



August 11, 2008

Angela Freudenstein
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Holgate to King Street Viaduct Replacement Project
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Dear Ms. Freudenstein:

Thank you for the opportunity to submit comments on the Environmental Assessment and Draft Section 4(f) Evaluation of the Holgate to King Street Viaduct Replacement Project. In addition to the work on mainline SR-99, the Port appreciates the project team's efforts to improve access between the Port's Terminal 46 and the North Seattle International Gateway (SIG) Rail Yard. The current design addresses many concerns the Port had with previous design alternatives. We applaud the progress made since the project's inception.

That being said, on a project of this magnitude it is not surprising that there are a number of outstanding issues whose resolution is critical to the Port. They are outlined below:

Completed Project

B-001-001 | The functionality of the S Atlantic Street/Alaskan Way/Colorado Avenue intersection must be improved.

The Port of Seattle appreciates the efforts of the project team to design a surface street system that supports freight mobility as well as general purpose traffic needs in the vicinity of our Terminal 46 (T-46). The proposed U-shaped under-crossing (U-tube), which will allow vehicular traffic to bypass train blockages on the BNSF lead tracks, is a marked improvement over current conditions. However, as noted in the EA *Transportation Discipline Report*,

"The new under-crossing would result in a complex set of intersections at the convergence of E Marginal Way S, Terminal 46 (T-46), Alaskan Way S, Colorado Avenue S, and S Atlantic Street. Especially long traffic signal cycle lengths would be needed to accommodate all movements at this location. As a result, average vehicle delays at this location are expected to be relatively high."¹

¹ SR 99: Alaskan Way Viaduct & Seawall Replacement Program . Holgate Street to S. King Street Viaduct Replacement EA, *Transportation Discipline Report*, June 2008, Page 5, 1st Paragraph.

B-001-001

The project team has updated the design to relocate the proposed southbound Alaskan Way S. connection to S. Atlantic Street farther to the east. This removes the fifth leg from the S. Atlantic Street/Colorado Avenue S./undercrossing intersection. For additional information, refer to the revised Section 5.1 of Appendix F, Transportation Discipline Report, in Attachment 1, Errata to the EA and Discipline Reports.

B-001-001 The delays projected for trucks supporting the Port's business are unacceptable to the Port. We urge WSDOT to reevaluate the current design to reduce the delay at this complex junction. There is a need to improve the efficiency of freight movements between T-46 and the North SIG Yard, which is accessed off of Colorado Avenue S. One potential change would be to relocate the proposed southbound S Alaskan Way connection that is now proposed to be a fifth leg of the intersection with S Atlantic Street and Colorado Avenue. That southbound connection consumes a very large portion of the signal time, and no other movements at the intersection can occur simultaneously. Relocating that connection to the East Frontage Road would reduce the signal cycle lengths as well as the conflicts with other movements at the intersection. We request that WSDOT evaluate this potential change in the project design. If it provides the needed improvement, and is acceptable to the project partners, the Port would support making appropriate adjustments to the design to be included in the FONSI for the project.

Construction Mitigation

B-001-002 **Interim improvements at the Alaskan Way S/S Atlantic Street/Colorado Avenue S intersection will be essential to maintain the functionality of T-46 during construction.**

The *Transportation Discipline Report* notes that:

"Given the closure of S Royal Brougham Way, maintaining access on S Atlantic Street is of critical importance.²"

We couldn't agree more. It also states that:

"This roadway would remain open throughout the construction period. A minimum of four lanes would be provided east of Colorado Avenue S, with two or more lanes connecting to E Marginal Way S."

As indicated above, the functionality of the complex set of intersections at the convergence of E Marginal Way S, T-46, Alaskan Way S, Colorado Avenue S, and S Atlantic Street is of critical importance to the Port. Although not noted in the text, the existing stop sign control and off-set intersection where S Atlantic Street and T-46 join Alaskan Way S has very little resiliency and experiences sporadic congestion today. Further lane constraints could exacerbate this congestion problem. We would support any measures that advance the re-alignment of this intersection to its final configuration and installing a traffic signal (permanent or temporary) to control the intersection. At a minimum, this should occur before Royal Brougham Way S is closed between 1st Avenue S and Alaskan Way S, likely increasing the amount of traffic Atlantic will experience. During the early stages of construction, when capacity is reduced, and before the realignment of the intersection and implementation of a signal, active traffic management may be necessary during busy times of the day to facilitate the movement of freight and general purpose traffic.

² SR 99: Alaskan Way Viaduct & Seawall Replacement Program . Holgate Street to S. King Street Viaduct Replacement EA, *Transportation Discipline Report*, June 2008, Page 127, Paragraph 5.

B-001-002

The project team has had ongoing discussion with the Port of Seattle to discuss alternatives. WSDOT plans to prioritize the realignment of the Terminal 46 driveway early in construction. Furthermore, the realignment of S. Atlantic Street will also be prioritized, although it would occur after the tail track is relocated in Stage 1. Active traffic management will be provided wherever warranted. The project team will continue to look for ways to implement the realignment of S. Atlantic Street prior to S. Royal Brougham Way being closed and/or installing temporary signals as early as possible.

B-001-003 Implementation of transit enhancements and other travel demand management tools during construction should avoid diverting general purpose traffic to the East Marginal Way and lower Spokane Street Corridors.

The EA lists several transit enhancements that WSDOT, SDOT, and King County Metro could consider during construction phases when capacity on SR 99 is limited. The Port of Seattle would be concerned about any actions that could divert general-purpose traffic to the E Marginal Way S corridor adjacent to T-25, T-30, and T-46, or to surface Spokane Street on Harbor Island and across the E Duwamish Waterway. For example, one of the potential options is to convert the eastbound Spokane Street Viaduct exit ramp to First Avenue S from general-purpose to transit and HOV only³. Since this ramp serves traffic from West Seattle, some of the general-purpose traffic could divert to the surface route from West Seattle, which includes Surface Spokane Street across Harbor Island and E Marginal Way S (north of Spokane St.). The potential diversion effects of these changes, and their impact on freight mobility should be considered before they are enacted. Cargo and trucks generally do not have the option to use alternative modes or routes. The freight mobility functionality of major truck streets like Surface Spokane and E Marginal Way must be protected. To achieve this goal, it may be necessary to actively discourage general purpose traffic from using these routes, especially during commuter peaks. The traffic mitigation plan for the project should address this issue.

B-001-004 Coordinating construction among projects and stakeholders will be essential in minimizing and mitigating the cumulative impacts of multiple simultaneous construction projects, including the Holgate to King St Viaduct Replacement Project.

The Port of Seattle supports programs to coordinate construction activities among projects with the potential for cumulative traffic impacts with affected stakeholders. The EA lists a potential *Downtown Transportation Operations Committee* for this effort⁴. However, many downtown stakeholders do not understand the needs of the industrial area and are bound to focus their interest on impacts further north. Furthermore, WSDOT has already identified a SR 519 *Maintenance of Traffic (MOT) Task Force* that includes interested stakeholders in the South-end of the Seattle, including Safeco and Qwest Field. In addition, many of the projects in the Duwamish, such as the Spokane St Viaduct, and the bridge repairs on the E Duwamish Waterway and E Marginal Way at Horton, have the potential to generate cumulative impacts with this project. A stakeholder process that focuses on the Duwamish would be preferable to one that, as its title suggests is focused on downtown issues. We would encourage you to coordinate the SR 519 and Viaduct South End committee memberships and meeting schedules to address this project's, and other Duwamish area construction coordination needs, rather than working with a much larger *Downtown Transportation Operations Committee*. We would also request that the terminal operator at T-46 (Total Terminals, Inc.) be included in any project or Duwamish committee.

³ EA p. 92, TDR p.145.

⁴ Page 128 of the EA.

B-001-003

At this time, construction staging and phasing of the project is under development. Various project elements have recently changed, which resulted in changes to the potential construction staging and phasing plans.

WSDOT is committed to working closely with the Port of Seattle as they refine the current construction staging plan. Thorough planning will lessen the impacts of construction on traffic, parking, access, and mobility in the project area and surrounding neighborhoods. By understanding access and mobility needs in the project area, including the concerns raised by this comment, WSDOT will be able to develop a construction approach that avoids and minimizes temporary disruptions. These specific needs will be incorporated into the staging plan where possible and advisable to help ensure that traffic flows smoothly during construction. WSDOT will maintain communication during construction to monitor the effectiveness of the staging plan and to make reasonable adjustments where necessary.

B-001-004

The S. Holgate Street to S. King Street Viaduct Replacement Project will coordinate with the Port, T-46 operators, sports facilities, local businesses, and other interested stakeholders who are focused on traffic issues in the area south of downtown Seattle.

B-001-005 Construction mitigation efforts need to ensure continuous access to the administrative offices and longshore parking for T-46 at S King St.

The entrance at S King St serves the administrative offices, and labor parking for the entire terminal. It is also one of two required emergency access points to the terminal. The new tail track to be constructed as part of the Holgate to King Street Viaduct Replacement Project will eliminate one of the driveways to the administrative building and longshore parking area for T-46 in the vicinity of King Street South-bound Alaskan Way may need to be relocated to the east frontage road. The EA is silent about how access to these facilities, as well as the second emergency access point for the terminal itself, will be maintained during construction. We understand that this is in part because the intersection at King Street and S Alaskan Way will be revised as part of the Central Waterfront project. However, since this project will reduce access, we request that the project team reference the need for adequate access at S King Street throughout all stages of Viaduct replacement.

Potential Technical Corrections

In addition to these substantive issues, we would like to point out a number of technical details for your consideration:

- B-001-006** • The EA states that high truck volumes are the main reason for back ups of north-to-west-bound truck traffic on Colorado south of Atlantic (p. 47 in the EA, and p. 86 of the TDR). However, it appears that another contributing factor to the lack of functionality of the set of intersections is the signal time required to accommodate south-bound Alaskan Way surface, which severely limits the amount of signal time available for other movements, including north-bound on Colorado. Truck queues on Colorado are a result, of that problem. Please review and, if appropriate, correct this statement in the FONSI.
- B-001-007** • Exhibit 3-11 on p. 53 of the EA includes a reference to POS land on Pier 36. This is Coast Guard property. We've attached a map of Port of Seattle properties to the email transmitting this letter for your reference.
• Similarly, Exhibit 4-24 on p. 86 of the TDR, includes incorrect references to Port properties. Again, please refer to our map for corrections.
- B-001-008** • On p. 94 the EA states: "During Stages 2 through 5, a temporary remote ferry holding area would be located west of Alaskan Way S and south of S King Street." This would place ferry holding on T-46. It is our understanding that the uplands of Terminal 48 are the planned location. They are located north of Jackson and south of Main Street.
- B-001-009** • On p. 124, Exhibit 4.2, the surface street work that is part of this project is shown as a component of the City's Bridging the Gap program, yet it does not receive any City funds. Why is it referenced as such?
• Similarly, Holgate is shown on the Bridging the Gap (Exhibit 4.2) map, yet it is not discussed in the Bridging the Gap paragraph on p. 127. Please reconcile.
- B-001-010** • E Marginal Way Grade Separation: P. 126 of the EA and p. 41 of the TDR contain different information on this project. We are now projecting completion of this project in late 2010 or early 2011.

B-001-005

We understand the need for adequate access to these facilities. The temporary construction impacts to the entrances will be coordinated with the Port and terminal operators. Access, including emergency access, will be maintained or an acceptable interim connection will be provided. The Port will be included in construction planning and have advance notice of any temporary changes to access during construction.

B-001-006

The Colorado Avenue S./S. Atlantic Street/undercrossing intersection has been redesigned since the EA was published. Alaskan Way S. has been removed from this intersection and relocated to match S. Atlantic Street in a location east of the location shown in the EA. The proposed signal timing at these intersections has been revised, resulting in less delay and better overall forecasted operations. Because of this change, the statement referred to in the comment will be modified. For additional information, refer to the revised Section 5.1 of the Transportation Discipline Report in Attachment 1, Errata to the EA and Discipline Reports.

High truck volumes are forecasted on Colorado Avenue S. because of the large volume of trucks traveling from the North SIG Railyard to Terminal 46. These truck volumes are expected during the Baseline condition. Under the Baseline condition, the intersection of Colorado Avenue S./S. Atlantic Street is expected to operate at LOS F. Under the Build condition, this intersection is expected to operate at LOS C in the 2030 PM Peak hour and LOS E in the 2030 AM peak hour due to the installation of a traffic signal. The project will improve operations for trucks traveling north of Colorado Avenue S.

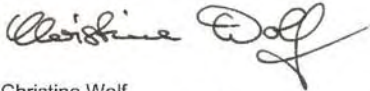
B-001-007

The sentence on page 53 of the EA and Exhibit 4-24 in the

- B-001-011** • On p. 42, Section 4.2.8, the TDR correctly states that, with completion of the improvements to the North SIG rail yard, the primary drayage route will be between T-46 and North SIG. However, trucks serving T-46 will also continue to access the Main SIG gate and potentially the UP ARGO Yard.

Thank you for the opportunity to comment. We look forward to continuing cooperation with the project team, and the completion of this important transportation project.

Sincerely,



Christine Wolf
Regional Transportation Program Planner
Seaport, Port of Seattle

Transportation Discipline Report have been corrected. Revisions are included in Attachment 1, Errata to the EA and Discipline Reports.

B-001-008

This sentence should have said "east" of Alaskan Way S. This is corrected in Attachment 1, Errata to the EA and Discipline Reports. Exhibit 4-11 of the EA also displays the location.

B-001-009

Exhibit 4-25 has been updated and is included in Attachment 1, Errata to the EA and Discipline Reports.

B-001-010

The date has been updated to "late 2010 or early 2011." Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

B-001-011

A sentence has been added to the referenced paragraph to note that trucks serving T-46 will also continue to access the main SIG gate and potentially the Union Pacific Railroad Argo Railyard. Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

