



August 11, 2008

Angela Freudenstein
Washington State Department of Transportation
999 Third Avenue, Suite 2424
Seattle, WA 98104

Re: SR 99 South Holgate Street to South King Street Viaduct Replacement Project - Environmental Assessment

Dear Ms. Freudenstein:

Thank you for the opportunity to comment on the Environmental Assessment (EA) for the SR 99 South Holgate Street to South King Street Viaduct Replacement Project.

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A-002-001

As acknowledged in the EA, the construction of this project could significantly affect King County Metro Transit's ability to provide reliable and satisfactory transit service between south-end communities and downtown Seattle by routes operating on SR 99, First Avenue South and Fourth Avenue South. Our foremost concern is to identify and make enhancements to priority transit pathways through the areas and detour routes where traffic will be directly or indirectly affected by project construction.

Our preference would be that SR 99 would function as the priority transit pathway for routes traveling between West Seattle and downtown Seattle during the course of project construction, and that transit enhancements be implemented to ensure reliable transit service. We appreciate the effort that has been made to evaluate potential transit enhancements and look forward to decisions regarding the specific priority transit pathway and enhancements that will be implemented. We need more detailed information to identify the fastest and most reliable transit detour routes during the morning peak, evening peak and midday periods for service between West Seattle, SR 99, and downtown Seattle. We also need more information to support rerouting decisions to ensure continued, reliable service for routes serving the Sodo area.

The potential construction-phase transit priority treatments under consideration include:

- Implementing directional queue bypass lanes for both northbound and southbound SR 99 ramps.
- Using the Seneca Street and Columbia Street viaduct ramps for transit and high occupancy vehicles (HOV), only during peak periods.
- Creating a transit-only northbound off-ramp to First Avenue South near Royal Brougham Way.
- Creating a transit-only lane on First Avenue South; and converting the Spokane Street viaduct eastbound ramp to transit- and HOV-use only.

A-002-001

King County has been an active participant in planning for construction of this project and has provided valuable information. WSDOT will continue to coordinate closely with King County as construction planning continues. Additional details on potential transit priority routes will be developed as part of this process.

WSDOT is committed to engaging key businesses, agencies, and activity centers (sports and event facilities and the port terminals) in the south end 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, 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.



- A-002-002** We would like the Washington State Department of Transportation (WSDOT) to complete the comparative analysis of transit travel times associated with each of these options as soon as possible. The consideration of comparative travel times should take into account the projected queuing of vehicles on the SR 99 mainline during construction.
- A-002-003** As noted in the EA, WSDOT and the Seattle Department of Transportation (SDOT) must enter into agreements and make policy changes before any of the transit priority treatments can be implemented. WSDOT should outline the expected timeline and mechanism for reaching agreements on the transit enhancements. Specific commitments must be made by mid-2009 to allow adequate time to implement whatever treatments are adopted.
- More information is needed regarding what transit priority treatments can be implemented on Fourth Avenue South between Spokane Street and Jackson Street. Fourth Avenue South currently functions as a high-volume bus pathway within the project area, carrying more than 100 coaches per peak hour. Both Fourth Avenue South and the Fourth Avenue South/Airport Way South intersection are already congested without the increased traffic that will be generated by diversions of vehicles from SR 99 during construction. Additional traffic on Fourth Avenue South, particularly the increases in volume projected for stage three of project construction that are shown in the EA's Exhibit 4-19, will seriously degrade transit service along Fourth Avenue South and through the intersection. The EA indicates that transit enhancements on Fourth Avenue South were considered but not found to be practical. Some sort of transit enhancements will be essential to maintain reasonable transit operations along Fourth Avenue South. Unreliable transit routes not only degrade service times but make it more difficult to predict wait times, frustrating riders. Providing reliable and efficient transit service will be especially important during the construction phases of the SR 99 Alaskan Way Viaduct Replacement Project, when unusually high levels of traffic congestion will be unavoidable.
- A-002-004** The combination of increased traffic volumes and drivers confused by traffic restrictions and re-routing options at some intersections could result in serious adverse impacts on transit operations within the intersections. This may be a particular problem at the intersection of Airport Way South and Fourth Avenue South. Traffic officers may be needed to prevent northbound traffic from blocking the intersection when vehicles on Airport Way South make left turns to Fourth Avenue South.
- A-002-005** The EA listed other planned construction projects in the Sodo area. The construction timelines of some of those projects overlap with the construction period for the SR 99 South Holgate to South King Street Project. Projects with overlapping timelines include the SR 519 Intermodal Access, Spokane Street widening, and Spokane Street loop ramp projects. These projects are also expected to have an impact on transit service on routes between West Seattle and downtown Seattle. What measures will be adopted to monitor overlapping project construction windows and ensure that cumulative traffic impacts are measured and mitigated?

A-002-002

Transit travel times will certainly be considered in developing the construction traffic management plan and will include queuing on the SR 99 mainline. This is one key element in the information that needs to be looked at as construction planning proceeds. WSDOT has already begun to coordinate closely with King County on construction planning as they move toward the development of the traffic management plan, which is expected to be finalized in May 2009.

A-002-003

As you are aware, WSDOT and SDOT have developed a series of agreements related to a variety of subjects pertaining to aspects of the Alaskan Way Viaduct and Seawall Replacement Program. An agreement on transit enhancements will be developed through established procedures and coordinated with other agreements needed for other aspects of the program.

At this time, construction staging and phasing of the project continues to be developed. Changes to the potential construction staging and phasing plans have occurred since the EA was published. (Please see Exhibits 4-8 through 4-12 in Attachment 1 of the FONSI). As the construction staging and phasing plans are developed in more detail, the project team will reconvene the working group that developed the initial transit enhancements list (WSDOT, King County Metro, and SDOT staff) to reevaluate potential enhancements, determine a timeline, and develop a means to reach agreement on project-related transit enhancements. An initial list of selection criteria is contained in Section 6.3.2 of Appendix F, Transportation Discipline Report.

A-002-004

The project team is committed to working with King County Metro to address concerns. The project team is still evaluating the construction staging and traffic detour scenarios that may use Airport Way S., Fourth

Our review staff has raised the following, more detailed project-impact concerns that should be addressed:

- A-002-006** • The activity of trucks involved in construction could have a significant impact on traffic. As truck routes and in-street staging areas are designated, the potential traffic impacts should be carefully considered. What measures will be adopted to mitigate the traffic impacts of construction-truck staging and routing? How should priority transit pathways be defined given the anticipated volume of truck trips and staging?
- A-002-007** • Construction-phase priority transit routes, including short-term detour pathways, must safely accommodate the weight of the transit coaches that will be using them. We note this concern in relation to the proposal to detour both north and southbound SR 99 traffic through the Washington Oregon Shipping Cooperative Association property for approximately eight months during the third stage of project construction.
- A-002-008** • Given the projected displacement of parking spaces within the project area during construction, it will be particularly important to provide in-street bus staging areas for special-event service, to accommodate the increased demand that special events generate. WSDOT and SDOT should coordinate to make sure such staging areas are provided.
- A-002-009** • Weekend and nighttime full closures of SR 99 should not be allowed during special events at Safeco or Qwest fields. During the intervals when SR 99 is closed, construction-related disruptions of traffic on the Alaskan Way surface street and First Avenue South should be kept to a minimum.
- A-002-010** • The EA's discussion of construction impacts on transit addresses impacts on transit routes that use the SR 99 corridor, but provides little or no analysis of the impact on the many other King County Metro and Community Transit routes that operate along Fourth Avenue South and First Avenue South.
- A-002-011** • Local freight traffic is likely to be diverted from some traditional local routes to Fourth Avenue South and the South Atlantic Street overpass, further congesting these roadways and affecting transit operations on them. There is already considerable freight traffic on Fourth Avenue South that originates from the rail yard at Lucille Street and Industrial Way and enters Fourth Avenue South and travels northbound to the South Atlantic Street overpass to get to the waterfront.
- A-002-012** • The proposed routing of northbound traffic on Alaskan Way South, north of the intersection of Alaskan Way South/South King Street, appears problematic because Alaskan Way narrows to a single lane north of the intersection to Madison Street and is frequently congested.

We recognize that the SR 99 South Holgate Street to South King Street Viaduct Replacement Project is critically important to overall mobility in the area surrounding the port, stadiums and

Avenue S., and other streets in the area. Further mitigation will be addressed in the traffic management plan.

A-002-005

The schedule for the SR 519 Intermodal Access Project Phase 2 has changed since the EA was issued. Construction on SR 519 is now scheduled to begin in the fall of 2008 and should be completed in mid-2010. The S. Holgate Street to S. King Street Viaduct Replacement Project's utility relocations are expected to begin in mid-2009 with Stage 1 starting around spring 2010, so there would be perhaps 3 to 4 months of overlap.

WSDOT is working with SDOT to develop a database tracking system that will identify locations affected by overlapping construction schedules in advance. Where concurrent construction is unavoidable, these locations will be monitored by direct observation, and adjustments will be made to lane restrictions, detours, or closures as needed to reduce delays.

A-002-006

No in-street staging areas are anticipated. Truck routing will be planned to avoid using transit pathways where possible. King County will be coordinated with as truck routes are developed.

A-002-007

Your concern regarding the weight of transit coaches is appropriate and will be taken into account as the detours are designed.

A-002-008

WSDOT is committed to engaging key businesses, agencies, and activity centers (sports and event facilities and the port terminals) in the south end as they refine the current construction staging plan. Thorough

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south Seattle. The King County Department of Transportation remains fully committed to working cooperatively with the Washington State Department of Transportation to complete this project while continuing to provide reliable transit service through the areas impacted by construction.

Thank you for coordinating with us on the development of the project and EA. We look forward to continued participation in the planning, design, construction, and construction mitigation of this important project.

Sincerely,



Harold S. Taniguchi
Director, King County Department of Transportation

cc: Ron Posthuma, Assistant Director, King County Department of Transportation (KCDOT)
Kevin Desmond, General Manager, Metro Transit Division (MTD), KCDOT
Jim Jacobson, Deputy General Manager, MTD, KCDOT
Judy Riley, Manager, Transit Design and Construction, MTD, KCDOT
Paul Leland, Environmental Planner, Transit Design and Construction, MTD, KCDOT

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, 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 traffic flows smoothly during construction.

WSDOT will maintain communication and coordination with King County Metro while planning for and during construction to ensure the effectiveness of the traffic and bus staging plan for events in the stadium area and will work to make reasonable adjustments where necessary.

A-002-009

Full closures of SR 99 on nights and weekends will be planned to avoid overlapping with large events at Safeco Field, Qwest Field, or the Qwest Field Event Center to the extent possible. Planning for full closures will include management of those facilities, City of Seattle, King County, and local business representatives. When full closures are needed, advance notice will be provided to the media and widely publicized. Detour routes will be designated and clearly signed.

A-002-010

Buses are expected to operate similarly to auto traffic on First Avenue S. and Fourth Avenue S., as reported in Section 6.2.1 Mobility of Appendix F, Transportation Discipline Report. Section 6.2.2 of Appendix F has been modified to include text summarizing potential impacts to bus operations on First and Fourth Avenues S. Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

A-002-011

WSDOT is committed to working closely with King County Metro 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, WSDOT will be able to develop a construction approach that avoids and minimizes temporary disruptions, including responses to address the effects of construction on transit. 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.

A-002-012

S. King Street marks the northern limits of this project. Existing congestion or queuing along northbound Alaskan Way, north of S. King Street, is not a result of this project. Additionally, a signal is proposed at the intersection of Alaskan Way S./S. King Street to help facilitate traffic flow. Analysis results indicate that with a signal, this intersection is expected to operate at LOS B or better under the 2030 Build Alternative.