



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.