waste of taxpayer money
21 to go to the expense of building something like that.

H-037-002

22 And I'm also concerned that the project might run
23 out of money, and that that might be what we're left with.
24 It looks like a huge monstrosity that would greatly affect
25 the waterfront area and the vision that Satellites have of

H-037-001

After the 2004 Draft EIS was issued, numerous comments were received relating to the visual impacts and other negative effects of the Battery Street Flyover Detour. As the design plans for the Cut-and-Cover Tunnel and the Elevated Structure Alternatives evolved, the Battery Street Flyover Detour was eliminated.

H-037-002

All funding plans under consideration would secure bonds or other commitments to ensure the project would be completed.

H-037-002

1 their city, as being a beautiful city. And I think one of
2 the beauties of it is the waterfront area.

H-037-003

3 I think also that the E.I.S. has not adequately
4 addressed the traffic flow on Alaskan Way, and the loss of
5 parking spaces, the loss of the public's ability to get to
6 the waterfront and be able to use the waterfront as a
7 necessity of everyday life in the city. Thank you.

H-037-004

8 I think that I neglected to say in my first comment
9 about the Battery Street fly-over detour that the E.I.S.
10 did not adequately address the costs and the inconvenience
11 of that structure.

12 KAARE ERGO: Okay. My proposal would be the tunnel
13 is the one that I would like to go with, the big one,
14 six-lane. And that's pretty much it. Basically, that's
15 it. I don't know what else I could add to it. I'd just
16 like the tunnel the best.

17 I guess that's all I have. I hope that that will
18 help. I don't know how much it will help.

19 **o0o**

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H-037-003

If the preferred Bored Tunnel Alternative is selected, the configuration of Alaskan Way will be determined by the City of Seattle's Central Waterfront Project. The configuration of Alaskan Way for the other build alternatives is described in Chapter 3 of the Final EIS.

Please refer to the Final EIS and its Appendix C, Transportation Discipline Report, for information regarding traffic flow, parking, transit, and pedestrian access for all the proposed build alternatives.

H-037-004

As noted in H-037-001, the Battery Street Flyover detour has been eliminated.

1 their city, as being a beautiful city. And I think one of
2 the beauties of it is the waterfront area.

3 I think also that the E.I.S. has not adequately
4 addressed the traffic flow on Alaskan Way, and the loss of
5 parking spaces, the loss of the public's ability to get to
6 the waterfront and be able to use the waterfront as a
7 necessity of everyday life in the city. Thank you.

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13 is the one that I would like to go with, the big one,
14 six-lane. And that's pretty much it. Basically, that's
15 it. I don't know what else I could add to it. I'd just
16 like the tunnel the best.

17 I guess that's all I have. I hope that that will
18 help. I don't know how much it will help.

19 **o0o**
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H-038-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

1 Ananta Sivam
2 810 South Southern Street
3 Seattle, Washington 98104

4
5 I came here today with very
6 specific and objective questions directly related to
7 the environmental impact of the structure and the
8 project. I'm seeing more of long-standing choice and
9 issues of -- choice issues and justification issues.

10 I would like to see addressed specifics such as:
11 In the proposed tunnel, how would we deal with the
12 exhaust fumes from 1,000 gridlocked cars? The
13 environment must be considered in the discharge side
14 of this ventilation system because auto exhausts are
15 harmful to the water systems. I have seen no plans
16 or proposals to address this issue.

17 Consider that the system would have to have 100
18 percent redundancy. Also consider that the
19 ventilation system would have to be independent of
20 the city-wide electrical power grid. Consider
21 planning for the stand-alone generator sets,
22 maintenance and operation thereof. This is just one
23 direct environmental issue that I'm not seeing
24 addressed here today.

25 I appreciate the walk-around format. I'm a

H-039-001

The tunnel's ventilation system is being designed with sufficient capacity to ensure that pollutant levels within the tunnel do not reach unhealthy levels during slow traffic conditions.

There should not be any impact of the tunnel's discharge on water systems, because essentially the same amount of emissions will be generated with or without the tunnel alternative. These emissions, which are generated by the vehicles traveling on the affected roadway, would be released directly into the atmosphere with an elevated roadway and indirectly via the vent stacks at the tunnel operations buildings and the tunnel's portals. However, since the total amount of emissions are the same, there should be no affect on the area's water system.

H-039-002

Since 2006, the plans for the ventilation system have evolved along with the alternatives. The ventilation system would not require 100 percent redundancy. The tunnel's ventilation system satisfies the National Fire Protection Association's (502) safety requirements for road tunnels. Please refer to the Final EIS and Appendix M, Air Quality Discipline Report for current information on ventilation and the tunnel operations buildings.

H-039-003

Thank you for your thoughts regarding the format of the meeting. We hope that the project representatives at the meeting were able to answer your questions and provide feedback directly to anyone who needed information. In order to encourage as much feedback as possible, we provided several options. At the hearings, attendees could submit comments on a written form, on a computer using an electronic form, or verbally to a court reporter. In addition to the meetings, the public could submit comments by mail or e-mail to the program team.

H-039-001

H-039-002

H-039-003

H-039-003

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little lost with the idea of no direct feedback,
which I would have in a face-to-face public meeting
with a representative. In conclusion, I would hope
the EIS would be more specifically focused and less
of a general proposal.

H-039-004

The program team often holds open-house format public meetings to provide as much flexibility as possible to the public. With an open-house format, hearing participants are able to come and go to the meetings as their schedules allow, making the meetings more convenient for many people.

H-039-004

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. As a result of the comments received on the 2006 Supplemental Draft EIS, additional planning and analysis was conducted and presented in the 2010 Supplemental Draft EIS.

After the 2006 Supplemental Draft EIS was published, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2006, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2006 Supplemental Draft EIS, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to identify the

Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront.

1 Bob Messina
2 1301 North 90th Street
3 Seattle, Washington 98103
4

H-040-001

5 I support the core tunnel project. I do not
6 support the elevated structure. Regarding the

H-040-002

7 seawall reconstruction, I would prioritize completing
8 the entire seawall as the first priority if the core
9 project could be expanded to do more construction.

10 That is to say, if I chose between a completed
11 seawall and a lowered Aurora, which of those two
12 would I prioritize, and I would choose the completed
13 seawall construction over the lowered Aurora
14 construction.

H-040-003

15 My second point is that as a taxpayer, I'm
16 willing to pay, but I would like to know what the
17 cost to me would be through higher utility payments
18 or other methods of payment.
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H-040-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2006 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2006, please refer to the Final EIS for current information.

H-040-002

With the preferred Bored Tunnel Alternative, replacing the seawall would be a separate project, because the failing seawall does not have the potential to affect the seismic stability of this alignment. The Cut-and-Cover Tunnel and Elevated Structure Alternatives include replacing the seawall. Please see Chapter 3 in the Final EIS for a description of the current configuration for each alternative.

H-040-003

Because of the very wide range of taxes and assessments, it is not possible to calculate exactly how project costs will affect individual taxpayers.

1 Harvey L. Rosenbloom
2 530 Tenth Avenue East, #104
3 Seattle, Washington 98102
4

H-041-001 | 5 I wish to have a tunnel and a greenway or I wish
6 nothing. I think every other politician in the city
7 and county has promised that. I'd like to see it
8 come to fruition.

9 I do not wish to see the original viaduct rebuilt
10 as such. I would like it opened up into a greenway
11 and a direct view to the sea.
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Public Hearing, 9/7/06 - Comments by Harvey L. Rosenbloom 6

H-041-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2006 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2006, please refer to the Final EIS for current information.

1 Tess Morgan
2 4701 Southwest Admiral Way
3 PMB 71
4 Seattle, Washington 98116-2340
5

H-042-001

6 I work at the University of Washington, and I'm
7 among 30,000 employees who serve a student population
8 who often don't have a lot of money and rely on the
9 busses, so I'm concerned about how easy it will be
10 for students to get to class. And in addition, I'm
11 hoping that someone could prioritize customer use to
12 aid access for older, disabled, and young-family
13 community members who may not have access to
14 alternative transportation during high congestion
15 times.

16 And I'm personally concerned about whether I can
17 keep my job with the ability to get to work on time,
18 so I will try to work a flexible schedule with my
19 employer, but I know the reality that some people
20 don't have that choice. So someone who depends on
21 the bus to get to work or lose their jobs, I'm hoping
22 those people can be considered a priority.

H-042-002

23 I submitted a letter. My second concern is
24 really preserving the environment while we do all of
25 this. Whatever I can do to help I want to try and do

H-042-001

While the University of Washington is not in the study area for the Alaskan Way Viaduct Replacement Project, highway corridors leading to and from the University could experience residual congestion due to traffic impacts from project construction activities. WSDOT, King County, and the City of Seattle have developed transportation improvements to minimize traffic effects during construction to keep people and goods moving. Mitigation measures would ensure that transit remains a viable option for passengers traveling in the project area. The lead agencies will also coordinate closely with transit providers throughout construction. In the Final EIS, construction details are described in Chapter 6 and mitigation measures are described in Chapter 8. Additional information on transit is also included in Appendix C, Transportation Discipline Report, of the Final EIS.

H-042-002

Protecting the environment is important to the lead agencies. The appendices to the Final EIS present an extensive amount of analysis conducted for both the built and natural elements of the environment. Mitigation measures have also been developed and are discussed in Chapter 8 of the Final EIS.

H-042-002

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because Seattle is a beautiful place, and it would be
a shame if a construction project took that away. So
thank you very much.

(Public comments concluded.)

1 Ryal White
2 Renton, Washington

H-043-001

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4 Basically, I favor the elevated rail system,
5 elevated transportation system, but I would also
6 incorporate a small personal transportation system,
7 which one system is called SkyTran, and they have a
8 website called SkyTran.net, and I'm passing out some
9 of this literature tonight.

10 Basically, it's just a design that was thought
11 about back in the mid '60s by General Motors, and the
12 price -- or the cost wouldn't be that much because
13 it's an old General Motors design. Basically, you
14 call them and tell them you'd like to build this
15 system. Like the states that fought to get the
16 Saturn plant built in their states, it would be the
17 same principle, and I believe General Motors would
18 run to build this project.

19 (5-page document attached.)
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Public Hearing, 9/12/06 - Comments by Ryal White

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H-043-001

The alternatives analyzed in the Draft EIS, 2006 and 2010 Supplemental Draft EISs, and Final EIS did not include items other than those directly relating to replacement of the existing viaduct. Other modes, such as the personal transportation system, do not address the project's purpose to protect public safety and provide essential vehicle capacity to and through downtown Seattle.

1 Andrea Menin

2 Seattle, Washington

3

H-044-001

4 I think the city council and the state government
5 should push for building a tunnel to replace the
6 Alaskan Way Viaduct to improve the view of downtown.
7 Even though I'm a West Seattleite and I use the
8 viaduct, but I think it's the most beautiful highway
9 in urban Washington, I still would rather have more
10 people be able to see the waterfront from downtown,
11 and I would like to get to North Seattle or downtown
12 quickly in a tunnel.

13 I think you should replace the seawall and make
14 it part of the tunnel wall; do it right for the next
15 hundred years and also do it quickly because it's
16 going to save money. Don't bother doing it in
17 medium-slow fashion, but just shut down the tunnel,
18 get people to change their behavior, and get it done
19 with even if it takes four years.

H-044-002

20 For mitigation, I would -- from the south end
21 anyway, I would like to see Fourth Avenue off --
22 Fourth Avenue ramps from the Spokane Street Bridge
23 reopened, Spokane Street widened, and surface streets
24 opened and without allowing parking so that you can
25 get downtown, bus routes, light-rail going as soon as

H-044-003

Public Hearing, 9/12/06 - Comments by Andrea Menin

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H-044-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2006 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2006, please refer to the Final EIS for current information.

H-044-002

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

H-044-003

The City of Seattle's S. Spokane Street Project is under construction, and a new ramp connecting eastbound S. Spokane Street traffic to Fourth Avenue S. opened in August 2010. This will help divert some in-

H-044-003¹

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possible. That's about it.

H-044-004

2

I'd like to see bike lanes included north/south and east/west. It seems like increased city traffic is making it more dangerous for cyclists because there's also an increased number of cyclists that I have observed.

H-044-001

7

My neighbor and good friend also wants a tunnel. My neighbor and good friend, who lives in North Seattle and comes down to West Seattle all the time, three times a week, still also wants a tunnel to improve the -- just improve the whole downtown city which she thinks would benefit the whole state. She thinks it will bring in money for the whole state. That's her opinion.

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bound traffic off of First Avenue S. New westbound on- and off-ramps from First Avenue S. to S. Spokane Street are expected to open in Fall 2011. Widening of the S. Spokane Street Viaduct from E. Marginal Way to Sixth Avenue S. is expected to be completed around May 2012.

Impacts to traffic during construction have been analyzed as part of the transportation planning process for construction and are described in the Final EIS Appendix C, Transportation Discipline Report. A comprehensive list of traffic mitigation measures, including the need for temporary parking restrictions on select streets during peak travel periods, have been identified and are included in Appendix C and Chapter 8 of the Final EIS. Mitigation measures will continue to be refined in cooperation with the lead agencies and other agencies.

H-044-004

Thank you for your comment regarding bicycle facilities. Bicycle access will be maintained during construction activities. At times, it will be necessary to reroute bicycles using temporary facilities/detours, but these detours will be designed to minimize any inconvenience. Mitigation measures for the project are described in Chapter 8 of the Final EIS.

1 Harold Bean
2 4105 Southwest Frontenac
3 Seattle, Washington 98136
4

5 To start off with, I watched them build the
6 viaduct. I watched them drive steel pilings down
7 until they wouldn't go any further. That was the
8 foundation. That took care of any seawall
9 deterioration, doesn't matter.

10 After the earthquake, I walked the length of the
11 viaduct and observed eight columns that were
12 fractured on the quake zone and 80 that were still
13 perfect. And that viaduct, even with a fracture on
14 it, is still carrying the load because of the heavy
15 steel that was put in it when it was built.

16 My feelings are a tunnel would be too dangerous
17 being on the fault line. The fracture would flood
18 and kill everybody that's in the tunnel if it
19 flooded. The street -- the tunnel function -- or
20 construction should be paid for by the adjacent
21 property owners. I paid for the property -- for the
22 street in front of my house, and let them pay for
23 that one.

24 For a very small fraction of the cost of a new
25 installation, the existing one could be repaired and

Public Hearing, 9/12/06 - Comments by Harold Bean

6

H-045-001

The preferred Bored Tunnel Alternative is a safe alternative. Generally, structural engineers agree that tunnels are one of the safest places to be during an earthquake, because the tunnel moves with the earth. No Seattle tunnels were damaged during the 2001 Nisqually earthquake, including the Mt. Baker and Mercer Island I-90 tunnels, Battery Street Tunnel, Third Avenue Bus Tunnel, and Burlington Northern Tunnel.

The bored tunnel would be built to current seismic standards, which are considerably more stringent than what was in place when the viaduct was built in the early 1950s. The bored tunnel design includes improving relatively soft, liquefiable soils found near the south tunnel portal. Emergency exits would be provided every 650 feet in the tunnel. Project engineers have studied current data on global warming and possible sea level rise and concluded that the seawall provides enough room to protect the tunnel from rising sea levels. The engineers also considered the possible threat of tsunamis during the design process.

H-045-002

Although costs are an important part of project planning and decision-making, they are purposely not part of the environmental review process.

The lead agencies recognize that retrofitting highways, roadways, and bridges is often a viable option to counter earthquake threats. However, unlike other bridges and structures in the area, it isn't practical to retrofit the viaduct by only strengthening one or two structural elements. Fundamentally, such fixes transfer the forces from one weak point in the structure to another, and the viaduct is weak in too many places. The concrete frames, columns, foundations, and even the soil under the structure don't provide enough strength by today's standards. The lead agencies have studied various retrofitting concepts, and all of these concepts fail to provide a cost-effective, long-term solution that adequately addresses the risks to public safety and the weakened state

H-045-002

1 useful for many years to come. There's no fractures
2 in the rest of the columns. I walked the whole
3 length of it. That's about the sum and substance of
4 it. It's very, very well built.
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of the viaduct. The lead agencies also determined that retrofitting 20 percent of the viaduct as discussed for the Rebuild Alternative is not reasonable.

1 Bridget Daly
2 Seattle, Washington
3

H-046-001

4 I think all of this is really clearly marked, and
5 the people that are here are getting, you know, good
6 information. I still think what I did when I came in
7 here which is that a tunnel is frightening to me, and
8 it might be not a reason to keep the elevated, but I
9 do think it has some of the best views in the city
10 and that they're open to everyone who drives on 99.

11 I'm not sure that if it was underground -- if it
12 was a tunnel that the space on top would be utilized
13 any better than it is now. Now it's used for
14 parking, and I'm not -- I don't think it would be a
15 destination point in terms of people seeing it as a
16 viewpoint.

17 I'm also worried that developers will come in and
18 that that open space will be sold to the highest
19 bidder. I don't know if there's anything in place to
20 prevent that from happening. And really one of my
21 biggest concerns, which is going to be a problem with
22 either choice, is easily getting from West Seattle to
23 any other place in the city north.

H-046-002

H-046-003

24 I am happy to see some of those issues being
25 addressed, like especially the Spokane Viaduct having

H-046-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2006 Cut-and-Cover Tunnel Alternative. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004 and 2006, please refer to the Final EIS for current information.

The Bored Tunnel Alternative might create some opportunities for development in the project area. It is expected that future development will be determined by economic conditions and zoning in place on adjacent parcels. Thus, while it is possible that adjacent parcels may attract development interests, land use regulations and economic forces will likely determine the type of development that occurs in the project area as discussed in Appendix L, Economics Discipline Report, of the Final EIS.

H-046-002

During construction there will likely be some delays to traffic travelling north from West Seattle. Please refer to Chapter 6 in the Final EIS and Appendix C, Transportation Discipline Report, for more information.

H-046-003

Although the construction of the new ramp is an element of the S. Spokane Street Project (independent from the Alaskan Way Viaduct Replacement Project), this connection will improve both traffic and transit access into downtown Seattle, especially during construction activities.

H-046-003
H-046-004

1 exits onto Fourth and so on. I think one thing that
2 could be improved is direct bus links to places other
3 than downtown, for example, Beacon Hill or the east
4 side. One of the reasons I infrequently take the bus
5 is because there's no busses that go directly to some
6 of the areas I like to go to.

H-046-005

7 One more concern I had about the layout of the
8 tunnel is that I have heard and read that some of the
9 companies that worked on Boston's "Big Dig" have
10 funded the advertising the tunnel option and
11 supported it, and that worries me.

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H-046-004

Thank you for your comment regarding new or additional direct bus service. It is outside of the scope of the Alaskan Way Viaduct Replacement Project to restructure the region's transit service systems. However, as part of the ongoing transportation planning during construction, mitigation measures have been identified to maintain and improve transit service, speed, and reliability throughout the region. Since the project is located in downtown Seattle, these measures do focus on local and regional connections to the downtown core. Please refer Chapter 8 of the Final EIS and Appendix C, Transportation Discipline Report, for further details on mitigation measures related to transportation.

H-046-005

Decisions on this project are made by the lead agencies, not firms or interest groups who pay for advertising of any kind.

1 John Dodd
2 2724 Walnut Avenue Southwest
3 Seattle, Washington 98116
4

H-047-001

5 The end of the Battery Street Tunnel, which does
6 not have a view of the waterfront, includes
7 improvements to Aurora Avenue, which is lowering
8 Aurora and remove overpasses, and I wanted to know
9 how much of that -- how much that was going to cost
10 and what portion of the viaduct money itself would be
11 directed to that end, I suppose how much cheaper
12 would the viaduct project be if it were not included.

13 And I know the City wants to do that eventually,
14 but I'm curious how much has been included in the
15 viaduct project. And that's pretty much it, and I
16 appreciate you taking the comment.
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H-047-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. As a result of the comments received on the 2006 Supplemental Draft EIS, additional planning and analysis was conducted and presented in the 2010 Supplemental Draft EIS. Because the project has evolved since comments were submitted in 2006, please refer to this Final EIS for the current information on the alternatives and cost estimates.

1 Diane Johnson
2 3042 Garlough Avenue Southwest
3 Seattle, Washington 98116
4

H-048-001

5 I would like Highway 99 to remain open during
6 construction to avoid terrible traffic. The Seattle
7 Department of Transportation map said that Highway 99
8 carries 100,000 cars a day, so that's why it should
9 remain open so that a terrible disruption does not
10 occur. I realize it's more expensive this way, but I
11 think it's necessary.

H-048-002

12 And I request that some new ramps be installed to
13 connect the West Seattle Bridge with Highway 99
14 southbound to get both -- well, to go both ways
15 between the West Seattle Bridge and Highway 99
16 southbound. It's surprising that those don't exist
17 already. There is people who -- for example, me, I
18 live in West Seattle, and I occasionally shop in
19 White Center or Burien and would like to use that
20 route.

H-048-003

21 Also I request that a full cloverleaf be
22 installed at the intersection of 99 and 518 in
23 Burien. This is a major intersection and a good way
24 to get to the airport, and I am surprised that that
25 doesn't exist already. It's just a partial

H-048-001

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

H-048-002

The City of Seattle's S. Spokane Street Project is under construction, and a new ramp connecting eastbound S. Spokane Street traffic to Fourth Avenue S. opened in August 2010. This will help divert some in-bound traffic off of First Avenue S. New westbound on- and off-ramps from First Avenue S. to S. Spokane Street are expected to open in Fall 2011. Widening of the S. Spokane Street Viaduct from E. Marginal Way to Sixth Avenue S. is expected to be completed around May 2012. Improvements south of S. Royal Brougham Way are not included in the scope of the Alaskan Way Viaduct Replacement Project.

H-048-003

1 cloverleaf, and it's necessary to wait for a red
2 light and make a left turn when going certain
3 directions.

H-048-004

4 I see in the plan that part of the plan is to
5 widen the Spokane Street viaduct and add a ramp to
6 Fourth Avenue South. I think that's a great idea.
7 Currently the ramp to Fourth Avenue South from the
8 West Seattle Bridge going westbound, currently that
9 ramp is closed. Apparently there was an accident
10 there a few years ago, and that's why it was closed.
11 I think it ought to be reopened.

12 And the First -- going westbound on West Seattle
13 Bridge, the First Avenue and the Fourth Avenue ramps
14 are rather badly done. They don't have a
15 deceleration lane to get in before you exit.

16 Therefore, people have to go pretty slow and make a
17 hard right turn, so I think that the Fourth Avenue
18 ramp should be reopened and that both of these should
19 be improved with a deceleration lane that a driver
20 can enter before they turn right onto the ramp.

H-048-005

21 I recommend that the tunnel alternative have
22 ramps added to get on and off Highway 99 in the
23 center of downtown, similar to today's ramps at
24 Columbia and Seneca Streets. This is because there
25 is so much traffic that would come from the center of

H-048-003

The Alaskan Way Viaduct Replacement Project limits extend only to S. Royal Brougham Way. The interchange at SR 518 is not included in the scope of this project.

H-048-004

The Seattle Department of Transportation (SDOT) is widening the S. Spokane Street Viaduct from East Marginal Way to Sixth Avenue S., which is expected to be completed around May 2012. The project's goals are to improve traffic safety and upgrade the structural and seismic performance of this roadway. A new ramp connecting eastbound S. Spokane Street traffic to Fourth Avenue S. opened in August 2010. New westbound on- and off-ramps from First Avenue S. to S. Spokane Street are expected to open in Fall 2011. SDOT has no plans to reopen the Fourth Avenue S. on-ramp to westbound S. Spokane Street, as the ramp no longer meets federal safety standards. Westbound traffic will need to exit at First Avenue S.

H-048-005

Midtown ramps will not be added to the Cut-and-Cover or Bored Tunnel Alternatives due to geometric limitations. Instead, access to SR 99 would be provided via a full interchange near Dearborn Street and S. Royal Brougham Way. From these new ramps, traffic destined for downtown would use the downtown street grid. Removing the Columbia and Seneca Street ramps under the Cut-and-Cover Tunnel Alternative and the preferred Bored Tunnel Alternative will help alleviate much of the congestion that is seen under existing conditions due to the redistribution of traffic accessing SR 99 to several east-west streets, rather than to a single street (i.e., Seneca or Columbia Streets).

Please see the Final EIS for the current configurations for all the proposed build alternatives.

H-048-005

1 downtown. Currently the tunnel drawing shows access
2 only at the far north and far south ends of downtown,
3 and this seems inadequate. This would force many
4 drivers to drive through Pioneer Square and the north
5 end of downtown, both of which are quite congested
6 all the time and would add perhaps ten minutes to a
7 person's commute during peak hours.

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1 Harvey Rowe
2 8850 Ninth Avenue Southwest
3 Seattle, Washington 98106
4

H-049-001
5 First of all, I want to thank you people for
6 coming down here and trying to explain this because
7 we as voters need to know what we're voting on, and
8 until we can really see pictures in detail, there's
9 no way we can get a halfway decent picture of this.
10 So I appreciate the fact that all these people came
11 down here and they're trying to help us out because
12 it's not an easy solution at all.

13 No matter what we do, it will cost us money, and
14 if we don't do anything, that's going to even be
15 worse, so I just -- I'll be looking forward to many
16 more meetings here and try to catch up with really
17 what's involved here. So I want to thank everybody
18 for all their good work. I'll be at many more
19 meetings, so I'll probably have more comments later
20 on, but until I understand, I have no way of knowing
21 how to vote.

22 (Public comments concluded.)
23
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H-049-001

Thank you for your participation. We hope you have found the information in the Final EIS useful.

1 Eugene Høglund
2 3503 - 30th Avenue West
3 Seattle, Washington 98199
4

H-050-001

5 I'm going to just be talking about the Alaskan
6 Way Viaduct Supplemental EIS. Number one, the view
7 blockage. Many of the Ballard and Magnolia, Queen
8 Anne, West Seattle residents and businesses enjoy
9 views of the Olympic, city, and the waterfront.
10 Under the tunnel alternative, they will be removed.
11 This impact is unmitigatable.

H-050-002

12 Number two, the direct construction impact on the
13 Ballard and West Seattle businesses, Duwamish
14 businesses, and residents are not adequately
15 discussed for either alternative. These impacts
16 include freight movement, business trips, commuter
17 trips, airport trips, and medical trips. The direct
18 impacts on these trips that are currently on SR 99
19 are not mitigatable.

20 The indirect construction impacts on businesses
21 in Ballard, West Seattle, and the waterfront,
22 residents are not adequately discussed for either
23 alternative. The closing of SR 99 and the Alaskan
24 Way surface streets will cause congestion throughout
25 the region. A particular concern will be the ten to

H-050-001

The views of Elliott Bay, Puget Sound, and the Olympic Mountains are prized by many. Views are currently enjoyed by motorists and passengers traveling on the upper deck of the existing viaduct. However, the views for motorists and pedestrians using downtown streets in the vicinity of the waterfront are interrupted by the existing viaduct structure. This structure is considered by some to be a substantial visual intrusion as well as a source of noise and shadow for the Pioneer Square Historic District and the Central Waterfront. Impacts to views are discussed in the Final EIS and considered in detail in Appendix D, Visual Quality Discipline Report.

H-050-002

Construction effects on the Ballard/Interbay, West Seattle, and Duwamish businesses and residents (due to their location outside the area of immediate impact) are not expected, with the exception of a decrease in freight mobility and increase in congestion/travel times for truck and vehicle traffic as they use alternative freight routes. The loss of freight mobility will have a resultant loss in productivity.

Effects to Downtown Seattle would be limited to those properties abutting the construction zone (east and west sides). The effects to the bulk of downtown Seattle will revolve primarily around the increase in congestion as traffic is displaced from the immediate corridor and is absorbed on the surface street network. The increase in congestion will have a resultant loss in productivity. These effects are discussed in the Appendix L, Economics Discipline Report, of the Final EIS as costs of congestion due to increase in travel times.

Access to essential public health services will be maintained throughout the viaduct construction. Users of these medical facilities may need to shift their mode of transportation from automobile to mass transit in order to reach medical facilities at the current level of service.

H-050-002

1 14 hours of delay on I-5. Many of the residents in
2 Ballard and Magnolia, due to the afflictions of
3 Swedish Hospital and the use of Swedish Hospital on
4 First Hill, with I-5 and other parts of downtown in
5 gridlock, the impact on these hospital visits could
6 be significant.

7 These indirect construction impacts are
8 unmitigatable. The increased greenhouse gases and
9 other pollutants from construction, gridlock,
10 detours, and the seven percent grade which will cause
11 congestible [sic] gridlock inside of the tunnel are
12 not adequately discussed for the tunnel alternative.
13 No reasonable alternative routes have been provided.
14 Idling traffic and gridlock will produce more
15 greenhouse gases than without these grades. These
16 impacts are unmitigatable.

17 Number five, the economic impacts of construction
18 delays. The EIS does not adequately discuss the
19 economic impact from the delays caused by the direct
20 or indirect construction impact of either
21 alternative. The job losses in Ballard, West
22 Seattle, Magnolia, downtown could be significant as
23 the raising of cost of finding employees could be
24 prohibitive. Cost of shipment increase, businesses
25 leaving the area without delays: These temporary and

H-050-002

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permanent impacts are unmitigatable.

H-050-003

2

Six, the traffic impacts from the seven percent grade in the tunnel. The impact of the seven percent grade in the tunnel were not adequately discussed.

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It will impact the movement of traffic on SR 99, particularly truck traffic. The various EISs do not adequately discuss these impacts.

5

6

The seven percent grade, if a truck were to slow or to stop because of blockage in the Battery Street Tunnel, a truck and some cars would have a difficult time getting moving again inside the grade, and the increased risk of fires in the tunnel because of these grades are unmitigatable.

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Number 7, the EIS does not discuss adequately the impacts of flammable and hazardous materials transported during and after construction for either alternative. The impacts could force Ballard and West Seattle businesses to close. These impacts are unmitigatable.

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H-050-004

H-050-005

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Number 8, the issues of the dangers of digging the tunnel over the Seattle fault and in a tsunami hazard area have not been adequately or are totally ignored in the Supplemental EIS and the Draft EIS. They were referred to as major faults in the EIS and the DEIS and are now being ignored because the

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H-050-003

Heavy vehicles constitute approximately 3 percent of the Average Daily Traffic (ADT) volume on SR 99 in the northbound direction. The traffic impact of the 7 percent grade would be mitigated because approximately 40 percent of the northbound trucks on SR 99 exit at Western Avenue and are in the outer lane, which is also a drop lane.

The right lane would act as a truck climbing lane for this percentage of trucks. The current on-ramp at Western (to northbound SR 99) would be restricted to emergency vehicle use only, removing many merge conflicts that exist today.

H-050-004

It is true that vehicles carrying flammable and/or combustible cargo would not be allowed to use the tunnel. They are not allowed in the Battery Street Tunnel today. These materials need to be transported along the surface streets, such as Alaskan Way. It is not the intention of this project to force West Seattle and Ballard businesses to close because of the inability to transport fuels and other petroleum products from Harbor Island to the Lake Washington Ship Canal; however, fire, life, and safety requirements for operating a tunnel structure would require additional transport time for petroleum product deliveries using the surface street network.

H-050-005

Both the Cut-and-Cover Tunnel and the preferred Bored Tunnel Alternatives are safe alternatives. Generally, structural engineers agree that tunnels are one of the safest places to be during an earthquake, because the tunnel moves with the earth. No Seattle tunnels were damaged during the 2001 Nisqually earthquake, including the Mt. Baker and Mercer Island I-90 tunnels, Battery Street Tunnel, Third Avenue Bus Tunnel, and Burlington Northern Tunnel.

H-050-005

1 Seattle fault has now been shown to be directly under
2 the proposed tunnel. This will put the people of
3 Seattle at risk, and this should not be ignored for
4 this condo development.

H-050-006

5 I have a very big concern over the lack of
6 oversight in the project itself in that there should
7 be -- because they have left the grades out of the
8 Supplemental EIS and the Draft EIS, it's an issue
9 that should not have been ignored in the Draft EIS
10 and the Supplemental EIS, and that has to be a
11 concern of if there was oversight in this document,
12 this would have been presented in a fair manner.

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The bored tunnel would be built to current seismic standards, which are considerably more stringent than what was in place when the viaduct was built in the early 1950s. The bored tunnel design includes improving relatively soft, liquefiable soils found near the south tunnel portal. Emergency exits would be provided every 650 feet in the tunnel. Project engineers have studied current data on global warming and possible sea level rise and concluded that the seawall provides enough room to protect the tunnel from rising sea levels. The engineers also considered the possible threat of tsunamis during the design process.

H-050-006

This comment requests a level of detail that is not required for the analysis of the build alternatives to comply with NEPA and SEPA. The design for the proposed build alternatives are not final and are still being refined. The final design of the selected alternative for this project, including grades, will comply with WSDOT and American Association of State Highway and Transportation Officials (AASHTO) roadway design standards.

1 Linda
2 Seattle, Washington

H-051-001

3
4 First of all, they're using highway funds for
5 urban renewal, which I think is illegal, because if
6 they tear down the viaduct, they're planning on doing
7 urban renewal, so that means highway funds are being
8 inappropriately appropriated.

9 And secondly, for lack of foresight on part of
10 Mayor Nickels and his predecessors, they haven't set
11 aside money for the infrastructure of the City. It's
12 not a very glamorous thing to put money aside for,
13 but they have not maintained the seawall. Now
14 they're asking for highway funds to repair and
15 replace the seawall, and cleverly on their part,
16 including it as the western wall of the tunnel so
17 that what was city infrastructure is now becoming a
18 state highway problem, and I think that again is
19 illegal use of highway funds.

20 Another thing I'd like to add, that recently
21 Boeing was involved, engaged in a contract to put I
22 believe it was people on the moon, and interestingly,
23 the budget that was allocated for it was \$4.2
24 billion, and the City is asking for \$4.2 billion
25 dollars to build a highway that's less than two miles

Public Hearing, 9/13/06 - Comments by Linda

7

H-051-001

Funding infrastructure maintenance and replacement, such as for this project, is a long-standing challenge for many jurisdictions and agencies such as WSDOT and the City of Seattle. Please note that the lead agencies have identified the Bored Tunnel Alternative as the preferred alternative for this project. If this alternative is selected, the replacement of the seawall would occur under a separate project, the Elliott Bay Seawall Project, led by the City of Seattle. See the Final EIS for current project information, including estimated cost for all of the proposed build alternatives.

H-051-001

1 long, and I think there's something definitely wrong
2 with that.

3 I think that Seattle is asking for funds -- that
4 amount of funding from their taxpayers and not taking
5 into consideration all the other issues that need to
6 be addressed in this city, and they're not building
7 it to expand traffic but just maintaining what we
8 have.

9 I just drove on the viaduct this evening, and
10 part of it was four lanes and part of it was three
11 lanes, and it was completely jammed in both
12 directions and moving very slowly, and to spend \$4.2
13 billion to just put us in the same situation only
14 under the water seems to me a very poor decision on
15 the part of our city leaders.

H-051-002

16 Another issue is that we come to these meetings
17 and it feels that as citizens of this city, we really
18 don't have any say in the matter. It's being always
19 sold the program with your fancy drawings, and
20 they've already decided that that's what they're
21 going to do. They just now have to keep trying to
22 convince the public. The public really doesn't have
23 much say in the matter. It's just a question of
24 making a decision by the politicians to provide
25 opportunities for developers to make a lot of money

H-051-002

The purpose of the EIS public hearings is to provide information to the public and to solicit public comments such as this. The comments are part of the information considered by the federal, state, and local officials responsible for making decisions on the project.

H-051-002

1 rebuilding the city over and over again and for the
2 developers to keep the elected officials in office by
3 getting those kinds of contracts.

H-051-003

4 It doesn't feel right, and I've seen people's
5 taxes going up and continuing to go up, if all these
6 measures pass, to the point that it will be a city
7 where children are not comfortable here because young
8 families are not able to live here and older people
9 are also not going to be able to live here because
10 they can't afford to pay the taxes on their
11 properties.

12 Many of them have lived here and stuck with this
13 city for 30, 40, 50, 60 years, and it will become
14 just a place for young people that have moved here
15 that make a lot of money and nothing looks really
16 totally acceptable to a wide range of diversity of
17 population, not only cultural diversity, but people
18 of diverse ages and diverse incomes.

H-051-004

19 I am in favor of maintaining the viaduct. I
20 don't know that most people in the city truly believe
21 the things that you hear on some of the public
22 hearings that are aired on public radio about that
23 Mother Nature is going to destroy the viaduct,
24 according to our head of Department of Transportation
25 throwing out terms like that to the general public

H-051-003

Taxes are affected by many factors that this project cannot control. The project is working with the local businesses and residents to mitigate the impacts of construction as described in Appendices G (Land Use Discipline Report) and L (Economics Discipline Report) of the Final EIS. Neighborhoods are discussed in Appendix H, Social Discipline Report.

H-051-004

The lead agencies recognize that retrofitting highways, roadways, and bridges is often a viable option to counter earthquake threats. However, unlike other bridges and structures in the area, it isn't practical to retrofit the viaduct by only strengthening one or two structural elements. Fundamentally, such fixes transfer the forces from one weak point in the structure to another, and the viaduct is weak in too many places. The concrete frames, columns, foundations, and even the soil under the structure don't provide enough strength by today's standards. The lead agencies have studied various retrofitting concepts, and all of these concepts fail to provide a cost-effective, long-term solution that adequately addresses the risks to public safety and the weakened state of the viaduct. The lead agencies also determined that retrofitting 20 percent of the viaduct as discussed for the Rebuild Alternative is not reasonable.

H-051-004

1 when, in fact, that's a vague statement that doesn't
2 mean anything.

3 And because of the way that the viaduct was
4 constructed, I don't think you can use examples of
5 San Francisco and other places where there's been a
6 collapse because this viaduct is built in sections
7 and it has turns in it, which makes it stronger.
8 There have been a number of engineers who have
9 studied it, and their opinion is that it's sturdy and
10 will withstand many more years.

11 So usually a study has the results of what it is
12 the people doing the study want to hear. For
13 example, a cigarette company, tobacco company
14 determining that cigarettes don't cause cancer is
15 what you feel like what's happening, all the
16 arguments about why the viaduct is about ready to
17 collapse.

18 There's only about three or four or five
19 sections, pillars of viaduct that need repair, and
20 that kind of repair is done on a number of other
21 bridges in the city, and it seems that you could
22 repair those sections for a fraction of the cost and
23 probably have a structure that you can rely on for
24 the next fifty years. And by that time, who knows
25 what kind of transportation issues we might have.

H-051-004

1 People might use hovercraft to get to work or do a
2 lot of telecommuting, and I think that we're going
3 back and looking historically at things like tunnels
4 and subways and using that old technology and not
5 looking at things that might happen in the future.

H-051-005

6 I would add that this is public funds and,
7 therefore, there seems to be no limit, but you've got
8 privately held commercial buildings all around the
9 viaduct that are also part of the infrastructure that
10 might be in jeopardy if, in fact, the seawall is in a
11 state of disrepair. And you don't hear anything
12 about those kinds of structures having to be replaced
13 or repaired soon because there just isn't the funds
14 to do it, but the taxpayers are an endless source of
15 money for our politicians. Always going to be more
16 money there. You never have to worry about limited
17 funds or limited budgets because you can just
18 increase the taxes.

H-051-006

19 And there are other bridges in the city that they
20 say that if we don't replace the viaduct we're going
21 to end up with a collapse and killing, you know,
22 hundreds and thousands of people, but by the time
23 they get done with this tunnel, it's possible that
24 you might have that structure standing and everything
25 else in the city is down. So yeah, you might have a

H-051-005

The lead agencies are committed to ensuring that the state, local, and federal public funds are spent effectively.

H-051-006

WSDOT developed a technique for cost estimating, called the Cost Estimate Validation Process, or CEVP, in 2002. This process is being used across the state and has proven itself much more accurate than previous methods.

The bored tunnel cost estimate is based on CEVP. This process uses outside experts to help establish a more comprehensive budget at the early stages of a project and identify risks that need to be actively managed. It takes into account project changes, mitigation, inflation and risk--something projects that experience cost overruns generally fail to do.

Independent experts and cost estimators experienced in tunnels, underground construction and megaproject delivery have reviewed the bored tunnel cost estimate. The viaduct replacement program also has a technical advisory team with more than 295 years of collective experience delivering projects around the world that provides guidance on risk management, construction methods, and oversight.

H-051-006

1 viaduct or a bridge or a tunnel that's
2 earthquake-safe, but everything else in the city is
3 going to collapse. What about I-5? What about all
4 the other bridges and highways and buildings that are
5 not up to the amount of earthquake protection that we
6 expect to have within a structure on Highway 99?

7 The Department of Transportation has a history, a
8 very sorry history in this state of poor prediction
9 and planning for bridges and highways and staying on
10 budget and staying on time. And, you know, the Hood
11 Canal Bridge, the Tacoma Narrows Bridge, and with
12 that in mind and what we know about "Big Dig" in
13 Boston, there's no possibility that this project is
14 going to come in on time and on budget. History will
15 tell you it's not going to happen.

H-051-007

16 But once you're committed, you've torn down the
17 viaduct to start on the tunnel, then you're stuck.
18 You've got to spend whatever money, millions of
19 dollars and years and years and years to complete the
20 project. And who's going to pay for it? Anybody who
21 can still afford to live in the city.

22 Since this evening is about the Environmental
23 Impact Statement, I would have to say that I think
24 that just as a novice, you would have to know that
25 trying to build an underground underwater tunnel on

H-051-007

The multi-disciplinary project team is well aware of the many challenges you describe. These issues, including archaeological and cultural resources, geologic and soils conditions, etc., are discussed throughout the Final EIS. These issues are also factored into the project's design budget.

H-051-007

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the shore of the city of Seattle where it was fill and it was an estuary at one point, it's a swamp probably, and you've got the tides coming in, and you might have had Indian burial grounds in the area. I mean, there's just so many big red signs that say this is going to be a problem that's not going to go easy and it's guaranteed it's going to go over budget and we're going to run into environmental issues.

H-051-008

And once the tunnel, if it ever was completed, I don't think that it's going to truly be safe because there's potential for a disaster with an earthquake that might cause part of it to crumble.

H-051-009

The other issue I think is the cost to maintain a tunnel like that out in the Sound, that constant maintenance that would be required as compared to the maintenance that's never been done on the viaduct and it's still a smooth-running highway and it, for the most part, handles traffic. There's no opportunity for head-on collisions. All part of the day except after 5:00 until about 6:00 it handles the traffic well. It's a beautiful gateway into the city and out of the city, and I don't think people feel safe in a tunnel out in the crumbling seawall in the city of Seattle.

H-051-008

The preferred Bored Tunnel Alternative is a safe alternative. Generally, structural engineers agree that tunnels are one of the safest places to be during an earthquake, because the tunnel moves with the earth. No Seattle tunnels were damaged during the 2001 Nisqually earthquake, including the Mt. Baker and Mercer Island I-90 tunnels, Battery Street Tunnel, Third Avenue Bus Tunnel, and Burlington Northern Tunnel.

The bored tunnel would be built to current seismic standards, which are considerably more stringent than what was in place when the viaduct was built in the early 1950s. The bored tunnel design includes improving relatively soft, liquefiable soils found near the south tunnel portal. Emergency exits would be provided every 650 feet in the tunnel. Project engineers have studied current data on global warming and possible sea level rise and concluded that the seawall provides enough room to protect the tunnel from rising sea levels. The engineers also considered the possible threat of tsunamis during the design process.

H-051-009

Maintenance costs for alternatives have been calculated and are included in the overall cost estimates. The Bored Tunnel Alternative would have a stacked configuration with northbound and southbound traffic completely separated so head-on collisions would be unlikely. Please note that the deteriorating seawall would be replaced under the Alaskan Way Viaduct Replacement Project if the Cut-and-Cover Tunnel or Elevated Structure Alternative is selected. Replacing the seawall would be a separate project if the Bored Tunnel Alternative is selected, because the failing seawall does not have the potential to affect the seismic stability of this alignment. Please see Chapter 3 in the Final EIS for a description of the current configuration for each alternative in the project area.

1 Clare Bowman
2 7002 - 24th Avenue Northwest
3 Apt. 301
4 Ballard, Washington 98117
5

H-052-001

6 There are a lot of complicated issues, but I'd
7 just like to narrow it down to one of those many, and
8 that is that I understand in the proposed
9 construction of the tunnel, they show a seven percent
10 grade down into it and out, and I have not seen that
11 shown on any of the schematic drawings anywhere.

12 Are they purposely hiding that fact? I know it's
13 public fact, but that is a very important issue for
14 people to consider, a seven percent grade down into
15 the ground and back up again, and I'd like to know
16 whether they will improve the presentation to include
17 that information.
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H-052-001

The grades for the Cut-and-Cover Tunnel Alternative are approximately 7 percent in the northbound direction, both entering and exiting the central waterfront tunnel. In the southbound direction, the entering grade is approximately 7 percent, but the exiting grade is 6 percent. The grades shown are correct; however, the design for this alternative is still considered preliminary.

Please see the Final EIS text for updated information on the three build alternatives, including the Cut-and-Cover Alternative. which this comment refers to.

1 H. Pat Murray
2 15542 Burke Avenue North
3 Seattle, Washington 98133
4

H-053-001

5 I came down tonight because of remarks Mayor
6 Nickels has persisted in making about the
7 overwhelming desire to build a tunnel project, and I
8 wish to refute that on my part and accuse the mayor
9 of being duplicitous, having a hidden agenda, and
10 saying things that weren't true, will not be true, in
11 order to cast the viaduct in the worst possible light
12 possible.

13 I feel that the engineering solution that is the
14 lowest cost and has the most flexibility built into
15 it is the best route to go, and I deeply resent the
16 mayor attempting to say or show that we would lose
17 all of our views by the way he would have it
18 constructed if it were a viaduct as engineering
19 standards can dictate any number of options,
20 restrained only by the materials and engineering
21 design used.

H-053-002

22 I think public safety is compromised inherently
23 by having a below-grade waterfront tunnel. Blasts of
24 a nature similar to the early attempts on the World
25 Trade Center, which were vans loaded with explosives,

H-053-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments.

H-053-002

All reasonable measures would be taken to make the tunnel as safe and secure as possible. The structure will be far more robust than the existing viaduct. Emergency exits would be located approximately every 650 feet and would be built to conform with the current Fire and Life Safety code. The City of Seattle also has an Emergency Management Plan to be put in place in the event of explosions, major accidents, or other potential major emergencies involving the tunnel.

H-053-002

1 placed at each end of the viaduct -- or at the tunnel
2 during rush hour would lead to a catastrophic loss of
3 life and inability to use the roadway for an extended
4 period of time compared to the time it would take to
5 repair a viaduct, which is an open structure, from
6 the same power of explosives.

H-053-003

7 In this world, with us being a port city and
8 already having a demonstrable track record of
9 terrorists attempting to enter the state shows that
10 they're already aware of what they can do to this
11 town. The alternative process proposed by I think
12 it's Victor Gray -- it's over on the far wall --
13 retrofit is not enough, Bulletin 09.06, speaks to an
14 issue I saw on one of the public channels as an
15 alternative to either the tunnel or the State's plan
16 to fix the viaduct.

17 To me, its chief benefit is the roadway would not
18 be completely shut down at any time during the
19 project. This to me makes it a highly desirable
20 alternative to either the mayor's or the State's
21 plans, and I think that just because Victor brought
22 it up does not mean we should not give the plan
23 complete and total scrutiny and maintain an open mind
24 on whether or not it will be structurally viable and
25 within normal cost parameters.

H-053-003

An independent Evaluation of Gray's Retrofit Proposal (July 31, 2006) was prepared for WSDOT by TY LIN International. The evaluation found that the proposal makes some improvements but that the foundations of the viaduct would still remain vulnerable to earthquake damage.

Completely closing SR 99 during construction is a concern for many people. FHWA, WSDOT, and the City of Seattle have carefully considered the trade-offs between the amount of time that construction would take and keeping SR 99 open to traffic. The Final EIS describes the current construction approach for each alternative.

H-053-004

1 I think that there is a strong bias towards the
2 tunnel by developers and by the mayor because of the
3 benefits financially to both parties, not only the
4 immediate changes along the corridor that would
5 result to developers, but the follow-on changes in
6 the character of the city waterfront would generate a
7 huge amount of revenue far in excess of that which
8 would be generated by maintaining what we have. And
9 the mayor would benefit because of more tax revenues
10 coming in from the same area.

11 None of this considers benefit to the citizens of
12 the area as a whole, only to special interest. And I
13 feel that the viaduct is a working structure, our
14 waterfront is a working waterfront, and I personally
15 would like to see it that way. I do not want to see
16 all of Seattle yuppified into a cutesy place like
17 Leavenworth. It's a working location just like South
18 Seattle south of the Kingdome is a working part of
19 town.

H-053-005

20 I am concerned about the wisdom of having only
21 one major north/south traffic corridor during the
22 time of construction of the viaduct alternative. If
23 something happens to I-5, we really don't have an
24 alternative method of getting through town, and if
25 you have it at the wrong spot, you can't even get

H-053-004

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Elevated Structure Alternative. Because the project has evolved since comments were submitted in 2006, please refer to the Final EIS for current information.

H-053-005

Construction of a new major north/south traffic corridor in the project area to accommodate construction traffic or future traffic increases has been determined not to be feasible. Construction impacts are described in Chapter 6 of the Final EIS. Traffic conditions on city streets and I-5 during construction are expected to be more difficult than what is being experienced today. Mitigation measures will be in place as described in Chapter 8 of the Final EIS.

H-053-005

1 onto 405 from the south end because everything comes
2 very close together down there at Renton.

3 So I would like to see a plan that maintains an
4 alternative to I-5 in the worst possible case
5 scenario, not only during the construction of the
6 viaduct, reconstruction or refit or whatever it is,
7 but ongoing into the future.

H-053-006

8 We need flexibility. Catastrophic events happen.
9 Nothing will ever stop them, and there's no
10 predicting what they'll be or when they will occur,
11 so we need to have alternatives already set up, in
12 place as just a normal way of doing business, and I
13 think that the viaduct's placement the way it exists
14 as it exists is the best way of doing that, and I
15 would favor Victor's alternative plan.

16 We do not need to get rid of construction debris
17 before you can start the project. You can reinforce
18 the structure along its length wherever engineering
19 necessities occur with the best possible
20 state-of-the-art construction methods at the time.

21 Ideally, I would like to see a design that
22 increases capacity through the area, that increases
23 the throughput of automobile traffic, including our
24 large trucks and other vehicles that maintain the
25 lifeblood flow in the Seattle area, and I think his

H-053-006

FHWA, WSDOT, and the City of Seattle are moving forward to implement the project. Please see the response to comment H-053-003 concerning Gray's Retrofit Proposal. The alternatives studied in the Final EIS will maintain capacity to efficiently move people and goods to and through downtown Seattle.

H-053-006

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design would do that more cost-effectively than any
other alternative put out by other parties.

(Public comments concluded.)

1 Jack Whisner
2 8325 Eleventh Avenue Northwest
3 Seattle, Washington 98117
4

H-054-001 5 I'm dissatisfied with both of the preferred
6 alternatives. The six-lane cut-and-cover tunnel is
7 too expensive and provides too much limited access
8 capacity. And the six-lane replacement viaduct does
9 the same. It has the additional flaws of being too
10 big and too ugly and also continues to provide
11 freeway ramp access to Seneca and Columbia Streets,
12 which is harmful to our urban fabric in downtown
13 Seattle.

14 I would like the City and State instead to
15 consider an alternative that they rejected during the
16 first phase. That is the bypass tunnel alternative,
17 a four-lane cut-and-cover tunnel with two features
18 added to it, so it would be a hybrid option,
19 borrowing things from the preferred options.
20 It should have ramps to and from Interbay at Western
21 and Elliot Avenues and also should have dynamic
22 tolling.

23 The southbound ramp at Elliot may require that
24 that intersection be signalized so that when vehicles
25 enter from southbound Elliot Avenue, the lanes coming

H-054-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Bypass Tunnel Alternative. However, the Bypass Tunnel Alternative was not carried forward because the traffic analysis showed that it did not maintain mobility and accessibility.

H-054-001

1 out of the battery street tunnel may have to be
2 stopped. But on East Marginal Way, further south on
3 State Route 99, we have at least four signals in a
4 six-lane profile, so we need not build the
5 replacement to accommodate 70-mile-an-hour traffic
6 through our downtown.

H-054-002

7 Dynamic tolling has the potential to more
8 efficiently allocate lane space. It will provide an
9 incentive to drivers to drive at off-peak periods
10 when the demand is less, to shift their use to other
11 times of the day when there is plenty of capacity.

12 Today the viaduct is actually rarely congested.
13 Only it's access points are congested, the on-ramp at
14 Elliot, the off-ramp at Western, and the ramps at
15 Seneca and Columbia, but there is more than
16 sufficient through capacity provided, and the two
17 preferred alternatives actually increase that
18 capacity by adding wider lanes and shoulders. You
19 need not do that.

20 I suspect that the bypass tunnel would be
21 affordable with the monies that we have on hand and
22 that it has all the urban planning benefits of the
23 six-lane tunnel without the fatal flaw of excessive
24 cost.

25 I want to make one more remark about dynamic

H-054-002

WSDOT is evaluating tolling on SR 99 as discussed in Chapter 5 of the Final EIS.

H-054-002

1 tolling. The region has experienced this kind of
2 issue twice before and come away as a leader. Once
3 in the late '70s, we were dealing with the WPPSS
4 nuclear plants, and the City of Seattle analyzed the
5 situation and applied the law of demand and showed
6 that with higher electrical rates, less power would
7 be demanded, and we didn't actually need the increase
8 in capacity that would have come from the WPPSS
9 plants.

10 And again, when we felt the solid waste crisis
11 and we were contemplating burning the waste or
12 running out of landfill space, instead we went with
13 higher garbage fees and recycling.

14 And so in both those cases, the law of demand was
15 applied, and the same thing would happen if we went
16 to system-wide dynamic tolling of our limited-access
17 highways. At the same time the viaduct is going to
18 be replaced, we're going to be working on other mega
19 projects, and so we really need to have system-wide
20 dynamic tolling, 520, I-90, I-5 reversible lanes.

H-054-003

21 My next comment is about the phasing of the
22 viaduct project. It seems to me that it's very
23 difficult to do when Mayor Nickels plans to do it
24 beginning in 2010 or 2011 because at that time, the
25 transit capacity of downtown Seattle is still rather

H-054-003

Since the 2006 Supplemental Draft EIS, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

H-054-003

1 limited. The South-First Link light-rail alignment
2 actually limits the transit capacity of downtown
3 Seattle. We really ought to wait to do -- to shut
4 the viaduct down to the time when we have two-way
5 light-rail service in the tunnel.

H-054-004

6 There are some mitigation features that don't
7 seem to be actively under consideration right now.
8 One would be better control of the I-5 reversible
9 lanes. The ramps at Mercer Street and Stewart Street
10 now allow SOVs, and that leads to excessive traffic
11 congestion on Mercer Street, Fairview Avenue, Howell
12 Street, Stewart Street, Olive Way, and that slows
13 transit and makes transit less attractive.

14 If we could restrict those ramps, we could make
15 transit more attractive and better achieve the
16 mode-split goals of the city of Seattle in the face
17 of the viaduct project.

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H-054-004

Optimizing freeway ramp and express lane operations will be an important factor in how transit and general purpose traffic can navigate I-5 during major construction of the Alaskan Way Viaduct Replacement Project. Chapter 8 of the Final EIS and Appendix C, Transportation Discipline Report, list strategies that are being considered to help manage traffic during project construction. The lead agencies will continue to work with all local transit agencies to ensure that transit services can maintain reasonable levels of service quality on I-5 and provide a viable alternative to the single-occupant vehicle.

1 Linda Strandberg
2 Seattle, Washington
3

H-055-001

4 I think that the viaduct functions as a major
5 highway and without that thoroughfare, the city would
6 be put into a tailspin as far as transportation is
7 concerned, and I think that the responsible thing for
8 the City and State to do at this point would be to
9 explore as many of the retrofit options as they can
10 worldwide, comparing our situation to other retrofit
11 projects that have taken place and keep working on
12 finding a solution that is not a tunnel built on a
13 fault through seismically unstable soil near a
14 seawall because I for one would not choose to drive
15 in a tunnel in that situation.

16 And I feel that whether it's a bridge or another
17 elevated structure or some other fantastic solution,
18 we need to work on it more before we choose to make a
19 hasty decision to build a tunnel because it benefits
20 certain people, because I have to live here and I
21 have to drive in the city, and I don't understand how
22 the city could possibly function with the traffic as
23 congested as it gets on I-5 as it is without the use
24 of a viaduct.

25 And I don't believe that there's any way of

H-055-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the tunnel alternatives.

The preferred Bored Tunnel Alternative is a safe alternative. Generally, structural engineers agree that tunnels are one of the safest places to be during an earthquake, because the tunnel moves with the earth. No Seattle tunnels were damaged during the 2001 Nisqually earthquake, including the Mt. Baker and Mercer Island I-90 tunnels, Battery Street Tunnel, Third Avenue Bus Tunnel, and Burlington Northern Tunnel.

The bored tunnel would be built to current seismic standards, which are considerably more stringent than what was in place when the viaduct was built in the early 1950s. The bored tunnel design includes improving relatively soft, liquefiable soils found near the south tunnel portal. Emergency exits would be provided every 650 feet in the tunnel. Project engineers have studied current data on global warming and possible sea level rise and concluded that the seawall provides enough room to protect the tunnel from rising sea levels. The engineers also considered the possible threat of tsunamis during the design process.

Traffic through Seattle will be difficult during construction no matter what alternative is chosen. Mitigation measures will be in place as described in Chapter 8 of the Final EIS.

H-055-001

1 diverting all 110,000 cars through downtown or onto
2 I-5 effectively, so I think we need to have more mass
3 transit in place before we even consider shutting
4 down the viaduct temporarily, and I think that we
5 should possibly shut the viaduct down for a week or
6 so and see what happens.

7 (Public comments concluded.)
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