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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.

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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.

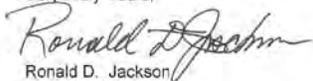
The lead agencies will continue to coordinate with BNSF on the Alaskan Way Viaduct Replacement Project construction as needed.

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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
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Northwest Division