

Attachment 5. Comments and Responses

During the EA comment period, 33 items were received. The comments and responses have been coded and are included in the following order:

Agency

- A-001 United States Department of the Interior
- A-002 King County Department of Transportation
- A-003 Seattle Department of Transportation
- A-004 Seattle Bicycle Advisory Board

Business or Organization

- B-001 Port of Seattle
- B-002 Seattle Marine Business Coalition
- B-003 Seattle Mariners
- B-004 Washington State Major League Baseball Stadium Public Facilities District

Public Hearing

- H-001 Gibbs, Ms.
- H-002 McIntosh, James
- H-003 Browning, Ms.
- H-004 Anonymous
- H-005 Shasteen, Bud
- H-006 Cesmat, Paul

Individual

- I-001 Anonymous
- I-002 Anonymous

I-003 Anonymous
I-004 Anonymous
I-005 Anonymous
I-006 Anonymous Citizen of West Seattle
I-007 Anonymous West Seattle Resident
I-008 Cooper, Maurice
I-009 Drake, Laura
I-010 Friedman, Harvey
I-011 Gray, Victor
I-012 Malmo, Jerry
I-013 Marshall, Ronald
I-014 McCarthy, Carol
I-015 Price, Dr. S.
I-016 Rerucha, Marjorie
I-017 Ross, Dennis
I-018 Simpson, Barbara
I-019 Skolnik, Art



United States Department of the Interior
 OFFICE OF THE SECRETARY
 Washington, DC 20240



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Ms. Angela Freudenstein
 Environmental Manager
 Washington State Department of Transportation
 999 Third Avenue, Suite 2424
 Seattle, WA 98104-4019
southviaductEA@wsdot.wa.gov

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Dear Ms. Freudenstein:

The Department of the Interior (Department) reviewed the Draft Environmental Assessment (DEA) and Draft Section 4(f) Evaluation for **State Route 99 South Holgate Street to South King Street Viaduct Replacement Project, Seattle; King County, Washington**, and offers the following comments.

Section 4(f) Evaluation Comments

A-001-001 The Department concurs that there is no prudent and feasible alternative to the use of Section 4(f) resources. We defer to the Washington State Department of Transportation (WSDOT), Federal Highway Administration (FHWA), Department of Archeology and Historic Preservation (DAHP), Advisory Council on Historic Preservation (ACHP), affected tribes, and the City of Seattle, which will develop the Memorandum of Agreement and requirements contained therein related to the viaduct. We also support completing documentation on the viaduct structure in accordance with Level 2 Historic American Engineering Record (HAER) standards.

The Department is particularly concerned with National Historic Landmarks (NHLs) in the project vicinity. It appears that the Pioneer Building, Pergola, and Totem Pole, located on 1st Avenue, Yesler Way, and Cherry Street, will not be adversely affected by the project since this NHL is located approximately four (4) blocks north of the project's northern boundary of South King Street. The Panama Hotel NHL is also located some distance from the viaduct.

A-001-001

The project is pleased to receive the Department's concurrence that there is no prudent or feasible alternative to the use of Section 4(f) resources. The project has developed a Memorandum of Agreement relating to the demolition of the Alaskan Way Viaduct. The Level 2 Historic American Engineering Record documentation relating to the viaduct structure will also be completed.

A-001-002 | Section 6(f) of the Land and Water Conservation Fund Act

There are not any 6(f) impacts from this project.

Section 7 of the Endangered Species Act (ESA)

The Department reviewed the submitted documentation and the ESA/Section 7 Letter of Concurrence issued jointly by the Fish and Wildlife Service (FWS) and National Marine Fisheries Service (NMFS) during June of 2008.

Content from the DEA is broadly consistent with earlier documentation (i.e., the Biological Assessment and supporting documentation).

There are no outstanding issues or matters involving the authority of the FWS.

Contact Information

For questions concerning Section 4(f), please contact Kelly Powell, Regional Environmental Coordinator, at (206) 220-4106, kelly_powell@nps.gov, or 168 South Jackson Street, 2nd Floor, Seattle, Washington, 98104-2853.

For questions concerning Section 6(f), please contact Heather Ramsay, Project Manager, at (206) 220-4123, heather_ramsay@nps.gov, or 909 First Avenue South, 5th Floor, Seattle, Washington, 98104-1060.

For questions concerning Section 7, please contact Ryan McReynolds, Transportation Liaison, at (360) 753-6047, ryan_mcreynolds@fws.gov, or Fish and Wildlife Service-WWFWO (Lacey), Consultation and Technical Assistance Division, 510 Desmond Drive Southeast, Suite 102, Lacey, Washington, 98503-1263.

Thank you for the opportunity to provide these comments.

Sincerely,



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

A-001-002

The project is pleased to receive both the Department's concurrence that there are no Section 6(f) impacts, and the ESA/Section 7 Letter of Concurrence in June 2008.



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

Angela Freudenstein
August 11, 2008
Page 4

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.



Seattle Department of Transportation

Gregory J. Nickels, Mayor

Grace Crunican, Director

August 7, 2008

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

Dear Ms. Freudenstein:

Thank you for the opportunity to review and comment on the SR-519 S. Holgate to S. King Street Viaduct Replacement Project Environmental Assessment (EA). This letter is in response to the NEPA EA issued on June 27, 2008 and the SEPA Notice of Adoption and Declaration of Non-Significance (DNS) issued on July 28, 2008.

The City of Seattle is an active participant with the Washington State Department of Transportation (WSDOT) and the Federal Highway Administration (FHWA) in this project and is supportive of the current proposal. We continue to work with WSDOT and FHWA in refining design and other elements while maintaining the project's budget and aggressive schedule.

This comment letter consists of two parts. The first focuses on general issues that have been identified in our review of the EA. The second presents comments by section of the EA. City staff are available to discuss the specifics of our comments at any time. We look forward to working with WSDOT and FHWA on resolution of any remaining issues and moving the project ahead.

A-003-001

A. Mitigation Commitments

The City is concerned about the lack of commitment in the EA to specific mitigation of adverse impacts. Appendix B "identifies measures that may be implemented to mitigate temporary construction effects or permanent long-term effects. Final mitigation commitments will be listed in the final environmental document." It is unclear from this language whether these measures are the ones likely to be committed to in the Finding of No Significant Impact (FONSI) or whether it is merely a list of measures under consideration. The City would prefer to be actively involved with WSDOT in mitigation discussions at this point, rather than finding itself in a situation of imposing additional mitigation requirements through the permitting process. The protection of City businesses



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A-003-001

The list of potential mitigation measures provided in Appendix B of the EA has been refined to create the list of mitigation commitments included in Attachment 4 of this FONSI. The refinements were made considering comments received on the EA, updates to the project description, requirements from Seattle for various permits, and a better understanding of the likely construction approach. Seattle staff have been and will continue to be involved in this process.

A-003-001 | and residents from adverse impacts of project construction activities is of paramount interest to the City.

A-003-002 | Page 61, 5th paragraph: WSDOT indicates they plan "to help neighborhoods by conducting community outreach and communication activities prior to the opening of the new facilities to educate and prepare people for changes in their community." However within this same paragraph it indicates that since the project would not create a loss of neighborhood cohesion, no mitigation measures are needed. The City believes that the community outreach and communications activities are a form of mitigation and should be performed as indicated in this document.

A-003-003 | Page 75, 2nd paragraph: Given that construction activities would vary greatly, that methods and sequencing may change and that duration may range from a few days to several months depending on the type of activity, the State should actively engage affected citizens, property owners and businesses to ensure that the impact to them is minimized.

B. Business Impacts and Mitigation

In addition to the general mitigation comment above, we have the following specific comments related to business impacts.

A-003-004 | Page 113, 2nd paragraph: The EA suggests very minimal efforts to minimize effects to businesses and employees. WSDOT should undertake a proactive strategy to ensure community and business owners' concerns are addressed at a higher level than indicated by this paragraph. The State should consider appointing a liaison between these groups and the WSDOT construction office. The State should also consider the establishment of a local group of businesses to review major detour routes prior to their implementation.

A-003-005 | Page 114, fifth paragraph and page 115, 1st paragraph: The document indicates that parking by construction workers would likely take 250 stalls per day and that this would likely impact event parking. While noting that on non-event days there seems to be a surplus of parking in this local area, the project should develop a strategy for construction worker parking which will not impact event parking. Construction worker parking should also not take place at the expense of parking for customers of local businesses.

A-003-002

WSDOT will conduct community outreach and communication activities in the neighborhoods surrounding the project. This includes communicating with businesses, residents, transit providers, and social service providers to help them adjust to the new ramps and changes made to the surface streets. Temporary signage will be provided to guide vehicles, transit, and pedestrians in the first several weeks or months after the opening of the new roadway facilities. No long-term mitigation measures have been identified because the neighborhood effects are likely to be short-term as people adjust to the changes.

A-003-003

WSDOT will be conducting community outreach and communication activities during construction. A community telephone line has been established so that the public can directly report problems related to construction activities, and in turn, the project team can address problems promptly.

A-003-004

Attachment 4 of the FONSI includes the mitigation commitment list. A program of public information and business assistance measures is being developed. Signage is one of the tools that will be used to help customers recognize that businesses are open. A liaison or community point of contact is being considered as suggested.

In addition, 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

A-003-006

Appendix B, Page 154: This section on Construction Mitigation - Economics needs additional detail, given the length of time and the level of impact generated by the project. WSDOT will need to implement measures to ensure the public information and business assistance measures developed are working and that adjustments can be made to ensure economic hardships are minimized.

Appendix B, Page 154, 1st paragraph: This paragraph includes a general statement that "...business assistance measures will be developed." Details of what is covered under this broad topic should be provided. Considerable detail on mitigation measures is provided under the Environmental Justice discussion, for instance. A similar level of detail should be provided under Economics to address business concerns. (Also see similar issue on page 120, 3rd paragraph, addressing impacts to local residents and businesses.)

A-003-007

C. Construction Impacts on Pedestrians and Bicyclists

There is a lack of discussion on how pedestrians and bicyclists will be affected during construction, especially in event conditions. (See pages 93 and 105.) Additional detail on detours, intersection traffic control, and other appropriate mitigation should be provided.

Page 93, 4th paragraph: Pedestrians and bicyclists must be accommodated through the construction site and not detoured to 1st Avenue. A safe and direct non-motorized route must be provided through the construction site throughout construction of the project.

Page 103, 2nd paragraph: Just as critical as motorized traffic, the project should also consider the needs of non-motorized traffic.

A-003-008

D. Maintenance of Traffic during Construction

The various stages of construction will have widely varying impacts on the local street network throughout the SODO and Downtown areas. The impacts will be further amplified by events at Safeco Field, Qwest Field and the Qwest Events Center. A greater discussion of these impacts and on mitigation measures should be included in the FONSI.

A traffic control plan will need to be developed in cooperation with SDOT to address construction scheduling, coordination with other projects in the area, stadium and event center activities, detour routing and the impacts of those

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-003-005

The use of any on-street parking spaces by construction workers would have to be coordinated and approved by the City. WSDOT is considering restricting construction workers from using parking spaces that could otherwise be used by event attendees or by customers of local businesses. Additional strategies for construction worker parking will be coordinated with the City and other stakeholders. Construction worker parking is also discussed in the Transportation section of Attachment 4, Mitigation Commitment List.

A-003-006

Mitigation for businesses relies on several activities described elsewhere in Appendix B. For example, see the mitigation described for land use (page 165 of the EA) and social resources (pages 171 and 172). Mitigation described for transportation, public services, and utilities will also reduce impacts on businesses. Together, these measures will minimize economic impacts. Business assistance will be developed in further detail as construction planning proceeds and will be developed collaboratively with businesses in the project vicinity. More cross-references have been added to the mitigation commitments provided in Attachment 4 of the FONSI.

A-003-007

As construction plans are refined, additional detail on bicyclist and pedestrian detours will be provided in the traffic management plan and coordinated with stakeholders. The construction plans have been

- A-003-008** | detours on local and through traffic, as well as on the local business and residential community.
- A-003-009** | Page 9, 1st paragraph: During stages 2, 3 and 4, SR-99 will have lane restrictions, causing increased traffic diversion and increased impact on the local street system. While WSDOT has developed a funding strategy for independent projects to be built in preparation for construction of the South End work, WSDOT should also consider how local street impacts will be managed. The EA indicates significant disruptions which may begin as far north as Battery Street Tunnel and as far south as Spokane Street. As this traffic filters through the retail, business, government, and SODO areas, impacts should be proactively managed in coordination with SDOT and strategies should be put in place to assist local businesses, citizens and residents.
- A-003-010** | Page 80-81: An analysis of impacts for the first eight months of the project during the relocation of utilities is missing from the document. Exhibit 4-6 refers to lane closures on various streets to relocate utilities during the first year of construction. WSDOT should clarify the following: What streets will be closed? Where will detours occur? What are the impacts of closures and detours on vehicle traffic, pedestrians, bicycles and transit?
- A-003-011** | Page 80, exhibit 4-6, and page 83, third paragraph: This exhibit indicates that during Stage 1, Alaskan Way would be detoured for three to six months via 1st Avenue. To ensure the greatest mobility for north and southbound traffic without having delay caused by crossing the rail track, the project should maintain a direct connection between East Marginal Way and Alaskan Way until the freight undercrossing (U-Tube) is functional.
- A-003-012** | Page 102, 5th paragraph: The enhancements and improvements referred to in this section do not specifically address the localized impacts on neighboring businesses. What specific mitigation is proposed for these localized impacts?

E. OTHER COMMENTS

- A-003-013** | EXECUTIVE SUMMARY
Page 4, 2nd paragraph: The document indicates that the Mountains to Sound Greenway Trail is planned when it is actually designated and exists and should be noted as such.

revised since the EA was issued. The revised plans do not require a detour to First Avenue S. and instead accommodate pedestrians and bicyclists on the west side of Alaskan Way. The term "nonmotorized" has been added to the referenced sentence on page 103. Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

A-003-008

Traffic impacts during construction are appropriately described in the EA and the Transportation Discipline Report for this project.

WSDOT is working with SDOT to develop a database tracking system that will identify locations affected by overlapping construction schedules in advance. Where the overlap cannot be avoided, these locations will be monitored by direct observation and adjustments will be made to lane restrictions, detours, or closures as needed to reduce delays.

WSDOT, in coordination with SDOT, is also working to develop a traffic management plan to reduce the impacts of construction on traffic, parking, access, and mobility in the project area. The traffic management plan is projected to be completed in May 2009.

A-003-009

WSDOT, the City of Seattle, and King County have identified the need for ongoing coordination of construction activities. 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

- A-003-014** | Page 6, 3rd paragraph: This paragraph states that "about 418 free long-term spaces would be removed." The text should include "on-street" as is seen in the table that follows. If possible, WSDOT should also indicate how many of the off-street spaces are long- versus short-term.
- A-003-015** | CHAPTER 3: PERMANENT EFFECTS & MITIGATION
Page 41, 3rd paragraph: The EA identifies an eight foot wide sidewalk that would provide access for pedestrians on the west side of the street for Alaskan Way and E Marginal Way. Those areas that are designated for use as a multi-use trail are required to be a minimum of ten feet of paved surface to be compliant with the WSDOT Design Manual Chapter 1020.
- A-003-016** | Page 50: The box definition needs to explain that most of the parking included in the inventory is paid parking, otherwise people might wonder why free parking or unrestricted parking is not included in the off-street definition. Refer to the definition in the transportation discipline report, page 40.
- A-003-017** | Page 56, line 14: change "local historic district" to Pioneer Square Preservation District
- A-003-018** | Page 61: The EA references several blocks of free parking around Utah and Occidental Avenues S. These spaces may be affected with the parking removals from the Spokane Street and 1st Avenue S project and therefore may not be available. (Comment also applies to page 100, Transportation Discipline Report.)
- A-003-019** | Page 62, paragraph 5: The EA should not imply that the homeless who car-camp would be directed to other long-term parking in the Duwamish industrial area. Rather, the project should work with social service providers and the homeless on appropriate solutions.
- A-003-020** | Page 66, 5th paragraph: On this page of cumulative effects, it should be noted that the example given would cause 30% to 40% of SR99 traffic to divert to the local street system, thereby causing disruption to the local system, increased congestion and potential economic impacts. The State should work with local businesses and the City to lessen this impact.
- A-003-021** | Page 67, 6th paragraph: In this bulleted list, it indicates that the SR519 Phase II project includes a greenway trail connection. Under the current proposal, no improvement of this trail segment is proposed by the Phase II project.

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. The Transportation section of Attachment 4 of this FONSI also identifies mitigation commitments.

A-003-010

Effects on pedestrian, bicycle, transit, and truck traffic are expected to be minor during utilities relocations in the first 8 months of project construction. Traffic will be detoured to S. Atlantic Street. Pedestrians and bicyclists may be detoured to the opposite side of the street where temporary detours are in place to maintain existing routes. The only street closure to occur will be on S. Royal Brougham Way for a period of 1 to 2 weeks. There will be no effects on transit. After the first 8 months of utilities relocations, S. Royal Brougham Way will be closed where it crosses under SR 99.

A-003-011

The project team is still evaluating the construction staging and traffic detour scenarios. The team is looking to maintain mobility to the greatest extent possible during construction. The detour proposed for Stage 1 is no longer on First Avenue S. as described in the EA. Traffic would instead remain on Alaskan Way S. with a temporary roadway connection to E. Marginal Way around the undercrossing construction.

A-003-012

The paragraph referred to is an introduction to the discussion of construction traffic mitigation. Localized impacts to businesses will be addressed by the traffic management plan described on page 103 of the EA. As described, this will be developed in coordination with several City of Seattle departments and other agencies and stakeholders. We

- A-003-022** | Page 68: The EA does not mention the 1st Ave S improvements project currently being undertaken by SDOT. Coordination with this project should be discussed in the FONSI.
- A-003-023** | CHAPTER 4: CONSTRUCTION EFFECTS & MITIGATION
Page 79, paragraph 2: The EA should define "temporary" in this instance.
- A-003-024** | Page 96, 4th paragraph: The EA should clarify the impacts of other traffic stages. There will be traffic restrictions, detours and delays throughout construction of this project and that they may differ by localized area.
- A-003-025** | Page 101, first partial paragraph: Operation during event conditions should also be discussed.
- A-003-026** | Page 104, exhibit 4-20: We suggest adding the Airport Way Bridge over the ARGO train Yard project. This project will allow trucks to travel north and south to bypass the construction disruption on SR99. SDOT has a project to rehabilitate this bridge that will correct the current load restrictions that are posted.
- A-003-027** | Pages 106-107: There is no discussion of sensitive noise receptors in the area and how the project would impact those specific receptors. This is essential information as part of any noise variance permit process.

Page 108, 3rd bullet: The EA should recognize that noise limits and time periods are regulated under the City of Seattle Noise Ordinance and the project will comply with the requirements of the ordinance.

Page 108, second paragraph: Other mitigation measures may be required by the City of Seattle and included in a noise variance.
- A-003-028** | Page 109: The impacts of vibration, especially on the Bemis Building and the Triangle Hotel, should be discussed in greater detail. In addition, there may be 'newer' buildings, which could be impacted by vibration. If there are impacts, measures to mitigate these impacts should be clearly described. In addition, the EA should clarify the probability of settlement in the area and its potential impacts on utilities and other facilities. (Also see Appendix B - Page 175 – Commitment to Monitoring.)

will also include local businesses to ensure they can participate in development of the traffic management plan.

A-003-013

The word "planned" has been deleted from this sentence. Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

A-003-014

The term "on-street" has been added to the sentence as requested. Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports. Off-street parking is paid parking and is not regulated by the City. The parking duration is determined by the amount paid.

A-003-015

The area referred to in the text (on page 41 of the EA) is south of S. Atlantic Street. There is no multi-use trail designation for the area south of S. Atlantic Street, so the WSDOT Design Manual Chapter 1020 would not technically apply. The 8-foot width for the sidewalk is the minimum to be provided for pedestrian use in this area, depending on the space available on the west side of the street.

A-003-016

The definition of off-street parking in the sidebar on page 50 is a general description. It indicates that this type of parking includes garages and lots where people pay to park and that most of the off-street parking is privately owned. Further details on parking can be found in the corresponding text on page 50 and in the Transportation Discipline Report.

- A-003-029** | Page 110, 2nd paragraph: "WSDOT could implement vibration monitoring ..." The State should explore other options, in addition to vibration monitoring.
- A-003-030** | Page 110: Mitigation measures for air quality are set in WSDOT and City standards specifications. Specific standards and specifications addressing best management practices should be used for mitigation.
- A-003-031** | Pages 115-116: Discussion of mitigation of accessibility to the Pioneer Square District is not sufficiently addressed in the document. The accessibility issue should be addressed in the Memorandum of Agreement (MOA) developed in consultation with State Historic Preservation Officer (SHPO).
- A-003-032** | Page 116, third paragraph: Impacts to the Bemis Building include noise, dust, access, economic viability: the only mitigation listed addresses the access issue. The EA should clarify if noise, air quality or economic mitigation is planned. (Also see appendix B - page 164)
- A-003-033** | Pages 118-119: Mitigation measures for impacts to archaeological resources should include an Inadvertent Discovery Plan. See WSDOT Standard Specifications 1-07.16(4) and City of Seattle Standard Specifications 1-07.5(6).
- A-003-034** | Page 119, 4th paragraph: The EA should clarify if access would still be provided at all times to the Jack Perry Memorial Viewpoint.
- A-003-035** | Page 120, 1st paragraph, last sentence: The EA should also include "...widely disseminated information on detours, ..."
- A-003-036** | Page 121, 3rd paragraph: Fire watches or stationing fire trucks in the vicinity would be required if the water supply and power must be turned off.
- A-003-037** | APPENDIX B: POTENTIAL MITIGATION MEASURES
Page 155, 1st bullet: Monitoring noise levels is more of an evaluation tool than a mitigation measure. The EA should clarify what will occur if noise level standards are exceeded.
- A-003-038** | Page 157, 1st paragraph: Rather than indicating that all effects can be mitigated, the EA should clarify that they will be mitigated.

A-003-017

The "Pioneer Square Preservation District" has been included as requested. Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

A-003-018

The phrase "although some of these spaces may be affected by parking removals from other projects that affect Spokane Street and First Avenue S. " has been added to the referenced sentence in the EA and on page 100 of the Transportation Discipline Report. Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

A-003-019

We will continue to work closely with social service providers to see that they are well informed about the project and can pass on accurate information to their clients. This will include loss of parking in areas used by some for car camping. The discussion in the EA is not meant to imply that car campers would be actively directed to other locations, simply that there are many other locations with unrestricted parking in the project vicinity.

A-003-020

As described in various sections of the EA and in Appendix B, WSDOT will work with the City and local businesses, as suggested in this comment, to reduce all types of impacts during construction.

A-003-021

The bullet describing the Mountains to Sound Greenway Pro-Parks Project has been revised. Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

- A-003-039** | Page 165, 1st bullet point: Is this point specific to the Bemis Building? Are there any impacts to Triangle Hotel? Given the few historic resources in the area, the EA should convert general statements into specific points for the one or two buildings of concern.
- A-003-040** | Page 166, 1st paragraph: The project may also qualify for a new "major public projects noise variance" if enacted by the City Council this summer. The decision on whether to use the new variance or a series of temporary variances will be up to WSDOT, in consultation with the City.
- A-003-041** | Page 167, "10 - Parks and Recreation": The EA should clarify when this evaluation takes place and the specific parks and recreational resources that would be examined.
- A-003-042** | Page 175, 1st paragraph: The EA should clarify the proposed mitigation if monitoring shows damage.
- A-003-043** | Page 176: This section of the EA indicates use of the Roadside Funding Matrix for WSDOT Capital Projects. Projects developed by the State must consider the context in which the project is developed and use context sensitive solutions and designs consistent with WSDOT Executive Order E 1028.00 and as such, those critical decisions which affect aesthetic, social, economic and environmental values, needs, constraints and opportunities should be discussed and coordinated with the City of Seattle.
- A-003-044** | APPENDIX F: TRANSPORTATION DISCIPLINE REPORT
Page 45, 1st partial paragraph and following bullet points: The information about the downtown truck traffic control zone should be corrected. For example, SDOT's website states that "Vehicles over 30 feet in length are restricted Monday through Saturday between the hours of 6:00 a.m. and 7:00 p.m. Special permission is required."

Over-legal loads are not permitted in the Downtown Traffic Control Zone between the hours of 6:00 a.m. and 7:00 p.m., Monday through Friday. Special permits must be obtained for any movement in this area. State permitted over-legal loads and vehicles must also obtain a special one-day permit for movement in the Downtown Traffic Control Zone. "
- A-003-045** | Page 54, 1st paragraph: The EA should provide a definition of what size trucks were inventoried and not inventoried. Note that the truck data excludes pick-up trucks and vans, which serve significant commercial vehicle trip functions, and which constitute

A-003-022

The improvements that are underway on First Avenue S. will be an existing condition when construction of the S. Holgate Street to S. King Street Viaduct Replacement Project begins. Therefore, it is not included in the cumulative effects section.

A-003-023

In this instance, "temporary" indicates that the proposed bridge structures will only be in place during the construction period. These structures are not permanent and would be removed after Stage 4 when the major SR 99 construction is completed.

A-003-024

A more detailed traffic detour plan, summarizing traffic scenarios and their expected impacts, will be developed as the project progresses. Attachment 4 of this FONSI also contains information about mitigation commitments for transportation.

A-003-025

We analyze traffic conditions for the typical, non-event AM and PM peak hours to capture impacts specifically related to the proposed project. Impacts caused by the project, not an event, are required to be mitigated. While event conditions typically result in more localized congested operations surrounding the event location, this congestion is not present on an average day and is therefore not included in the analysis.

The Project has analyzed construction traffic stages with effects on both SR 99 and the surface streets. The transportation analysis shows acceptable level of service for city arterials and major intersections in the area. This project will address stadium events that generate more than 20,000 people by limiting lane closures 2 hours before and 2 hours after

- A-003-045** | "freight mobility." There is no data for the smaller commercial truck activity since it is difficult to collect.
- A-003-046** | Page 125, 1st paragraph: The EA should add that because there is already a 6-9 am parking restriction in both directions, the new restriction would be only for the peak period.
- A-003-047** | Page 141, "Downtown Transportation Demand Management": The effort should also include downtown parking management and strategies to shift long-term monthly parkers to other modes opening up spaces for building owners / parking operators to provide as short-term. This effort should be concentrated in Pioneer Square, the central Waterfront and the downtown retail core area.

APPENDIX G: TECHNICAL MEMORANDA

- A-003-048** | **NOISE & VIBRATION**
Page 31, "Noise Insulation of Buildings": The text discusses the funding restrictions on this measure, not its usefulness in mitigating adverse impacts. Given the multiple sources of funds for this project, a restriction by a specific funding agency should not limit the range of mitigation measures at the project's disposal.
- A-003-049** | **PUBLIC SERVICES & UTILITIES**
Page 4, second bullet under "Utilities Effects": This point is not very clear. Is it referring to betterments?

Page 5, 1st bullet: Note that Seattle Public Utilities will coordinate all service interruptions for water customers.

Page 5, 2nd bullet: Note that this work will be performed by Seattle Public Utilities for existing water lines.

Page 5, 3rd bullet: Note that Seattle Public Utilities will perform repairs to the charged water lines.

Page 22: the EA should add the following text after line 32: "Utility relocation plans will be coordinated so that utilities relocated first will not interfere with subsequently relocated utilities. Final electrical duct bank design plans will provide for other utilities crossings. Duct bank construction will include provisions such as pipe sleeves set at

the event. Additional measures to address event traffic are being coordinated with both stadiums, Seattle Police Department, Port of Seattle, BNSF, and other key stakeholders to help with developing other mitigation measures. The project will continue to maintain communication with the stadiums and other key stakeholders during construction to monitor the effectiveness of the traffic management plan and to make reasonable adjustments where necessary.

A-003-026

The Argo project is part of Seattle's "Bridging the Gap" program as a bridge rehabilitation and repair project. There are currently load restrictions on the bridge, so it could provide another routing option for trucks if completed prior to construction of this project. However, the exhibit on page 104 shows projects receiving funding from the overall Alaskan Way Viaduct and Seawall Replacement Program. The Argo project is not receiving these funds and therefore is not included in the exhibit.

A-003-027

The second paragraph of question 6 on page 106 has been revised: "Construction noise would be bothersome to nearby sensitive noise receptors, such as residents and businesses." Additional information on noise receptors and impacts has been and will continue to be included in noise variance applications to the City of Seattle. Mitigation measures required by the temporary noise variances will be implemented.

Also under question 6 on page 108, we have revised the bullet and sentence. Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

A-003-028

We have added a sentence to the first paragraph on page 109 of the EA

A-003-049 | appropriate elevations or to accommodate other utility crossings including anticipated service lines to be installed in later contracts.”

WATER RESOURCES

A-003-050 | Page 1, lines 9-10: Stormwater runoff contributing to the Royal Brougham basin has a low flow route to the combined sewer via the Connecticut St. regulator. Also higher flows are stored in the 72-inch storm drain and routed to the Elliott Bay Interceptor (EBI) after high flow events recede. Stormwater flows are only released to the Puget Sound when the hydraulic grade line of the storm drain exceeds 11.58 ft. North American Vertical Datum (Navd)-88.

A-003-051 | Page 11, last sentence: The sentence should be changed to reflect that most runoff from the larger Lander Basin is discharged to the East Waterway as a result of the Lander Separation project. Most of the area between I-5 and E Marginal and S Holgate and S Lander Streets has been separated (about 75 or 80 acres).

A-003-052 | Page 12, lines 16-22: The flow routing of the Royal Brougham Sub-basin is incorrectly described here. The operation of the Royal Brougham flow control (Conn. St. regulator) directs stormwater to the EBI until the EBI hydraulic grade line meets a set point of 100.3 K.C. datum. The 72" storm drain is then allowed to fill and retain stormwater to a maximum hydraulic grade line of 108 KC datum (11.58 Navd-88). Stormwater is released to maintain the 108 hgl. as the storm event recedes and EBI capacity increases the retained stormwater is directed to the EBI. Because of storm variability, using an annual percentage is not valid and without further study the actual amount is not known. Please delete the 10 percent reference. The amount of stormwater discharged to the combined sewer from the low flow diversion is unknown. A range of 10-50 percent was used for the pollutant loading analysis, but the City never assumed that it was 10 percent. (Also see page 9, lines 7-13.)

A-003-053 | Page 17, 3rd paragraph: Change item (2) by inserting "and discharging to the combined sewer system" after "detaining it with detention BMPs."

A-003-054 | Page 18, exhibit 4-1: The text should clearly describe how the loading calculations were performed. Include information about Total Suspended Solids (TSS) and metals concentrations in the untreated runoff, pollutant removal assumptions for stormwater and wastewater treatment facilities, how much area will be separated and treated, the stormwater volumes discharged to both Elliott Bay and Puget Sound, and other

to describe the highest levels of vibration:

"Jackhammers and hoe rams would result in the highest levels of vibration. If used within 25 feet, the expected ground vibration levels would exceed the damage risk criterion for both buildings."

Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

Additional information on settlement and other utilities was covered in Appendix G, Noise and Vibration Technical Memorandum. The first paragraph on page 39 of the technical memorandum describes construction vibration effects:

"In general, the potential effect to underground and buried utilities from construction vibration would be less than the damage risk to buildings. The only construction activity proposed for this Project that would generate vibration levels that could damage utilities would be impact pile driving. Vibration from pile driving would not exceed the damage risk criterion for most buried utilities of 4.0 inches/second PPV at distances greater than 25 feet or the damage risk criterion of 0.5 inch/second PPV for older cast-iron water mains at distances greater than 100 feet. The damage risk to buried utilities less than 25 feet and older cast-iron water mains less than 100 feet from impact pile driving locations should be further evaluated during final design."

A-003-029

If vibration levels exceed the damage risk criteria, WSDOT would use an alternative method of construction.

A-003-030

Attachment 4 of this FONSI lists the mitigation commitments for this project. Air quality BMPs will follow the current regulations and

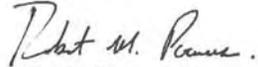
A-003-054 | assumptions used in the analyses. Simply summarizing the results does not provide the reader enough information to evaluate.

A-003-055 | Page 18, section 4.2.2: Are wet vaults the primary Best Management Practices being considered? Recommend inserting Stormfilter vaults rather than simple wet vaults as the example and then referring to Section 4.2.1.

A-003-056 | APPENDIX H: DRAFT MEMORANDUM OF AGREEMENT (SECTION 106)
The City will be commenting on the Draft Section 106 as a part to the MOA, rather than through the Environmental Assessment process.

Again, thank you for the opportunity to comment on this Environmental Assessment. The City remains supportive of this project and will continue to work with WSDOT, FHWA, other project participants and the affected neighborhoods and stakeholders to implement this project.

Sincerely,



Robert M. Powers, P.E.
Deputy Director, Seattle Department of Transportation

Cc: Wayne Wentz, P.E., SDOT
Michael Johnson, P.E., SDOT
Bob Chandler, SDOT

guidelines developed by the U.S. Environmental Protection Agency, FHWA, WSDOT, the Washington State Department of Ecology, and the Puget Sound Regional Council.

A-003-031

Mitigation for intermittent periods during construction when the southwest portion of Pioneer Square may be less accessible due to increased traffic, changes in parking, etc., is described in the Mitigation Commitment List in Attachment 4. The measures in the Memorandum of Agreement specifically pertain to the Bemis Building, Alaskan Way Viaduct, Battery Street Tunnel, and archaeological resources.

A-003-032

Mitigation measures for access, noise, and dust impacts to the Bemis Building and the Triangle Hotel, as well as for other (non-historic) buildings near the construction area, are described in the Historic Resources, Noise, and Air Quality mitigation commitments in Attachment 4 (which was previously Appendix B in the EA).

Please refer also to the Memorandum of Agreement for specific measures with regard to the Bemis Building.

A-003-033

As discussed in Attachment 4, Mitigation Commitment List, under Archaeological Resources, the Memorandum of Agreement includes mitigation measures. An Unanticipated Discovery Plan will be developed prior to construction.

A-003-034

Access to Pier 36 and the Jack Perry Memorial Viewpoint will be maintained during construction. There will be lane restrictions and minor

detours on E. Marginal Way and Alaskan Way during construction, which may cause the route to be slightly more circuitous.

A-003-035

The sentence has been revised to indicate that the public will be informed of detour routes. Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

A-003-036

Providing fire watches, or stationing fire trucks in the vicinity, in the event that the water supply or power must be turned off is included as part of the mitigation commitment list in Attachment 4 of the FONSI.

A-003-037

Noise level monitoring during construction will be necessary to accomplish some of the noise mitigation measures described on pages 166 and 167 of the EA.

A-003-038

No revision needed; the mitigation commitments included in Attachment 4 and this FONSI demonstrate that these effects will be mitigated.

A-003-039

In the Mitigation Commitments List found in Attachment 4, the Triangle Hotel is one of the historic buildings considered in the vibration, settlement management, and monitoring plan that will be developed to determine whether historic buildings may be at risk. The plan will also identify other buildings at risk, so that they can be protected from damage due to vibration or subsidence during construction activities that may cause these types of damage.

A-003-040

If the new "major public projects noise variance" is enacted, WSDOT will coordinate with the City of Seattle to determine whether the new variance is appropriate for this project.

A-003-041

The text has been revised and no longer uses the term "evaluated." The affected parks and recreational resources (the Jack Perry Memorial Viewpoint, Waterfront Bicycle/Pedestrian Facility, and Mountains to Sound Greenway Trail) are now listed. The Mitigation Commitment List is included as Attachment 4 to this FONSI.

A-003-042

The level of information in the EA is appropriate. With monitoring in place, no damage is anticipated to occur from construction vibration. WSDOT cannot speculate what damage might occur with monitoring in place or determine appropriate mitigation measures if damage were to occur because this information could change depending on the type and extent of damage.

A-003-043

WSDOT understands its responsibility to consider context-sensitive design solutions and has complied with its Executive Order E 1028.00, as demonstrated through the project's work with a nationally recognized urban design firm in coordination with SDOT staff as well as regular updates and presentations to the City's Design Commission.

A-003-044

The bullets referenced will be replaced with the provided text. Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

A-003-045

The introduction to this subsection includes the information referenced. Page 52 of Appendix F, Transportation Discipline Report, includes a description of the trucks that were inventoried. The text states that the truck volumes include "... single-unit trucks (not articulated), combination trucks (an articulated truck pulling one or two trailers), and tanker (liquid transport) trucks. Garbage trucks and concrete trucks were classified as single-unit trucks. The truck data excludes pickup trucks and vans, some of which serve commercial vehicle trip functions."

A-003-046

A sentence has been added to this paragraph to explain that, "There is currently an AM peak parking restriction in both directions along First Avenue S. north of S. King Street, so only the PM peak restriction would be new." Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

A-003-047

The parking strategies described in the comment are included in the Downtown Transportation Demand Management project. Coordination with the City will continue as the strategies are refined. The description of Downtown Transportation Demand Management has been revised to add a sentence noting that "... this effort would include downtown parking management and strategies to shift long-term monthly parkers to other modes, opening up spaces for building owners and parking operators to provide as short-term parking." Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

A-003-048

The text in the referenced paragraph does not discuss funding restrictions. Attachment 4 of this FONSI contains the list of mitigation commitments.

A-003-049

The second bullet under "Utilities Effects" on page 4 of the Public Services and Utilities Technical Memorandum is referring to the fact that some private utility owners will be relocating their own utilities.

With regard to the bullets on page 5 of the technical memorandum:

- WSDOT agrees that SPU will coordinate all service interruptions for water customers.
- Specialized tasks, such as connections to existing utility systems, will be performed by SPU for existing water lines.
- SPU will need to perform emergency repairs, if needed, due to inadvertent utility strikes during construction.

The following text has been added as the last sentence: "Utility relocation plans will be coordinated so that utilities relocated first will not interfere with subsequently relocated utilities. Final electrical duct bank design plans will provide for other utilities crossings." However, the last sentence suggested for an addition to the text, "Duct bank construction will include provisions such as pipe sleeves set at appropriate elevations, ..." will not be added to the text, as this is not the case.

Revisions to the text mentioned here can be found in Attachment 1, Errata to the EA and Discipline Reports.

A-003-050

No changes were made to the sentence: "Stormwater runoff from the project area currently discharges directly into Elliott Bay and the Duwamish River or to the combined sewer system." It is a general description appropriate for the summary of this technical memorandum.

A-003-051

The sentence has been deleted. The preceding sentence has been revised to include a reference to the East Waterway.

A-003-052

The reference to 10 percent has been deleted as requested and is noted in Attachment 1, Errata to the EA and Discipline Reports.

A-003-053

Revised as suggested. Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

A-003-054

Pollutant loads were calculated using WSDOT's BA Guidance (WSDOT 2007). The WSDOT guidance sets forth untreated and treated stormwater concentration values for TSS, dissolved copper, and dissolved zinc for use in the loading calculations. For the portion of the stormwater that is routed to West Point Wastewater Treatment Plant (King County 2001), concentrations of effluent from the plant were used to estimate pollutant removal.

References:

WSDOT. 2007. Website for Biological Assessment - BA Guidelines. <http://www.wsdot.wa.gov/Environment/Biology/BA/default.htm#writing>.

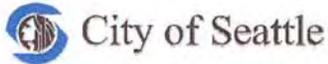
King County. 2001. Water quality effect assessment – Characterization of WRD Data: South and West Point Treatment Plants Influent/Secondary Treatment Effluent/Reclaimed Water. King County Department of Natural Resources. October 2001.

A-003-055

The sentence has been revised as suggested. Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

A-003-056

Thank you.



Seattle Bicycle Advisory Board

Sean Ardussi, chair
Ryan Dean, vice chair
Jeff Firkonja
Deborah Kaznitz
John Beaulaurier
Naomi Wilson
Dongho Chang
Brian Dougherty
Brian Leo
Sean Cryan
Rodney D. Rutherford
Evan Brown

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August 5, 2008

Ms. Angela Freudenstein,
WSDOT
999 Third Ave
Seattle, WA 98104

Subject: Environmental Assessment, Alaska Way Viaduct Replacement, Holgate to King St.

Dear Ms. Freudenstein,

The Seattle Bicycle Advisory Board (SBAB) has been briefed by members of the South Viaduct Replacement team and would like to make the following comments related to the environmental assessment.

The SBAB is encouraged to see plans developed that are inclusive of bicycle facilities and that will accommodate both on and off street bicyclists upon project completion. The Board would like to see the environmental assessment recognize the importance of this corridor as currently being the safest, and primary connection for bicyclists from the West Seattle, White Center, Arbor Heights and Burien areas to the downtown central business district. This corridor also serves as a key conduit to allow bicyclists access to other neighborhoods and communities in the region and should be reflected in your assessment accordingly.

On page 93, the impact on bicyclists during construction is outlined and a detour that follows that of other traffic directed towards 1st Ave South is suggested. The Board encourages an examination of the feasibility of construction detours specific to the unique needs of bicyclists as distinct from motorists. Such recommended detours may represent a greater obstacle to bicycle traffic and plans should take this into consideration in the interest of maximized safety and mobility. Meaningful communication during construction specific to bicyclists in the form of bicycle specific signs and email messages to the bicycling community will go a long way to ensure safety and predictability.

The environmental assessment discusses potential mitigation and construction impacts related to bicyclists, but does not recognize the magnitude of these impacts in any way. A recognition of the magnitude of impacts and the importance of this corridor to the mobility of Seattle's bicyclists would make for a more complete assessment.

Thank you;

Sean Ardussi
Chair, Seattle Bicycle Advisory Board

The Seattle Bicycle Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the city on matters related to bicycling, and the impact which actions by the city may have upon bicycling; and shall have the opportunity to contribute to all aspects of the city's planning processes insofar as they relate to bicycling.
- City Council
Resolution 23334

A-004-001

A-004-002

A-004-003

A-004-001

A paragraph has been added to Section 4.2.5 of Appendix F, Transportation Discipline Report. It states that "the SR 99/E. Marginal Way corridor in the project area is recognized as being the safest and primary connection for bicyclists from the West Seattle, White Center, Arbor Heights, and Burien areas to the downtown central business district. This corridor also serves as a key conduit to allow bicyclists access to other neighborhoods and communities in the region." Revisions to the text are included in Attachment 1, Errata to the EA and Discipline Reports.

A-004-002

Because of the limited space available for construction, it may not be possible to provide detour routes specific to bicycles during all stages of construction. Suggested bicycle routes will be identified, and the unique safety requirements of bicycles will be taken into account. Updated information on the project will be provided by newsletters and on the project's website throughout construction.

A-004-003

We understand the importance of this area as a bicycle route, as demonstrated by our planning for new and improved bicycle facilities and planning for bicycle use during construction.



August 11, 2008

Angela Freudenstein
Washington State Department of Transportation
Holgate to King Street Viaduct Replacement Project
999 Third Avenue, Suite 2424
Seattle, WA 98104

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www.portseattle.org

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.

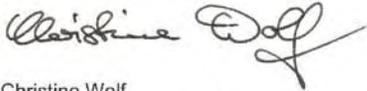
B-001-007

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.



Seattle Marine Business Coalition

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August 11, 2008

WSDOT
AWV/SR519

AUG 12 2008 *30*

Received
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Angela Freudenstein
WSDOT
999 Third Avenue, Suite 2424
Seattle, WA 98104
Email: southviaductEA@wsdot.wa.gov

Re: "SR 99: S. Holgate Street To S. King Street Viaduct Replacement Project";
Environmental Assessment, June 2008

Dear Ms. Freudenstein:

The Seattle Marine Business Coalition (SMBC) represents 240 member companies, all of whom are marine industrial land users, or depend on marine industrial land users for their business. As president of SMBC I appreciate the opportunity to comment on the NEPA environmental assessment (EA) for the southernmost segment of the Alaskan Way Viaduct project. As the representative of SMBC on the Viaduct Stakeholders' Advisory Committee I offer these comments as a cooperative member of the committee.

Our constituent companies are all clustered at the North and South ends of the Alaskan Way Viaduct in Seattle's only two industrial zoned neighborhoods: the Duwamish at the south end, and the Ballard Interbay Northern Manufacturing Industrial Center (BINMIC) at the north end. The maritime and industrial economy in Seattle is an almost uniquely post World War II phenomenon. This vibrant, stable and growing business sector grew—and now thrives—as a result of viaduct construction. This is different from other cities in which their industrial economies predated arterials built to serve them. Without the viaduct, or an effective

B-002-001

WSDOT will continue to work with the businesses in the project vicinity to minimize impacts during construction. When completed, the project will provide better connections for freight and improve safety. Economic conditions are discussed in Chapter 3 Question 3, Chapter 4 Question 9, and the Economics Technical Memorandum in Appendix G of the EA. Attachment 4 of this FONSI lists mitigation commitments.

B-002-002

The NEPA EA was adopted by WSDOT for SEPA on July 28, 2008 for a Determination of Non-Significance.

B-002-001 alternative, our maritime and industrial businesses—and their thousands of family wage jobs and their tax revenue—will be put at risk.

A 2004 study by Berk and Associates found that BINMIC and the Duwamish supported more than 78,000 family wage jobs in 2001 (the most recent year for which we have data). In the maritime sector alone, those jobs paid an average of \$70,000 per year according to another city-funded study by economist Paul Sommers. That amount represents an increase of 17% over 1995. According to the same study, Seattle's traditional industrial and maritime economy accounts for \$28.5 Billion in annual revenues.

We know how much it will harm these key sectors of Seattle's economy by removing the viaduct without an adequate replacement, including during construction. In his 2006 economic impact study, Jim Hebert found that the direct economic cost of the loss of the viaduct would be between \$2 billion and \$3 billion dollars annually for each year that the arterial is closed.

Though the state's "Moving Forward" initiative to immediately begin rebuilding the southern portion of the viaduct has the laudable goal of improving the ability of freight to move on and off SR 99, while maintaining existing capacity between BINMIC and the Duwamish, I have deep concerns that some important aspects of the project have not been adequately addressed. Because the EA raises more questions than it answers, my concerns are summarized as questions. SMBC would appreciate your response to our concerns before any decision is made based on the EA.

Where Is Required SEPA Review?

B-002-002 At the outset, we note that the Environmental Assessment (EA) is explicitly published to comply with the National Environmental Policy Act (NEPA), but comments are to be submitted to the state department of transportation. There is little reference in the EA to project compliance with the State Environmental Policy Act (SEPA). While WSDOT is identified as the SEPA lead agency (EA, Fact Sheet and p. 18), there is no indication of compliance with SEPA such as publication of an environmental checklist. The EA is intended to inform the Federal Highway Administration's decision whether or not to prepare a NEPA

B-002-002 EIS for the project. At the same time, WSDOT needs to publish this EA as a (or prepare a separate) SEPA checklist to inform its own threshold decision whether or not to prepare a SEPA EIS. (Under NEPA and SEPA, a single EIS may be prepared for both, as was done with the 2004 DEIS and 2006 SDEIS.) SMBC would appreciate knowing how the state and local agencies plan to comply with SEPA for their participation in this very large public works project.

Why Are the Agencies Segmenting Environmental Review of the Viaduct Project?

B-002-003 Most fundamentally, SMBC is concerned that this EA is for just "one of the six projects... as part of the larger Alaskan Way Viaduct and Seawall Replacement Program." EA, p. 2. By reviewing a small, portion of the larger project, the agencies are moving toward impermissibly segmented NEPA review. The purpose of an environmental assessment under NEPA (and a checklist and threshold determination under SEPA) is to determine if a full EIS is needed. In fact, seven years ago, the agencies determined that an EIS (NEPA and SEPA) would be prepared for the entire project down to Spokane Street. What has changed to invalidate that determination?

Our concern in this regard is highlighted by the agencies' stated intent to develop a proposal for the most difficult, central waterfront portion of the project before the end of the year. If any alternative for the central portion is selected other than a stacked, elevated structure configured similarly to the existing viaduct, it will require modification of the south portion in the Railroad Way area, if not further south. Some alternatives, such as a surface or buried roadway, would require considerable tearing out of the south portion newly built as proposed in the EA.

Why begin demolition of the southern portion before we know what we are doing along the central waterfront? Proceeding in such a fashion could waste considerable resources and possibly prejudice consideration of reasonable alternatives for the larger project.

Another major problem with this approach is the avoidance of consideration of cumulative impacts. A project as large as the viaduct has ramifications through a broad area of the City, in a number of impact areas. These impacts were explored to some extent in the DEIS, which is

B-002-003

As described on page 35 of the EA, the design of the S. Holgate Street to S. King Street Viaduct Replacement Project is not dependent on and does not constrain any of the feasible alternatives under discussion for the central waterfront portion of SR 99. Replacing this portion of the existing structure will improve public safety by reducing the area at risk during an earthquake and providing a facility with wider lanes and improved geometry. This project also makes important improvements to mobility of traffic on SR 99 traveling to and from south downtown Seattle and freight traffic traveling between Port of Seattle terminals and intermodal railyards. These benefits are all independent of any reasonable modifications to SR 99 along the central waterfront. North of S. Royal Brougham Way, where the mainline rises from at-grade to meet the existing structure, is a transitional section that may be modified depending on the final central waterfront configuration. This is a relatively small portion of the overall project. Construction of temporary facilities is common and necessary with transportation projects where providing continuous service is necessary to support the traveling public and local economies.

B-002-003 | now four years old. That process should not be abandoned at the risk of causing unintended and cumulative adverse impacts up and down the SR 99 corridor and beyond. The large scope of this project and its potential impacts is acknowledged by the agencies in the recent "Central Waterfront – 07/08" flyer.

Where Is Enforceable Mitigation for Identified Impacts?

B-002-004 | A fundamental purpose of NEPA (and SEPA) is to develop appropriate mitigation measures for identified impacts. If the project will have significant impacts that would otherwise require preparation of an EIS, they may, by means of required mitigation, reduce the impacts below the EIS threshold. If the agencies plan to use this method to avoid an EIS, they must use properly vetted and enforceable mitigation plans.

Similarly, once it has been determined that an EIS is required (as was done here, for the project as a whole), a key point of the process is to develop mitigation for identified impacts. SMBC is concerned that comprehensive and enforceable mitigation for impacts on its members will be lost in a segmented review process.

Why Don't the Agencies Complete the EIS for the Entire Project, with a Full Range of Alternatives?

B-002-005 | An EIS would require evaluation and comparison of a more complete range of alternatives. The agencies published a draft EIS (2004) and a supplemental draft EIS (2006), but never completed either process. Worse, while the range of alternatives was fairly broad in 2004, even including an alternative that approaches a full retrofit, it became very restrictive in the SDEIS. Now, we have an EA for the south portion that only considers the "build" and "no build" alternatives. EA, p. 2. The review process is going in the wrong direction; until reasonable alternatives have been evaluated and measured against the guiding principles and each other, they should not be excluded from consideration.

The Agencies Should Obtain an Unbiased Evaluation of the Retrofit Alternative

B-002-006 | In regard to the range of alternatives, we wish to remind the agencies that a fair and comprehensive evaluation of the "retrofit" alternative has yet to

B-002-004

Appendix B of the EA listed potential mitigation measures for this project for review and comment by interested parties. Attachment 4 of this FONSI lists mitigation commitments. These commitments will be used as the basis for permit conditions and requirements included in contract documents and hence are fully enforceable by WSDOT.

B-002-005

It is normal practice for an EA to address one build and one no-build alternative. Recognizing the history and range of issues involved here, the EA provides an entire chapter describing other alternatives that have been considered in this area and how the proposed project was developed. As described on page 35 of the EA, this project is independent of any feasible alternative under discussion for the central waterfront portion of SR 99.

B-002-006

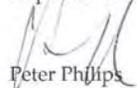
As described on pages 26 and 27 of the EA, a retrofit or rebuild would not provide a long-term cost-effective alternative. The south portion of the structure is seismically deficient, at the end of its design life, and does not meet current design standards. Studies supporting this conclusion are cited in the EA and available for review at the project office.

B-002-006

be completed. As you know, SMBC has advocated for a thorough evaluation of the alternative of "retrofitting" the existing structure in order to maintain current capacity, with minimal traffic volume and traffic pattern disruption, at the lowest possible cost to the taxpayer. We believe this option could meet the requirements of the guiding principles as well as any other alternative considered to date, and could be the most fiscally responsible if fairly evaluated.

A valid EIS for the Viaduct project must include consideration of all reasonable alternatives, including a retrofit. We disagree with conclusory statements that retrofitting is "neither technically or fiscally prudent." While we appreciate your commitment to hire Miyamoto International for additional work regarding the retrofit, we are concerned that you have prejudiced Miyamoto's ability to conduct a complete review by failing to commit sufficient resources. We urge you to engage Miyamoto and Associates to engage in a full and complete analysis of the spectrum of retrofit options available. Anything less than a complete study will not satisfy the needs of the stakeholder group to be properly informed, and for Washington State taxpayers to obtain the best return on their tax dollars. And the agencies would be failing to "look before you leap" as required by NEPA, SEPA, and common sense.

Thank you for the opportunity to comment. We look forward to your responses and continued dialogue.



Peter Phillips
President
Seattle Marine Business Coalition

cc:

Stephen Boch, P.E.
Federal Highway Administration
915 Second Avenue, Room 3142
Seattle, WA 98174

Alaskan Way Viaduct Stakeholder Advisory Committee



VIA MESSENGER

August 11, 2008

Angela Freudenstein
Washington State Department of Transportation
Holgate to King Street Viaduct Replacement Project
999 Third Avenue, Suite 2424
Seattle, Washington 98104

RE: Comments on the Environmental Assessment and Determination of
Nonsignificance for the SR99 S. Holgate to S. King Street Viaduct Replacement
Project

Dear Ms. Freudenstein:

B-003-001 The Mariners have significant concern about the accuracy and completeness of the Environmental Assessment. It fails to address impacts on the area's regional event facilities, Safeco Field and Qwest Field and Event Center. In our letter on the scope of the Environmental Assessment, dated October 12, 2007, we commented on the need for a more complete analysis of the cumulative impacts of the multiple projects that will be under concurrent construction. We asked for a complete analysis of the proposed mitigation measures and how they would perform, specifically during event-related traffic periods. At the time of the scoping process, the design of the proposed interchange at SR 99 and S. Atlantic Street was vastly different than the design currently under consideration, and we expressed concern and the need for better analysis of how the design would impact access to the regional event facilities. We do not believe that those concerns have been adequately addressed in the EA.

B-003-002 With the design of the project still undergoing substantial change there is reason to believe that the impacts of the project will also change both during construction and afterward. Completion of the environmental assessment process so far in advance of an accepted project design seems to strain the environmental review process and begs for dispute. While the needs of freight traffic appear to have been thoroughly addressed, the failure to adequately address the needs of the adjacent regional event facilities at Safeco Field, and Qwest Field and Event Center is puzzling. These facilities directly generate hundreds of millions of dollars in revenue, and draw approximately four million people into the area each year. Thousands of working people rely on jobs at the stadiums, at



P.O. BOX 4100 • SEATTLE, WA 98194 • 206.346.4000 • www.seattlemariners.com

B-003-001

We appreciate and understand your concern with this project and are committed to working with the Mariners as the project proceeds and throughout the construction process. The EA analyzes the proposed improvements in sufficient detail to determine whether, with avoidance, minimization, and mitigation, there will be significant adverse impacts. Our conclusion is that there will not be significant effects. The EA clearly states (see pages 103 and 172) that a detailed traffic management plan will be developed in coordination with the two sports venues, including the Mariners. Project staff have met with staff from the Mariners several times to discuss the project and keep your organization up to date. The EA provides the level of analysis appropriate for this stage of decision making and with this FONSI establishes the necessary commitments for the project to move ahead. We are committed and look forward to working with Mariners staff to develop a construction approach that meets everyone's needs.

B-003-002

Beyond the changes described in this FONSI, the design of the project is not expected to change in a manner that would substantially alter the conclusions stated in the EA. It should be noted that these changes improve project performance and reduce its impacts. When in operation, the proposed improvements will benefit patrons of the sports facilities and event center with better access and improved traffic flow. Construction impacts during special events (temporary increases over the already congested baseline conditions) are clearly identified in the EA and will be reduced through the traffic management plan that will be developed in coordination with the Mariners and managers of the other nearby facilities.

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

B-003-002 | businesses supplying the stadiums, or at businesses benefiting from their proximity to the stadiums, to earn a living. This must not be ignored. The failure of the environmental assessment process to give adequate consideration to the existence of stadium-related traffic, or to fully analyze stadium traffic and parking requirements, does a disservice not only to the public who benefit from the stadiums but also the freight interests who will suffer from a lack of thorough planning.

B-003-003 | The loss of parking is mentioned in the assessment as if being only a nominal, inconsequential issue. The loss of over 1200 spaces represents about eight percent of the parking inventory that has historically supported Safeco Field. While this may seem inconsequential, a thorough analysis would reveal that the additional losses due to other concurrent public and private projects will result in a cumulative impact that is much greater, and which will result in the displacement of many more vehicles than accounted for in the document. There is almost no discussion about the 14,000 cars that come into the area for baseball games, or the 20,000 cars that come in for football games, and how those vehicles will especially impact the PM peak commute period. There is very little accounting for the new soccer team events nor any of the major non-athletic events such as concerts, meetings, and trade shows, which routinely bring hundreds or thousands of vehicles into the area. There is a mis-characterization of the event facility parking inventory as "pay lot" parking which has been stated as being only 37% used. The parking inventory of the event facilities (Safeco Field Garage, Qwest Event Center Garage and North Lot), totals 4500 spaces. That inventory is not available to the general public before or during events and should be more appropriately included with more restricted private parking category, thereby reducing the amount of "unused" parking normally available to the general public by two-thirds, a considerable reduction in supply.

Failing to fully study these issues and design an adequate program of mitigation will not make them go away, and will contribute to a less-than-promised outcome for the public.

B-003-004 | Finally, the project must understand and accept that events at these regional event facilities are not "special events" but are regularly occurring activities at facilities specifically designed for, and permitted as, permanent, major, regional event facilities. As such the transportation and access needs of these facilities must be given adequate and equitable standing as given other business segments existing in this area.

Other Issues Needing Consideration:

B-003-005 | Page 59, needs a small technical correction to the second paragraph which refers to "views to the northeast" which should state "northwest".

B-003-006 | Page 60, the statement about the Jack Perry Waterfront access does not coincide with the drawing on page 54. In that drawing the Jack Perry Waterfront access point is moved substantially south. The current access gives access to the waters edge. There does not

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.

B-003-003

WSDOT, FHWA, and the City of Seattle do not have a standing policy for replacing off-street parking. The EA notes that the occupancy rate of 37 percent is during non-event days. The high vacancy rate indicates relatively little demand from the general public for the event parking facilities on non-event days. Even if these facilities are not available for general parking on event days, it would not change our conclusion. The project team recognizes that there would be a reduction in the parking supply during events and that currently parking can be difficult to find and/or expensive during events. Past experience has shown that market forces will likely prompt more off-street parking to be made available in the area. Overall, the incremental loss of parking due to this project is not expected to have a significant impact on future operations of the event facilities.

The project team looks forward to continued coordination with the Seattle Mariners, Seattle Seahawks, Washington State Major League Baseball Stadium Public Facilities District, and Washington State Public Stadium Authority on issues, including parking and event traffic.

B-003-004

While events at Safeco Field, Qwest Field, and the Qwest Field Event

- B-003-006** appear to be the same level of access at the new location – no ability to get to the water’s edge and far enough down the waterway to eliminate the view of Elliott Bay at the viewpoint. This is a significant change to what is supposed to be a public access and viewpoint.
- B-003-007** Page 61, the first paragraph states there would be no adverse impacts on recreational facilities by the project. This is disputed – the closure of access from Royal Brougham Way to Alaskan Way is significant to the functioning of Safeco Field. The sphere of influence of the regional event facilities cannot be confined to the physical premises of those facilities alone. In the case of Safeco Field, permitting was based upon studies of available parking within a 6000 foot distance to justify the stadium parking requirements. The project will eliminate between 1200 and 1600 of the currently available parking spaces, which have historically supported the ballpark parking need for 14,400 spaces (8-12% of the total needed). This constitutes a significant adverse impact on Safeco Field.
- B-003-008** Page 81, staging timeline comments and traffic reroutes and detours fail to acknowledge existing street closures before, during and after major events at Safeco and at Qwest for pedestrian safety. Planning for rerouting traffic onto Royal Brougham and Atlantic without taking into consideration the availability of those streets during major events, does not adequately address the problem.
- B-003-009** Page 111, the impacts on Safeco Field as a business and a large employer cannot be underestimated and must be included. The narrow perimeter of only “one block” established as the impacted zone is inaccurate. Safeco Field, as a regional event facility, impacts and is impacted by a vastly greater zone. During development of the ballpark that zone was defined by the City of Seattle as a 6000 foot radius. As such, the ballpark should be identified as an impacted business.
- B-003-010** Page 114, while the statement is made that event goers will be encouraged to use bus and rail to major events, it is evident that there is no understanding of what services are available or the restrictions on those services that make them unavailable for the majority of events at the regional event facilities. With the recent, ill-founded FTA ruling on “charter bus” services, the practice of supporting enhanced transit services to mitigate traffic impacts is no longer available and can no longer be suggested as a means of reducing congestion. The limit of the capacity of Metro service to handle event loads on its regular routes needs to be better understood. It also appears in the document that there is a lack of understanding of the limitations placed on the use of heavy rail as a form of transportation to major events, and a misunderstanding of the limited accessibility of the LINK light rail system due to the lack of parking near the LINK stations.
- B-003-011** Page 115, the Environmental Assessment erroneously characterizes events in Safeco Field and Qwest Field and Event Center as “special events”. These facilities are permanently permitted, full-time event locations no different than the Washington State

Center are fully permitted, they do not occur with the same frequency or at the same time as normal working hours. We use the term "special events" to indicate that these events and the resulting traffic flows do not follow the same patterns as the majority of typical workday activities.

B-003-005

In Attachment 1, Errata to the EA and Discipline Reports, the sentence has been revised to state "views to the northwest."

B-003-006

The text on page 60 in the EA was describing how southbound Alaskan Way would be reconfigured, changing how vehicles traveling in that direction would access Jack Perry Memorial Viewpoint. Access to the viewpoint near S. Massachusetts Street will not be affected. Southbound traffic will be able to turn right into Pier 36 as they do today. The existing turn pocket at S. Massachusetts Street would allow northbound traffic to turn left into Pier 36 to access the shoreline viewpoint. Since the EA was published, changes have been made to southbound Alaskan Way. The paragraph on page 60 has been revised. Text revisions are included in Attachment 1, Errata to the EA and Discipline Reports. Exhibit 3-1, the Proposed Build Alternative, has been updated and is also shown in Attachment 1.

B-003-007

With the improvements to S. Atlantic Street and the added frontage roads and ramps, closing S. Royal Brougham Way to Alaskan Way S. will have no effect on the functioning of Safeco Field. With regard to parking, the EA clearly describes reductions to parking in the area that will result from the project. There have been other changes in parking supply, both increases and decreases, since Safeco Field was permitted, and it is inevitable that there will be more changes in the future. Parking for major events at Safeco or Qwest Fields is and will be in high demand

- B-003-011** Convention and Trade Center. Major events occur at these facilities over 150 days each year, and concurrent multiple smaller events occur every day. The events that occur at these facilities every day are not part of the special event permitting process within the city. The Environmental Assessment must not characterize these facilities as anything other than permanent, major, regional event facilities and must recognize the access needs of these publicly owned facilities.
- B-003-012** Page 114, the Mariners will strongly oppose setting aside street parking for project construction workers, or the further reduction in available parking within the area of Safeco Field for use by project construction workers.
- B-003-013** Page 115, advance notice of utility disruptions, while admirable, would hardly suffice as mitigation for some businesses, especially restaurants, cold storage facilities or data processing and storage facilities. Provisions for alternate power sources, whether temporary feeds or generators for power disruptions, would be a vastly less costly solution than would be claims against the project for lost inventories or lost business.
- B-003-014** Page 121, the potential impacts on police and fire cannot be underestimated. Again, the Environmental Assessment badly understates the impacts of the project in the area near the stadiums during major events. It must be noted that police staffing for events at Safeco Field will only address traffic control needs comparable to what existed prior to the project.
- B-003-015** Page 125, the plan to divert traffic onto Royal Brougham at the end of Stage 1 appears to conflict with the anticipated SR519 Phase II construction timeline for Royal Brougham.
- B-003-016** Page 128, we would like more information about the proposed Downtown Transportation Operations Committee, who would be participating in the committee, the area covered, and the charter of the committee.
- B-003-017** Page 169, the intent of the "public service contact plan" is unclear as to whom it is referring to.
- B-003-018** Page 171, the public communications plan proposed in the Environmental Assessment appears to be relying on outdated methods of communication which rely on hardcopy flyers and rare public meetings that are time consuming to create or participate in, cumbersome for people to use, difficult to distribute, usually lacking in timeliness, hit-and-miss in getting to the right people, and costly. Speed and accuracy of information will be vastly more important to the public than would be glossy flyers or free cookies. There is no mention of email or other electronic methods of communication that can cost-effectively communicate with large numbers of people via "list serve" distribution. Not only is this method the quickest way to communicate but it also has fewer environmental impacts by not printing materials and not using fuel to deliver materials. Messaging must

whether or not the parking places affected by this project are removed. This effect is clearly described in the EA. Based on historical fact observed in this area and elsewhere, we expect that owners of other parking areas in the general vicinity will respond by making additional spaces available. The core question here is whether the presence or absence of the parking spaces affected by this project would cause an appreciable number of patrons to change their minds and not attend some event. We do not expect the change in parking to have any discernible effect on the functioning of these facilities or attendance at events, which is influenced much more by a sport's popularity and team's success in a given season. Therefore, we do not consider this a significant impact.

B-003-008

The construction staging and traffic detour scenarios will continue to evolve as designs are finalized, and the project team recognizes that event conditions are different than non-event conditions.

B-003-009

We recognize that Safeco Field is a regional event facility and is a large employer. As such, effects on Safeco Field are discussed throughout the EA. Replacing the viaduct will ultimately benefit the facility by providing a safer roadway and new northbound off-ramp and southbound on-ramp to SR 99 near S. King Street.

B-003-010

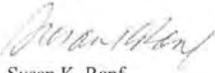
Information from transit agencies, the Mariners' website, and the Safeco Field Transportation Management Program were used to help inform the discussion of transportation options during events. The effects of the FTA ruling are assumed to be resolved before project construction starts since numerous major events will occur at the stadiums before

Angela Freudenstein
Washington State Department of Transportation
August 11, 2008
Page 5

- B-003-018** | be succinct and to the point and avoid the long-standing tendency to include too much political boilerplate which dilutes the message and irritates the recipient. If public meetings are held they need to have meaningful content that cannot/will not be more completely provided by email distributions. Hardcopy glossy flyers should be used sparingly, if at all, once the project commences.
- B-003-019** | Page 173, with a year or more backlog in the production of transit vehicles by the manufacturers, does Metro actually have the capacity to add coaches beyond what they have recently received?
- B-003-020** | Page 173, the reference to "South End Transportation Demand Management" needs to be further studied to ensure the design of a TDM plan would not adversely impact access to the stadiums.
- B-003-021** | Page 174, the Mariners oppose conversion of general purpose lanes on First Avenue to transit only lanes north of Holgate as that would severely impact access to the ballpark and would result in even greater traffic backups. The conversion of the First Avenue off ramp from Spokane Street from general purpose to transit only would create massive difficulty for people from West Seattle trying to get to the event facilities and would be strongly opposed by the Mariners.

Thank you for the opportunity to comment. Should you wish to further discuss our comments we would be happy to set up a meeting. I can be contacted at 206-346-4236.

Sincerely,



Susan K. Ranf
Director of Transportation

cc: Bart Waldman, Executive Vice President and General Counsel, Seattle Mariners
Tom Backer, Legal Counsel, Public Facilities District
Martha Fuller, Senior Vice President and CFO/VSE, Seahawks, FGI & Sounders FC

then. The project team looks forward to future coordination with the Mariners.

B-003-011

As noted above in response to B-003-009, some distinguishing terminology is needed to indicate that the schedule for events at these facilities does not follow the same pattern as normal working hours and daily traffic flow patterns.

B-003-012

The use of any on-street parking spaces by construction workers would have to be coordinated and approved by the City. WSDOT is considering restricting construction workers from using parking spaces that could otherwise be used by event attendees or by customers of local businesses. Additional strategies for construction worker parking will be coordinated with local stakeholders.

B-003-013

Other mitigation measures for potential planned utility disruptions are listed in the Public Services and Utilities section of Attachment 4 - Mitigation Commitment List. These include the development of a consolidated utility relocation plan for both short-term and long-term relocations, including a detailed description of service disruptions. Along with this plan, WSDOT will prepare a coordinated utility communication strategy to coordinate services to customers and to minimize or avoid temporary disconnections each time a utility is relocated. Limits on shutdowns would be documented in the construction plan as specified by the utility provider to minimize long-term effects. Utility providers will notify customers prior to planned service disruptions.

B-003-014

It is noted in the EA (p. 121) that "police and fire services will be affected

by traffic delays and detours during construction," and that "construction could require additional police support services to direct and control traffic and pedestrian movements and could result in increased response times to certain destinations." It is understood that the police staffing at stadium events is there to ensure adequate traffic control at each event, as noted in the comment, and would not be there to provide additional support during construction activities.

The EA goes on to acknowledge that construction activities and associated detour routes could result in increased response times at certain times during construction. A traffic management plan will be developed prior to the commencement of construction activities for implementation throughout construction. The traffic management plan will be developed in consultation and coordination with the Seattle Police Department, the Seattle Fire Department, the Port of Seattle, the stadium and event center facilities (including the Seattle Mariners), and King County Metro Transit.

B-003-015

Traffic would have been detoured to a short section of S. Royal Brougham Way that was not concurrently affected by SR 519 project construction. However, detour routes during construction have been revised since the EA was issued. Traffic is no longer anticipated to be detoured to S. Royal Brougham Way. Instead, Alaskan Way S. is planned to be widened to accommodate detour traffic on the west side of the construction zone.

B-003-016

At this time, there is no new information about the broader Downtown Transportation Operations Committee that is being considered by WSDOT, the City of Seattle, and King County.

B-003-017

This paragraph (EA p. 169, 3rd paragraph) referred to a potential mitigation measure for public service emergency access, and has been revised in Attachment 1, Errata to the EA and Discipline Reports, to clarify both the intent of the "public service contact plan," and to whom the notification would be made.

This statement refers to an unanticipated event occurring during construction activities that may unexpectedly restrict emergency service access to a segment of roadway, or other type of incident that may require a route modification for emergency services. If such an event occurs, two contacts for each public service provider agency (e.g., Seattle Police, Seattle Fire, or EMT services) would be available (per the public service contact plan) to enable WSDOT to alert the providers to the special circumstances. Two contacts would be provided, so if one contact could not be reached, a second contact person would be available to set contingency routes or modifications in routes in effect for the service providers, so that emergency services would not be compromised.

B-003-018

The project uses an electronic mailing list and regularly emails project newsletters and notifications. The project's communications team will continue to use email and the project website as a method to disseminate information quickly. Important project information is updated frequently, and regular monthly email updates can all be found on the web at:

<http://www.wsdot.wa.gov/Projects/Viaduct/emailupdate.htm>.

B-003-019

We have coordinated closely with King County, and they have not indicated any capacity problems in this regard.

B-003-020

TDM project descriptions for the south end continue to be developed and are anticipated to be coordinated with input from the Mariners.

B-003-021

The project team is committed to coordinating with the Mariners and evaluating the construction staging, traffic detour scenarios, and associated mitigation as project designs are finalized. Effects on stadium access will be considered in the evaluation.

In addition, 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.



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August 11, 2008

Angela Freudenstein
Washington State Department of Transportation (WSDOT)
Alaskan Way Viaduct and Seawall Replacement Program Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

Re: Comments on the NEPA Environmental Assessment and SEPA
Determination of Nonsignificance / Notice of Adoption for the
SR-99 S. Holgate Street to S. King Street Viaduct Replacement Project

Dear Ms. Freudenstein:

The Washington State Major League Baseball Stadium Public Facilities District (PFD) appreciates the opportunity to continue to review and comment on the SR 99 Alaskan Way Viaduct Replacement project. This comment letter addresses the S. Holgate Street to S. King Street portion of the project (Viaduct south end project), including the NEPA Environmental Assessment and the SEPA determination of nonsignificance (DNS).

The PFD is the public entity that developed and owns the ballpark known as Safeco Field. The PFD is responsible for overseeing this public asset and for ensuring that the public investment in Safeco Field is not compromised. Safeco Field is located just to the east of the Alaskan Way Viaduct south end project and it will be directly affected by the proposed construction activities, including road closures and detours.

The PFD continues to be concerned that project construction could have significant adverse impacts on our facility and our tenant the Seattle Mariners, if appropriate mitigation measures are not implemented. While the EA identifies project impacts and potential mitigation measures, we note that significant elements of the project continue to change and evolve, including the linkage to the central waterfront portion of the Viaduct project. These changes to the proposal will likely result in additional mitigation measures being required. The PFD wants to continue to be consulted on these project changes, and we want to be involved with the design and implementation of appropriate mitigation measures. Absent such involvement and mitigation, the PFD is concerned that project impacts will be significant and an EIS will be required.

B-004-001

We appreciate and understand your concern with this project and are committed to working with the PFD and the Mariners as the project proceeds and throughout the construction process. The EA analyzes the proposed improvements in sufficient detail to determine whether, with avoidance, minimization, and mitigation, there will be significant adverse impacts. Our conclusion is that there will not, but further planning and design work remain to be done. The EA states (see pages 103 and 172) that a detailed traffic management plan will be developed in coordination with the two sports venues. In summary, the EA provides the level of analysis appropriate for this stage of decision making and with this FONSI establishes the necessary commitments for the project to move ahead. We are committed and look forward to working with PFD staff to develop a construction approach that meets everyone's needs.

B-004-001

B-004-002 | The PFD commented in October 2007 on the scope of the environmental assessment (EA), and we are pleased to see that many of our comments have been addressed. The EA appropriately evaluates the impact of the project on key elements of the environment, it provides a detailed history of the evaluation of alternatives leading to the current design, and the cumulative impacts of the Viaduct south end project and other area projects are separately evaluated.

The PFD supports the transportation and infrastructure improvements that the Alaskan Way Viaduct project will provide, and in particular we support the additional northbound and southbound access points in the area of South King Street. The PFD believes that the project can be constructed with appropriate mitigation measures that minimize significant impacts on Safeco Field, the Seattle Mariners, baseball fans, and other facility users. But there are a number of areas where we continue to have concerns. If these elements are not appropriately addressed, the impacts of the Viaduct south end project could be significant and an environmental impact statement would be required:

B-004-003 |

- **Project Changes:** As we noted, some elements of the project may continue to evolve as the project design proceeds and as the central waterfront portion of SR 99 is finalized. We understand that the Port of Seattle and others have concerns with the functionality of the Alaskan Way/Atlantic Street/Colorado Avenue intersection, and that design changes may be made to reduce traffic signal cycles and intersection delays. While the PFD supports changes that improve project operations, we would like the opportunity to review and comment on any future project changes and additional mitigation measures to ensure that they do not have significant adverse impacts on Safeco Field.

B-004-004 |

- **Traffic and Transportation:** The PFD remains concerned about the traffic and transportation impacts that the construction of the Viaduct south end project will have on access to and from the ballpark. We acknowledge the considerable work that has been done by the project team to identify construction impacts and potential mitigation measures for the various project stages. Nonetheless, minimizing construction impacts requires close and careful coordination between WSDOT and all of the other parties with an interest in this area. While the EA identifies some coordination measures (see, e.g., sections 8 and 14 of Appendix B), these measures are quite general and, sometimes, optional (see, e.g., p. 173: "consider establishing an oversight committee. . ."). In order to avoid significant adverse transportation impacts, the PFD believes that traffic and transportation coordination should be a mandatory element of the project mitigation, and that the PFD, the Seattle Mariners and other stakeholders must be directly involved.

The PFD and the Mariners were quite successful in working directly with WSDOT on mitigating the construction impacts of the SR 519 phase 1 project, and we look forward to similar coordination on the Viaduct south end project. Such coordination involves written agreements establishing the parameters and timing for the construction work, on-going regular meetings, both before and during construction, and specific mitigation commitments. For example, the mitigation measures in the EA expressly provide for BNSF and Union Pacific Railroad involvement in certain activities (see, e.g., p. 81: "Any

B-004-002

Thank you for your support and continued coordination as the project moves forward. Attachment 4 of this FONSI contains the mitigation commitment list.

B-004-003

Per your request, project staff have met with PFD staff and Mariners staff to discuss changes to the S. Atlantic Street intersection, construction mitigation, and further construction planning. Your comments have been helpful, and we look forward to your participation throughout the construction planning process.

B-004-004

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.

Consistent with measures described in the EA (see pages 103 and 172) and your comment, we have convened a group of stakeholders, including the Mariners, to help develop the traffic management plan for construction of this project. We appreciate your willingness to participate and look forward to a productive, collaborative relationship.

B-004-004

[track] closures would be coordinated with [the railroads]”). The PFD asks that it and other stakeholders be directly involved in the decision making on traffic and transportation issues that affect Safeco Field.

For example, we believe that a coordination committee should be established for the Viaduct south end project, similar to the “Maintenance of Traffic Task Force” that is being implemented for the SR 519 phase 2 project. Such a committee would provide a meaningful opportunity for reducing project impacts, and we urge that it be included as a required mitigation measure in the record of decision on the project. While the EA describes a “Downtown Transportation Operations Committee” (EA, p. 103), the focus of that committee may be too broad and too diffuse to address issues that are specific to the operations around the stadium area. In any event, the PFD wants to ensure that the PFD and the Mariners will be consulted and made a part of the on-going mitigation planning and implementation process for this project.

B-004-005

Lane Closures and Detours: The EA notes that traffic will be restricted and detoured at times during project construction (EA, p. 80, Question No. 3). The PFD agrees with the priorities established by WSDOT to “maintain traffic capacity on SR 99 as much as practical,” to “minimize effects to First Avenue S.,” and to “maintain access to and from area businesses and the stadiums” (EA, p. 80). The PFD is concerned, however, with the blanket statement later in this section that full closures of SR 99 would occur “only during nights and weekends.” Obviously, such closures could have a tremendous impact on ballpark operations if scheduled to occur concurrent with baseball games or other large events. All construction activities, and in particular lane or roadway closures, should be coordinated with events scheduled at Safeco Field.

The PFD believes that the impact of lane closures and associated detours on Safeco Field could be significant, absent appropriate mitigation. The development of an adequate traffic control management plan (TMP) is essential to ensuring that these potentially significant impacts are mitigated. While development of a TMP is identified as a potential mitigation measure and the PFD is identified as a participant in the TMP development process (see, EA, p. 96), we want to ensure that we will be consulted and included in the discussion of all project lane closures and detours affecting Safeco Field. While there are literally hundreds of events scheduled at Safeco Field every year, there are also times when construction and road closures could occur with very little disruption to Safeco Field operations. The PFD wants to ensure that it can participate in the decision making process in order to minimize impacts to our facility. Again, without such participation, the PFD believes that the impacts on Safeco Field could be significant and an environmental impact statement should be required.

B-004-005

The project team looks forward to coordination with the PFD. 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.

B-004-006

- **Parking Loss:** Temporary and permanent loss of parking is discussed in the EA, but the impacts of this loss may be understated. The PFD believes that these losses could be significant and that mitigation for these losses should be addressed in the TMP. In particular, construction worker parking could contribute further to the loss of area-wide parking, if special provisions for such parking are not made.

B-004-007

Finally, we note that the Seattle Mariners have submitted a separate comment letter. The PFD has reviewed that comment letter and joins in the concerns and issues raised by the team.

The continued success of Safeco Field turns in large part on our baseball fans and other event patron's ability to access our facility and to enjoy events, both large and small. The PFD understands that facility access may be affected during construction of the Viaduct south end project, but we believe that if we work together on mitigation planning and implementation, the impacts of construction can be reduced so that they are not significant and so that no environmental impact statement is required.

Again, we appreciate the opportunity to comment. We look forward to seeing this project proceed and to seeing all of the mitigation measures identified in the EA implemented. We look forward to working with WSDOT and the consultant team on this important project. If you have any questions, please give our Executive Director, Kevin Callan, a call at (206) 664-3076 or (206) 767-7800.

Sincerely yours,

WASHINGTON STATE MAJOR LEAGUE BASEBALL STADIUM PUBLIC FACILITIES DISTRICT



Robert C. Wallace, Board Chair

Cc: PFD Board Members
Kevin Callan, Executive Director
Tom Backer, Legal Counsel
Bart Waldman, Seattle Mariners
Susan Ranf, Seattle Mariners

B-004-006

The use of any on-street parking spaces by construction workers would have to be coordinated and approved by the City. WSDOT is considering restricting construction workers from using parking spaces that could otherwise be used by event attendees or by customers of local businesses. Additional strategies for construction worker parking will be coordinated with local stakeholders.

B-004-007

Responses to the Seattle Mariners letter can be found in item B-003. WSDOT will continue to coordinate with the PFD and 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.

1 BE IT REMEMBERED that on Thursday,
2 July 10, 2008, at an Alaskan Way Viaduct Meeting,
3 taking place at 1119 8th Avenue, Ballard, Washington,
4 the following comments were given, to wit:

5
6 <<<<<< >>>>>>

7
8 MS. GIBBS: We feel good about the
9 section that's being planned. Personally, we are not
10 proponents of having the viaduct continue north and
11 cutting off the central part of the city as it does
12 now. I understand that there is a -- there's
13 different proposals out, and one of them is a big
14 tunnel that goes down from that point, from King
15 Street, going north, and I am assuming that that would
16 be too expensive to do.

17 I would rather see people being encouraged even
18 more to come into town by using mass transit and using
19 the bus system and the trolley system that's being
20 proposed for the central waterfront streetcar, that
21 that would then distribute people in downtown.

22 When there was work on basically the same latitude
23 on the freeway this last year, there was big concern
24 about traffic jams, but people were informed, and
25 people found different ways to get downtown, and there

H-001-001

The State of Washington, King County, and the City of Seattle are working together to find a solution for the central waterfront section of the viaduct. However, the Environmental Assessment for the S. Holgate Street to S. King Street Viaduct Replacement Project does not address the scenarios being evaluated for the central waterfront. Comments on the central waterfront project have been shared with the central waterfront team, and any future comments can be submitted to viaduct@wsdot.wa.gov.

H-001-002

In an effort to reduce the congestion associated with construction, the project will be encouraging people to take transit or carpool. Buses could be added to King County Metro's fleet, and transit service could be expanded. Transit service improvements will focus on the routes between downtown Seattle and the areas most affected by construction: West Seattle, Ballard, and Aurora Avenue N. King County Executive Ron Sims announced the \$32 million aid package from the State to moderate construction congestion in early September 2008.

18:50:31 1 MR. McINTOCH: All right. My name
18:50:33 2 is James McIntosh, and I am impressed with the
18:50:39 3 planning that's gone into this south end of the
18:50:44 4 waterfront, SR 99 replacement of the Alaskan Way
18:50:50 5 Viaduct. It's well thought out. I was at a public
18:50:53 6 hearing in August -- well, it was an open house in
18:50:56 7 August, and now here, and you people have really done
18:51:01 8 your homework.

H-002-0019
18:51:10 10 The only comment or concern I would have is the
18:51:16 11 route alignment is well thought out up to about King
18:51:18 12 Street, but then the place where there is really a lot
18:51:22 13 of uncertainty is the central waterfront because it's
18:51:28 14 just not decided with the City and stakeholders as to
18:51:32 15 what they are going to do on the central waterfront,
18:51:35 16 which is the bulk of the Alaskan Way Viaduct structure
that's along the central waterfront.

18:51:37 17 And as we all know, the current bridge is over 50
18:51:41 18 years old, and personally, on my end of things, I
18:51:46 19 would like to see it replaced and -- but not along the
18:51:52 20 central waterfront at all. I would like to see lane
18:51:56 21 capacity expanded on the I-5. In other words, an I-5
18:52:01 22 rebuild. That would involve straightening out
18:52:05 23 sections of the I-5 freeway, adding some lanes, maybe
18:52:11 24 up to three or four lanes, through the central part of
18:52:16 25 downtown on I-5.

H-002-001

The State of Washington, King County, and the City of Seattle are working together to find a solution for the central waterfront section of the viaduct. However, the Environmental Assessment for the S. Holgate Street to S. King Street Viaduct Replacement Project does not address the scenarios being evaluated for the central waterfront. Comments on the central waterfront project have been shared with the central waterfront team, and any future comments can be submitted to viaduct@wsdot.wa.gov.

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H-002-001

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You would have to tunnel underneath 4th Avenues and 5th -- 6th Avenue -- well, probably 5th and 6th Avenues would involve tunnels that go parallel to I-5. And then you could build additional tunnel connections over to the Battery Street tunnel to connect with the east-west traffic that would be going through there and connecting over to, say, Ballard and Magnolia.

But that's a long story. I understand there's a stakeholders' meeting, you know, on July 24th. And, you know, the central waterfront is just not decided. The south end is very well thought out; it's very well agreed upon that to build a surface roadway just makes sense because it's already going through an industrial area and, you know, it doesn't need to go through tunnels, and it doesn't need to be on a bridge. You know, it could be, but there is the one overpass over the train tracks going into the Port of Seattle.

But the amount of financial input, building ramps that go up to the old portion of the viaduct, they don't need to spend a whole lot of money because those ramps may only be in place for three or four years because if it's decided to remove the -- the heavy traffic on Highway 99 away from the waterfront, which I hope they do, they won't need -- they won't need a big bridge along the waterfront anymore. And the new

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H-002-001

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18:55:46

1 traffic would have to be routed probably through
2 Spokane Street and some other streets over to I-5. So
3 connections really -- the east-west connections should
4 be developed where traffic can get from, say, West
5 Seattle over to I-5.

6 In other words, the Spokane Street viaduct would
7 have to be upgraded to maybe add a lane or two there
8 and to build better ramps over to the I-5 freeway,
9 northbound and southbound, but just to better connect.

10 It's sort of like the West Seattle Bridge
11 connecting with Highway 99, you know, never was
12 connected because you got one -- you got one of four
13 cloverleaves. There's one cloverleaf on -- you know,
14 if you look at -- the cloverleaves were built like in
15 California back in the '60s. They were -- there were
16 four of them. Well, there is only one cloverleaf on
17 this, where you exit from the Alaskan Way -- or from
18 Spokane Street viaduct and you get on Highway 99
19 northbound, where there is one loop there, but, say,
20 you can't go from the Spokane Street viaduct and get
21 onto Highway 99 northbound. It's just not possible.

22 So the 99 corridor really should be connected over
23 to the I-5 corridor, because in the late '50s, that
24 was the plan, to build an interstate highway system to
25 make the interstate highways your fast routes through

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H-002-001

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the cities, and then the old state highways were to be pretty much surface streets, the slower old-fashioned, you know, roadside-attraction-type highways. That was the old highway system that was in place from 1913 up until the -- you know, the interstate highway system.

So I think that pretty much concludes my thoughts, that don't put a whole lot of money into the ramps that go up to the Alaskan Way Viaduct because they might not be there very long because if they tear down the central viaduct, then, you know, they won't need those ramps anymore.

And they really should focus on south connections, the Spokane Street and Atlantic Street connections over to I-5. So they really should focus on that. I am hoping that we can find an alternative to get traffic off of that central waterfront bridge.

It's too bad the thing was built. That was 50 years ago. It's too bad it was built when we were stuck with the traffic along the central waterfront. It really was railroaded through back in the '40s and never should have been built back then. But it was -- it was done in the middle of the night, and no one was really paying much attention.

And -- but now, you know, the waterfront has changed. You know, in 50 years, there's -- you know,

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H-002-001

18:57:22 1 tourism has grown, a need for a central park along --
18:57:26 2 you know, access to the waterfront. For the people --
18:57:29 3 people to the city it's very important. It's a
18:57:32 4 beautiful view. We have one of the most pretty, most
18:57:36 5 majestic central waterfronts in the country, you know,
18:57:39 6 and it -- there just should not be a heavy noisy
18:57:44 7 bridge along that central waterfront, and that
18:57:46 8 violates the Shoreline Management Act and everything.
18:57:49 9 You know, you don't build heavy bridges along
18:57:54 10 shorelines. You know, that's just not part of the
18:57:56 11 general accepted planning principles.

18:57:59 12 On one other thing, I am glad they are tearing
18:58:02 13 down the one mile of viaduct south of King Street
18:58:07 14 because it is a liability for the State to have this
18:58:11 15 heavy bridge. If an earthquake were to hit, a lot of
18:58:15 16 people could die, you know, with a collapse of a
18:58:18 17 bridge, especially around heavy traffic times. And to
18:58:22 18 get that down is important. So I'm glad they are
18:58:25 19 doing that. It reduces the liability for the State,
18:58:28 20 so I'm glad they are doing that.

18:58:30 21 So that's my comments. They shouldn't put a whole
18:58:34 22 lot of money into the ramps that go up to the old
18:58:37 23 portion of the old Alaskan Way Viaduct. Thank you
18:58:40 24 very much.

18:58:40 25 ///

H-003-001

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MS. BROWNING: Well, I would just like to say that, you know, the destruction was built, 1953, and it -- it's a landmark of the city's, such as like the Space Needle. And I have seen bumper stickers of people saying, "oh, no, on cars," saying, "I love the viaduct."

So the majestic views, as you drive or take the metro on State Route 99 looking out into the -- is that the Elliot Bay, or what is that -- big body of water where the sailboats and ferries and you see the Olympic mountains, it's breathtaking and an aura of romance, you know.

Tourists have the sense of -- they fall in love with the city, you know, the beauty of the city just as they are traveling south from California all the way to Canada, you know. Taking that stretch of road, it's just a majestic sight.

So if -- if there is an opportunity of -- of -- of taking it apart and erecting a brand new viaduct, you know, hallelujah, hallelujah, thank you, Lord, thank you, Lord, because the first time I heard that they were going to tear it down and have a tunnel, I cried; I literally cried because I have fallen -- I have fallen in love with just the sight of it all.

So that's my comment for now until I am in West

H-003-001

Thank you for your comment regarding your preference for an elevated structure for the central waterfront. The State of Washington, King County, and the City of Seattle are working together to find a solution for the central waterfront section of the viaduct. However, the Environmental Assessment for the S. Holgate Street to S. King Street Viaduct Replacement Project does not address the scenarios being evaluated for the central waterfront. Comments on the central waterfront project have been shared with the central waterfront team, and any future comments can be submitted to viaduct@wsdot.wa.gov.

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H-003-001

19:02:36

Seattle on Tuesday, July 15th.

19:02:38

And thank you. Thank you very much, and may God
guide the final decision by the governing bodies.

19:02:42

19:02:47

Thank you.

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1 BE IT REMEMBERED that on Tuesday,
2 July 15, 2008, at an Alaskan Way Viaduct Meeting
3 taking place at 3429 45th Avenue SW, Seattle,
4 Washington, at 5:00 p.m., before JUDY
5 STEENBERGEN-WEBB, CCR, RPR, Notary Public in and for
6 the State of Washington, the following public comments
7 were given, to wit:

8
9 <<<<<< >>>>>>
10

H-004-001

11
12 ANONYMOUS SPEAKER: WSDOT claims
13 that the views from the southern portion of the
14 viaduct would not be substantially different. This is
15 not true. Clearly the view is many times better
16 currently when travelling northbound, though not as
17 extensive as the views discussed in the April 6, 2008,
18 edition of the Seattle Times Pacific Northwest Sunday
19 Magazine for rich condo buyers and businesses.

20 The views that riding on the viaduct provides are
21 dynamic, offering a splendid slice of Seattle.
22 Furthermore, this is public, not just for car and SUV
23 users, but open to anyone who can afford bus fair.

24 Unlike land acquisition problems with the
25 Monorail, this right-of-way is already in use proving

Public Comments
July 15, 2008

H-004-001

In Chapter 3 of the EA (p. 59), under the question "How would the project affect views?," the text states that "views from the new SR 99 roadway would not be substantially different than views from the existing viaduct. Motorists traveling northbound would still experience panoramic views of the downtown skyline." It goes on to state that for southbound SR 99 travelers, the "views of the stadiums and SODO area ... would improve somewhat with the new roadway configuration, because these views would no longer be blocked by the upper roadway."

Your preference for an elevated structure alternative solution continuing north through the downtown area, and the views that an elevated structure would provide, are noted and acknowledged here.

H-004-001

1 that elevated viaduct wouldn't require buying up lots
2 more land. Rebuild the double-deck structure in
3 place.

4 The views from the viaduct travelling northbound
5 are so spectacular that they should be UN, United
6 Nations; environmentally protected. Maintaining the
7 Seattle quality of life exhibited by the northbound
8 views doesn't appear to have been considered at all
9 after the spring 2006 Show and Tell.

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Public Comments
July 15, 2008

H-005-001

1 MR. SHASTEEN: My name is Bud
2 Shasteen, S-H-A-S-T-E-E-N, Bud. I'm just here
3 representing the viaduct preservation group, and we
4 are absolutely convinced that retrofit is the only way
5 that this project should be done, save billions of
6 dollars in original costs and also no delays to our
7 traffic, no loading up I-5, so many advantages, we
8 don't see what the big push is to tear the viaduct
9 down.

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Public Comments
July 15, 2008

H-005-001

WSDOT has found that the retrofit alternative is not a fiscally responsible alternative and would not bring the structure up to current safety standards. A recent independent consultant evaluation¹, ² also found that the retrofit is not technically or fiscally prudent. The executive summary from the Independent Consultant Retrofit Report can be found on the WSDOT website under the Stakeholder Advisory Committee - July 24, 2008 section: <http://www.wsdot.wa.gov/Projects/Viaduct/library-meetingmaterials.htm>.

According to WSDOT estimates, the retrofit scheme proposed by the Viaduct Preservation Group would cost approximately 80 percent of the cost of replacing the viaduct. A retrofitted structure would still have inadequate lane widths, no emergency shoulders, and substandard acceleration and deceleration lanes, along with a level of seismic safety risk that is well beyond current standards. Construction of any of the retrofit schemes proposed to date would result in significant and long-term disruptions to traffic both on and around the viaduct.

¹ KPFF Consulting Engineers. 2008a. Executive Summary - Evaluation of Seismic Retrofit Options for the Alaskan Way Viaduct presented to the Stakeholders Advisory Committee Briefing on July 17, 2008, by Andrew W. Taylor, Ph.D., SE, FACI.

² KPFF Consulting Engineers. 2008b. Evaluation of Seismic Retrofit Options for the Alaskan Way Viaduct Final Report. September 25, 2008.

H-006-001

1 MR. CESMAT: My name's Paul Cesmat.
2 I'm a long-time resident of West Seattle, and I'd like
3 to address the mitigating measures of parking.

4 There's a lot of parking spots that are going to
5 be removed both during construction and forever the
6 project is completed. In reading the EIS, in reading
7 the environmental assessment, it states that the
8 parking that is being removed is not going to be
9 replaced, and it says no mitigation is needed. No
10 mitigation is planned for parking during special
11 events or any other time.

12 I feel that the parking spots could be replaced in
13 a park and ride in neighboring communities such as
14 West Seattle to allow for people to take a different
15 mode of transportation from a central hub.

16 I feel that transportation should be looked at
17 more thoroughly and parking should be replaced in one
18 form or another and replacing it in the community so
19 that public transportation could be used easier is a
20 good mitigating measure for replacement. That's all.

21 (End of comments.)

22 (Meeting adjourned at

23 8:00 p.m.)

24

25

Public Comments
July 15, 2008

H-006-001

The project team has worked with WSDOT, King County, and SDOT to develop a series of projects that would provide transit enhancements that further encourage transit use. These projects and strategies are called the SR 99/Viaduct Project Initial Transit Enhancements and Other Improvements and will help maintain overall travel mobility and keep the system moving during construction of the Moving Forward projects. These projects and strategies include additional transit service hours, facilities to monitor transit reliability, traveler information systems, improvements to arterial and street traffic operations, and supporting transportation demand management efforts and other projects. Event attendees will benefit from these projects and will continue to be encouraged to use transit and to carpool to events.



South Holgate Street to South King Street Viaduct Replacement Project Comment Form

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WSDOT studied a number of factors during the environmental assessment process, such as transportation, land use, visual quality and air quality. Do you have comments on any of our findings?

I-001-001

Who is providing funding for additional bus transportation. Shouldn't we be asking the City of Seattle to fund. METRO is strapped serving the East & South suburbs

At 50% reduced capacity for 2 years this project narrows the central waterfront capacity

Current bus reliability is not good & that is with new 6'0 increase this year
 Do you have any additional comments on the environmental assessment?

Has anyone studied transportation issues that arose after the Earthquake

I-001-001

WSDOT is providing funding for additional bus service hours. Additional transit options are being studied as part of the central waterfront environmental impact statement. The Alaskan Way Viaduct and Seawall Replacement Program began shortly after the 2001 Nisqually earthquake, and the program has incorporated transportation studies into each of the environmental analyses for every major construction project that has been proposed.



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WSDOT studied a number of factors during the environmental assessment process, such as transportation, land use, visual quality and air quality. Do you have comments on any of our findings?

I-002-001

If the EIS on the south end replacement ~~and~~ acknowledges that traffic flows will be greatly reduced as a result of diverting traffic onto other ~~and~~ viaducts (2nd + 4th AVE, etc.) and detour routes during the project's construction, it would seem that similar, slow, congested traffic flows would remain if a surface only approach is utilized on the entire waterfront. By your own calculations and studies, the EIS has determined that as a result of using surface roads and diverting of traffic away from the waterfront, as the primary surface-only option on the main waterfront ^{also} proposes, congestion will be a major problem and concern for maintaining vehicular flows. It would seem ~~that~~ the EIS Do you have any additional comments on the environmental assessment?
 For the South End Replacement would show you that a strictly surface-only option will not be a sufficient solution for Seattle's waterfront.

I-002-001

The State of Washington, King County, and the City of Seattle are working together to find a solution for the central waterfront section of the viaduct. However, the Environmental Assessment for the S. Holgate Street to S. King Street Viaduct Replacement Project does not address the scenarios being evaluated for the central waterfront. Comments on the central waterfront project have been shared with the central waterfront team, and any future comments can be submitted to viaduct@wsdot.wa.gov.



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WSDOT studied a number of factors during the environmental assessment process, such as transportation, land use, visual quality and air quality. Do you have comments on any of our findings?

I-003-001

WSDOT claims that the views from the southern portion will not be substantially different. This is not true.
 Clearly, the view is many times better currently when traveling N. Though not as extensive as the views discussed in the April 6, 2008 edition of the "Seattle Times Pacific Northwest Sunday Magazine" for rich condo buyers & businesses, the views that riding on the viaduct provides are DYNAMIC, offering a splendid view of Seattle. Furthermore, this is public, not just for car/bus users but open to anyone who can afford bus fare. Unlike land acquisition problems with the monorail, this right-of-way is already in use; improving the elevated viaduct wouldn't require buying up lots/lands. Rebuild the double-decker structure in place.

Do you have any additional comments on the environmental assessment?
 The views from the viaduct traveling northbound are so spectacular that they should be U.N. environmentally protected.

Maintaining the Seattle "quality of life" exhibited by the N-bound views doesn't appear to have been considered at all after the spring 2006 show-and-tell.

I-003-001

In Chapter 3 of the EA (p. 59), under the question "How would the project affect views?," the text states that "views from the new SR 99 roadway would not be substantially different than views from the existing viaduct. Motorists traveling northbound would still experience panoramic views of the downtown skyline." It goes on to state that for southbound SR 99 travelers, the "views of the stadiums and SODO area ... would improve somewhat with the new roadway configuration, because these views would no longer be blocked by the upper roadway."

Your preference for an elevated structure alternative solution continuing north through the downtown area, and the views that an elevated structure would provide, are noted and acknowledged here.



**South Holgate Street to South King Street
Viaduct Replacement Project
Comment Form**

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WSDOT studied a number of factors during the environmental assessment process, such as transportation, land use, visual quality and air quality. Do you have comments on any of our findings?

I-004-001

PRESENTATION ON 7/15/08 LOOKS GOOD
PLEASE DO WHATEVER CAN BE DONE TO IMPROVE BIKE
ACCESS FROM WEST SATTLE / ~~WASH STATE~~ TO I-90
CURRENT STREET ACCESS IS NOT SAFE ENOUGH.

Do you have any additional comments on the environmental assessment?

I-004-001

Providing bike access to I-90 is outside of the SR 99 project area. Independently of this project, the Seattle Department of Transportation is working with the Washington State Department of Transportation to identify and secure matching funds and begin preliminary planning for a connection between the I-90 trail and downtown Seattle.



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WSDOT studied a number of factors during the environmental assessment process, such as transportation, land use, visual quality and air quality. Do you have comments on any of our findings?

I-005-001

*- APPRECIATE THE PRESENTATIONS IN WEST SEATTLE
ON 7/15/08
* THANKS FOR CONSIDERING CYCLISTS ROUTES AND SAFETY.
* PLAN LOOKS GOOD.*

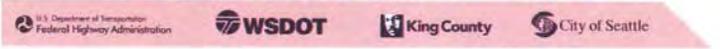
Do you have any additional comments on the environmental assessment?

I-005-001

Thank you for attending the public hearing on July 15, 2008. The bike paths for cyclists are an important element of the urban design developed for this project.

With regard to your comment about the No Replacement alternative for the central waterfront, it is important to note that the State of Washington, King County, and the City of Seattle are working together to find a solution for the central waterfront section of the viaduct. However, the Environmental Assessment for the S. Holgate Street to S. King Street Viaduct Replacement Project does not address the scenarios being evaluated for the central waterfront. Comments on the central waterfront project have been shared with the central waterfront team, and any future comments can be submitted to viaduct@wsdot.wa.gov.

Alaskan Way Viaduct & Seawall Replacement Program | Moving Forward



Would you like to be added to the viaduct program e-mail list for monthly updates?
Yes ___ No ___
Name: _____ Organization (optional): _____
E-mail: _____
Zip: _____

How did you hear about the public hearing?

- Newspaper
- Postcard
- Legal Notice
- Monthly viaduct e-mail updates
- Word of mouth
- Other

Visit the program Web site for more information: www.alaskanwayviaduct.org
E-mail your comments on the environmental assessment to:
SouthViaductEA@wsdot.wa.gov

Additional Comments:

I-005-001 PHASE 1 LOOKS GOOD FOR 3/12/99. PLEASE DO NOT GO WITH "NO RECOMMENDATION"
OPTICAL CITY NEWS NEW VIADUCT ON TUNNEL, SURFACE STREETS ^{WENT WORK FOR} TOGETHER THEM ^{NOISE}

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First class
Postage

Washington State Department of Transportation
Attn: Angela Freudenstein
999 Third AVE Suite 2424
Seattle, WA 98104



South Holgate Street to South King Street Viaduct Replacement Project Comment Form

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WSDOT studied a number of factors during the environmental assessment process, such as transportation, land use, visual quality and air quality. Do you have comments on any of our findings?

I-006-001

JUST BUILD IT.

It seems the extensive public
 show times show boards/staff gathered
 after hours are ~~the~~ part of
 lengthening the time it takes to
 get the viaduct replaced with
 something better.

JUST BUILD IT.

Do you have any additional comments on the environmental assessment?

I-006-002

Seems good, from a lay person's
 perspective. It would be good to
 get a decision on the central part of
 the viaduct (TUNNEL!) and get
 going on that too

I-006-001

WSDOT and FHWA, in cooperation with the City of Seattle, are working to move ahead with replacing the section of the viaduct between S. Holgate Street and S. King Street. We look forward to starting construction in mid-2009.

I-006-002

The State of Washington, King County, and the City of Seattle are working together to find a solution for the central waterfront section of the viaduct. However, the Environmental Assessment for the S. Holgate Street to S. King Street Viaduct Replacement Project does not address the scenarios being evaluated for the central waterfront. Comments on the central waterfront project have been shared with the central waterfront team, and any future comments can be submitted to viaduct@wsdot.wa.gov.

Alaskan Way Viaduct & Seawall Replacement Program | Moving Forward



U.S. Department of Transportation Federal Highway Administration | WSDOT | King County | City of Seattle

Would you like to be added to the viaduct program e-mail list for monthly updates?

Yes ___ No ___

Name: _____ Organization (optional): *Citizens of West Seattle*

E-mail: _____

Zip: *98136*

How did you hear about the public hearing?

Newspaper Postcard Legal Notice

Monthly viaduct e-mail updates Word of mouth Other

Visit the program Web site for more information: www.alaskanwayviaduct.org

E-mail your comments on the environmental assessment to:

SouthViaductEA@wsdot.wa.gov

I-006-002

Additional Comments:

Please build a tunnel, make the top of the tunnel PUBLIC PARK, and do it soe

Affix
First class
Postage

Washington State Department of Transportation
Attn: Angela Freudenstein
999 Third AVE Suite 2424
Seattle, WA 98104

Alaskan Way Viaduct & Seawall Replacement Program | Moving Forward



Would you like to be added to the viaduct program e-mail list for monthly updates?

Yes _____ No

Name: _____ Organization (optional): _____

E-mail: WEST SEATTLE RESIDENT

Zip: 98106

How did you hear about the public hearing?

Newspaper

Postcard

Legal Notice

Monthly viaduct e-mail updates

Word of mouth

Other

Visit the program Web site for more information: www.alaskanwayviaduct.org

E-mail your comments on the environmental assessment to:

SouthViaductEA@wsdot.wa.gov

Additional Comments:

Affix
First class
Postage

Washington State Department of Transportation
Attn: Angela Freudenstein
999 Third AVE Suite 2424
Seattle, WA 98104



South Holgate Street to South King Street Viaduct Replacement Project Comment Form

The Federal Highway Administration (FHWA) and the Washington State Department of Transportation (WSDOT) welcome your comments on the environmental assessment for the South Holgate Street to South King Street Viaduct Replacement Project. Please respond to the below questions and drop them in a comment box, or return to the address listed on the other side. To be considered as part of the official hearing period, comments must be postmarked by Aug. 11, 2008.

WSDOT studied a number of factors during the environmental assessment process, such as transportation, land use, visual quality and air quality. Do you have comments on any of our findings?

I-008-001

SURELY IT WOULD BE PREFERABLE TO INCLUDE AN INTERCHANGE OR PARTIAL INTERCHANGE, AT SOUTH ATLANTIC STREET.

Do you have any additional comments on the environmental assessment?

I-008-001

The potential changes to the intersections at S. Royal Brougham Way and S. Atlantic Street have been studied extensively over the past several years, with considerable coordination with the City of Seattle and other major stakeholders, such as the Port of Seattle and the freight community.

Existing right-of-way constraints preclude a full interchange at S. Atlantic Street for several reasons. One of the important considerations was to minimize any right-of-way effects to the Bemis Building at First Avenue S. and S. Atlantic Street. The Bemis Building has been identified as a historic property that is eligible for the National Register of Historic Places, and therefore considered a historic resource under Section 106 of the National Historic Preservation Act.

Alaskan Way Viaduct & Seawall Replacement Program | Moving Forward



Would you like to be added to the viaduct program e-mail list for monthly updates?

Yes No
Name: MAURICE G. COOPER Organization (optional): MADISON PARK COMMUNITY COUNCIL
E-mail: mcooper@kaimail.com
Zip: 98112

How did you hear about the public hearing?

Newspaper Postcard Legal Notice
Monthly viaduct e-mail updates Word of mouth Other

Visit the program Web site for more information: www.alaskanwayviaduct.org
E-mail your comments on the environmental assessment to: SouthViaductEA@wsdot.wa.gov

Additional Comments:

Affix
First class
Postage

Washington State Department of Transportation
Attn: Angela Freudenstein
999 Third AVE Suite 2424
Seattle, WA 98104

From: [Laura Drake](#)
To: [NW South Viaduct EA](#)
CC:
Subject: RE: Holgate to King St.
Date: Monday, August 04, 2008 10:42:33 PM
Attachments:

I-009-001

The State of Washington, King County, and the City of Seattle are working together to find a solution for the central waterfront section of the viaduct. However, the Environmental Assessment for the S. Holgate Street to S. King Street Viaduct Replacement Project does not address the scenarios being evaluated for the central waterfront. Comments on the central waterfront project have been shared with the central waterfront team, and any future comments can be submitted to viaduct@wsdot.wa.gov.

I-009-001 | I will always remain totally against building a tunnel however -- less chance for growth, dangerous in case of an earthquake or car crash, terrible in a traffic jam --

And I believe that with the million dollar condos being built downtown and with all the views being covered by more and more new buildings, the best view anyone of any income can get is driving into Seattle on the viaduct -- with the city on your right and the beautiful bay on your left, and the smell of salt water and French fries!!

Laura Drake

From: [finharvey](#)
To: [NW South Viaduct EA](#)
CC:
Subject: Environmental Assessment Comments
Date: Friday, August 01, 2008 9:24:34 AM
Attachments:

I-010-001 Having read the environmental impact statement on the southern part of the AWV, I must comment about an inaccuracy that I noticed. While it is true that the visual impact or views while driving south on it won't be substantially different, going north is a whole other story. Under the EIS, side-by-side traffic means that southbound traveling trucks and buses would obstruct the views of those traveling northbound.

Currently traveling north gives magnificent views (serendipitously provided by the original AWV designers) that are so spectacular that they merit "United Nations Heritage Drive" designation. Starting at Holgate, we see the Coast Guard pier and the Pier 46 cargo containers and cranes to the west and soon the baseball field and football stadium to the east. As we get higher, we see the Olympic Mountains and Puget Sound with its tankers, ferries and pleasure craft to the west and to the east the varied architecture of the city. But the view doesn't stop here at S. King St. even tho the project does; to the west is even more of the Sound, mountains, and water traffic, and to the east more city, up close and personal. When passing the Ferry Terminal, we get a glimpse to the north of how ugly the city could become when development is allowed right to the water. True, after Pine Street, the views aren't so special, but the EIS was about the South End of the AWV, not the entire thing.

Clearly, the view is many times better when traveling on the viaduct, compared to surface, tunnel, or side-by-side, particularly heading north. Though not as extensive as the views discussed in the April 6, 2008 edition of the "Seattle Times Pacific Northwest Sunday Magazine" for rich condo buyers and businesses, the views that riding on the viaduct provides are DYNAMIC, offering a splendid slice of Seattle. Furthermore, this is public, not just for car/SUV users but open to anyone who can afford bus fare. Unlike land acquisition problems with

I-010-001

In Chapter 3 of the EA (p. 59), under the question "How would the project affect views?," the text states that "views from the new SR 99 roadway would not be substantially different than views from the existing viaduct. Motorists traveling northbound would still experience panoramic views of the downtown skyline." It goes on to state that for southbound SR 99 travelers, the "views of the stadiums and SODO area ... would improve somewhat with the new roadway configuration, because these views would no longer be blocked by the upper roadway."

Your preference for an elevated structure alternative solution continuing north through the downtown area, and the views that an elevated structure would provide, are noted and acknowledged here.

I-010-001 | monorail, this right-of-way is already in use; improving the elevated viaduct wouldn't require buying up lots of land. Visitors immediately recognize our quality-of-life from traveling north on the viaduct.

Furthermore, even if transportation no longer depends on fossil fuels, (for examples, either a return to animal use, or some type of ground-effects hovercraft,) the northbound view would still be spectacular and should not be given up to benefit greedy downtown interests.

Now that I've presented a case to maintain the views, let me discuss ways to do so. 1) depending on a positive outcome of the Miyamoto report, retrofit the existing viaduct all the way from the Battery St. tunnel to S. Holgate St.
2) modifying Scenario D slightly, have the elevated structures at different heights with the northbound lanes higher than the southbound lanes and extend this the entire length of the existing viaduct. It would appear that this would satisfy all the federal highway safety standards and satisfy the majority of viaduct users including Seattle-dwellers, all 500000+ not just those living downtown.

I-010-002 | I still think that demanding that the "South End" solution be applicable to any of tunnel, surface, or elevated side-by-side for the central waterfront and then claiming that the only solution that meets that criterion is what is described in the EIS, is removing the elevated double-deck viaduct by "stealth engineering".

Harvey Friedman fnharvey@zipcon.net

I-010-002

In the Environmental Assessment, the alignment evaluated between S. Holgate and S. King Streets would connect to the existing double-level viaduct near S. King Street. It would not preclude SR 99 from being replaced with a double-level structure in the central waterfront area. The State of Washington, King County, and the City of Seattle are working together to find a solution for replacing the central waterfront section of the viaduct.

From: [Victor Gray](#)
To: [NW South Viaduct EA](#);
CC: bckeller@worldnet.att.net; ArthurMSkolnik@comcast.net;
Subject:
Date: Saturday, August 09, 2008 1:13:10 PM
Attachments:

Angela Freudenstein 8/9/08
WSDOT
999 Third Avenue, Suite 2424
Seattle, WA 98104-4019

Re: EIS; South Viaduct Replacement Project

The Viaduct Preservation Group wishes to comment on the draft EIS as follows.

- I-011-001** | 1. The document should be rejected as incomplete as it does not consider the proposed retrofit of the viaduct.
- I-011-002** | 2. The document states that the existing viaduct is unsafe and vulnerable due to deep soft soils. Yet the DOT proposes to strengthen the soils for the new structure by soils improvement such as soil mixing or jet grouting. This is the same improvement that we propose for the entire viaduct. The retrofit will provide a safe structure at a minimum cost compared to the 544 million proposed project.
- I-011-003** | 3. The EIS does not deal with the 110,000 cars that use the viaduct and how they would be handled during the 4 years of construction of the build alternate. References to impacted intersections for 2030 traffic is inadequate
4. The cost to the public of traffic disruption during the 4 years of construction is not considered or mentioned at all. Yet it is a real cost estimated over 2 billion each year that the viaduct is out of service. A

I-011-001

WSDOT has found that the retrofit alternative is not a fiscally responsible alternative and would not bring the structure up to current safety standards. A recent independent consultant evaluation^{1, 2} also found that the retrofit is not technically or fiscally prudent. The executive summary from the Independent Consultant Retrofit Report can be found on the WSDOT website under the Stakeholder Advisory Committee - July 24, 2008 section: <http://www.wsdot.wa.gov/Projects/Viaduct/library-meetingmaterials.htm>.

According to WSDOT estimates, the retrofit scheme proposed by the Viaduct Preservation Group would cost approximately 80 percent of the cost of replacing the viaduct. A retrofitted structure would still have inadequate lane widths, no emergency shoulders, and substandard acceleration and deceleration lanes, along with a level of seismic safety risk that is well beyond current standards. Construction of any of the retrofit schemes proposed to date would result in significant and long-term disruptions to traffic both on and around the viaduct.

¹ KPFF Consulting Engineers. 2008a. Executive Summary - Evaluation of Seismic Retrofit Options for the Alaskan Way Viaduct presented to the Stakeholders Advisory Committee Briefing on July 17, 2008, by Andrew W. Taylor, Ph.D., SE, FACI.

² KPFF Consulting Engineers. 2008b. Evaluation of Seismic Retrofit Options for the Alaskan Way Viaduct Final Report. September 25, 2008.

I-011-002

Refer to Chapter 6 "Transportation Conditions During Construction" in Appendix F, Transportation Discipline Report, for more detailed information on construction traffic conditions. Appendix F, Section 5.1.2 Traffic Operations, also provides more detail on intersection level of service and average vehicle delay for 2030 conditions.

I-011-003 | substantial amount of that would be assigned to the proposed build alternate.

I-011-004 | 5. What ever happened to the old fashioned cost benefit ratio that was used to evaluate the effects of a project. Will the City and State be better off with a new build at a cost of 544 million as compared to a retrofit?. After all the existing south section of the viaduct was not damaged during the 2001 quake and has served the traffic needs for the last 7 years.

The Viaduct Preservation Group
Victor O. Gray
120 Colman Drive
Port Townsend, WA 98368
360-379-9862

Sent by Email southviaductEA@wsdot.wa.gov

I-011-003

The Alaskan Way Viaduct will not be "out of service." As described in the EA, detours will be provided throughout construction for both directions of traffic, with some brief night and weekend closures. Travel speeds will be reduced, but two lanes will be kept open and the essential transportation function will be retained.

I-011-004

As described on pages 26 and 27 of the EA, a retrofit or rebuild would not provide a long-term, cost-effective alternative. The south portion of the viaduct structure is seismically deficient, at the end of its design life, and does not meet current design standards.

From: [Jerry Malmo](#)
To: [NW South Viaduct EA](#)
CC:
Subject:
Date: Monday, July 28, 2008 6:48:19 AM
Attachments:

I-012-001 I recently read about a proposed new \$545-million intersection to replace part of the Alaskan Way Viaduct that would permanently remove more than 1,200 parking spaces between South Holgate and King Streets and subject the neighborhood to construction work and traffic disruptions for more than four years.

I have to ask why the state is spending any money on this project. The Viaduct needs to be torn down and permanently removed. The decisions we make in the next year regarding this street will impact generations. You need to think smart and long term. Give the waterfront back to the residents of Seattle. Do not replace the viaduct, do not go forward with any more repairs, do not build a south intersection, do not replace any part of the Viaduct!

Department of Transportation, Attn: Angela Freudenstein, 999 Third Ave., Suite 2424, Seattle, WA 98104

Jerry Malmo
619 Federal Ave East
Seattle, WA 98102

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<http://www.iolo.com>

I-012-001

Your comments, including your preference that no action be taken to replace the viaduct between S. Holgate and S. King Streets, and that the viaduct be permanently demolished and not replaced, are noted and acknowledged here.

However, it should be noted that the intersection improvements at S. Atlantic Street would improve freight connections to the Port's container terminal, T-46, by eliminating east-west delays on surface streets caused by rail movements throughout the day. Additionally, this project has been designed to be compatible with any feasible scenario being put forth for the central waterfront.

From: [RONALD A MARSHALL](#)
To: [NW South Viaduct EA](#)
CC:
Subject: South End Environmental Assessment
Date: Sunday, July 06, 2008 8:01:15 PM
Attachments:

I-013-001 My major concern since we both are retired and don't daily commute is the congestion that is certain to happen once all this construction begins. We live in the SW corner of West Seattle near the Fauntleroy Ferry Dock. How are we going to get to the hospital in a timely matter if we should have a medical emergency? The congestion on the Spokane St. Viaduct alone is sure to be choked. Unless you can solve this problem, people are going to die on their way to the hospital. Does the State DOT and Seadot want to have that blood on their hands or do they even care?
Ron Marshall

I-013-001

As noted in the Public Services and Utilities Technical Memorandum attached to the Environmental Assessment, emergency service routes will be accommodated during construction. The project has coordinated with Seattle's police and fire departments, as well as emergency medical response providers, during the design process and will continue to coordinate with the City to ensure that emergency medical response providers are aware of any temporary detour routes during construction and can maintain timely access to the city's hospitals.

From: [Carole McCarthy](#)
To: [NW South Viaduct EA](#)
CC:
Subject: Public Hearing Comment
Date: Monday, July 07, 2008 1:43:25 PM
Attachments:

I-014-001

Your photo of the viaduct at the top of the notice you sent says it all. It is an ugly eyesore. Worse it is too close to surrounding buildings creating a terrible noise where people work and live . I urge you to please keep whatever design that you choose away from our homes. The huge number of us who rent and own homes in multiple dwellings downtown provide a major tax base and income to Seattle's coffers. We are not all rich people in pricey condo's who can insulate themselves from the ugliness and noise of a major highway ripping through our neighborhood. Many of us are students, low income housing dwellers, and service workers. Most of us walk or bike to work - thereby cutting highway congestion and fuel emissions. Please respect our downtown neighborhoods, our lifestyle and the healthy contribution residents in the downtown core make to our city. Choose a design that doesn't insult our eyes, our ears, and our lungs. Choose a design that is livable.
Carole McCarthy
Resident near Battery Street tunnel.

I-014-001

SR 99 will primarily be located in the existing viaduct footprint and to the west of the existing structure in the S. Holgate Street to S. King Street Viaduct Replacement Project. Alaskan Way S. will be relocated east of SR 99 between S. Atlantic Street and S. King Street. With this project, noise levels are expected to remain the same or decrease by 1 to 2 dBA.

The State of Washington, King County, and the City of Seattle are working together to find a solution for the central waterfront section of the viaduct. However, the Environmental Assessment for the S. Holgate Street to S. King Street Viaduct Replacement Project does not address the scenarios being evaluated for the central waterfront. Comments on the central waterfront project have been shared with the central waterfront team, and any future comments can be submitted to viaduct@wsdot.wa.gov.



South Holgate Street to South King Street Viaduct Replacement Project Comment Form

The Federal Highway Administration (FHWA) and the Washington State Department of Transportation (WSDOT) welcome your comments on the environmental assessment for the South Holgate Street to South King Street Viaduct Replacement Project. Please respond to the below questions and drop them in a comment box, or return to the address listed on the other side. To be considered as part of the official hearing period, comments must be postmarked by Aug. 11, 2008.

WSDOT studied a number of factors during the environmental assessment process, such as transportation, land use, visual quality and air quality. Do you have comments on any of our findings?

I-015-001

I appreciate the double wide elevated option (reduces traffic noise but maintains all the benefits of a the elevated we have now and level)

I also appreciate the idea that you will build 1 side & then the other to allow all the traffic to continue using it during construction.

Do you have any additional comments on the environmental assessment?

I am upset that this first phase which has an elevated section going north is being shown as dropping down to ground level at Royal Brougham - I want it to stay elevated! - because I also want the city waterfront to be elevated (efficient, separate from cars, speedy, beautiful views!)

I-015-002

I don't see that a lot of drivers will take the 4th ave exit off the Spokane Bridge after you put it on. I'd rather have had you build access an elevated over the railroad

I-015-001

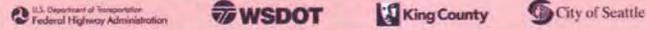
Thank you for your comments. The at-grade section of the alignment north of S. Royal Brougham Way will allow the S. Holgate Street to S. King Street Viaduct Replacement Project to connect to the solution that is chosen in the central waterfront. WSDOT, King County, and the City of Seattle are currently working together and with the public to analyze solutions for the waterfront.

I-015-002

The Fourth Avenue S. loop ramp is part of the City of Seattle's Spokane Street Viaduct Project. This ramp will provide eastbound drivers direct access to downtown Seattle via Fourth Avenue S. This access will be critical during the replacement of the Alaskan Way Viaduct, when SR 99 northbound is inaccessible from West Seattle. When the Spokane Street Viaduct becomes congested due to back-ups on I-5, this new ramp will also allow drivers to exit onto surface streets.

The City of Seattle is building the S. Lander Street Grade Separation Project as part of the Bridging the Gap program. This project is currently scheduled to begin construction in mid-2009 and will take approximately 2 years to complete.

Alaskan Way Viaduct & Seawall Replacement Program | Moving Forward



Would you like to be added to the viaduct program e-mail list for monthly updates?

Yes No

Name: Dr. S. Price Organization (optional): _____

E-mail: jasprice@isomedia.org ↔ *I might be on your list already*

Zip: 98106

How did you hear about the public hearing?

- Newspaper
- Postcard
- Legal Notice
- Monthly viaduct e-mail updates
- Word of mouth
- Other *T.V. news today*

Visit the program Web site for more information: www.alaskanwayviaduct.org

E-mail your comments on the environmental assessment to:

SouthViaductEA@wsdot.wa.gov

Additional Comments:

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Postage

Washington State Department of Transportation
Attn: Angela Freudenstein
999 Third AVE Suite 2424
Seattle, WA 98104

From: [Marjorie Rerucha](#)
To: [NW South Viaduct EA](#)
CC:
Subject: viaduct replacement
Date: Friday, June 20, 2008 9:06:29 AM
Attachments:

I-016-001 | Gentlemen: I am in favor of either reinforcing our present viaduct, or replacing it with another viaduct. I will try to attend the meeting at Madison Middle School on July 15. Thank you for your update.
Marjorie Rerucha, 4118 - 35th Ave. S.W., Seattle 98126.
e-mail: mrerucha@yahoo.com

I-016-001

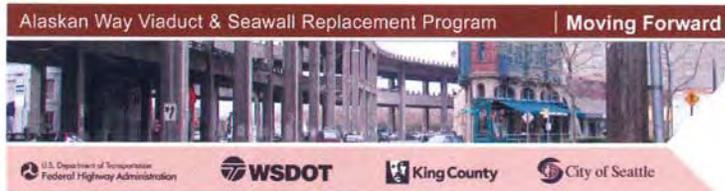
WSDOT has found that the retrofit alternative is not a fiscally responsible alternative and would not bring the structure up to current safety standards. A recent independent consultant evaluation^{1, 2} also found that the retrofit is not technically or fiscally prudent. The executive summary from the Independent Consultant Retrofit Report can be found on the WSDOT website under the Stakeholder Advisory Committee - July 24, 2008 section: <http://www.wsdot.wa.gov/Projects/Viaduct/library-meetingmaterials.htm>.

According to WSDOT estimates, the retrofit scheme proposed by the Viaduct Preservation Group would cost approximately 80 percent of the cost of replacing the viaduct. A retrofitted structure would still have inadequate lane widths, no emergency shoulders, and substandard acceleration and deceleration lanes, along with a level of seismic safety risk that is well beyond current standards. Construction of any of the retrofit schemes proposed to date would result in significant and long-term disruptions to traffic both on and around the viaduct.

The State of Washington, King County, and the City of Seattle are working together to find a solution for the central waterfront section of the viaduct. However, the Environmental Assessment for the S. Holgate Street to S. King Street Viaduct Replacement Project does not address the options being evaluated for the central waterfront. Comments on the central waterfront project have been shared with the central waterfront team, and any future comments can be submitted to viaduct@wsdot.wa.gov.

¹ KPFF Consulting Engineers. 2008a. Executive Summary - Evaluation of Seismic Retrofit Options for the Alaskan Way Viaduct presented to the Stakeholders Advisory Committee Briefing on July 17, 2008, by Andrew W. Taylor, Ph.D., SE, FACI.

² KPFF Consulting Engineers. 2008b. Evaluation of Seismic Retrofit Options for the Alaskan Way Viaduct Final Report. September 25, 2008.



South Holgate Street to South King Street Viaduct Replacement Project Comment Form

The Federal Highway Administration (FHWA) and the Washington State Department of Transportation (WSDOT) welcome your comments on the environmental assessment for the South Holgate Street to South King Street Viaduct Replacement Project. Please respond to the below questions and drop them in a comment box, or return to the address listed on the other side. To be considered as part of the official hearing period, comments must be postmarked by Aug. 11, 2008.

WSDOT studied a number of factors during the environmental assessment process, such as transportation, land use, visual quality and air quality. Do you have comments on any of our findings?

I-017-001

TRANSPORTATION: ADDITIONAL TRAFFIC MITIGATION WILL BE NEEDED DURING CONSTRUCTION ON THE SOUTH END PROJECT AND CONCURRENT CONSTRUCTION OF SPOKANE ST. WIDENING PROJECT. THIS IS PARTICULARLY IMPORTANT TO WEST SEATTLE RESIDENTS AND BUSINESSES. ADDITIONAL AND ENHANCED WATER TAXI SERVICE WOULD HELP TO ACCOMMODATE THIS. PLANS SHOULD BEGIN ASAP, THE BOAT AND SHUTTLES ARE BEING OVERWHELMED NOW.

Do you have any additional comments on the environmental assessment?

I-017-001

Exhibit 4-20 of the EA summarizes projects that are proposed to help keep traffic moving during construction of this project and other elements of the overall program. Water taxi service from West Seattle is not included. However, additional transit service will be receiving funding under this program. King County Metro and WSDOT have been working together to decide which services will receive increased funding. They have determined that a focus on buses and bus service hours is the best use of the available funding at this point in time.

Alaskan Way Viaduct & Seawall Replacement Program | Moving Forward



Would you like to be added to the viaduct program e-mail list for monthly updates?

Yes No
Name: DENNIS ROSS Organization (optional): Admiral P.C.
E-mail: DENNIS@MYWAY.COM
Zip: 98116

How did you hear about the public hearing?

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Monthly viaduct e-mail updates Word of mouth Other

Visit the program Web site for more information: www.alaskanwayviaduct.org

E-mail your comments on the environmental assessment to:

SouthViaductEA@wsdot.wa.gov

Additional Comments:

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First class
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Washington State Department of Transportation
Attn: Angela Freudenstein
999 Third AVE Suite 2424
Seattle, WA 98104

From: [Barbara Simpson](#)
To: [NW South Viaduct EA](#)
CC:
Subject: Environmental Assessment comments
Date: Friday, August 08, 2008 3:32:11 PM
Attachments: [EA2AlternativeDevelopment.pdf](#)

To Whom it May Concern,

I am writing to include my comment as part of the public record for the the SR 99 South Holgate Street to South King Street Viaduct Replacement Project Environmental Assessment.

I-018-001 In Chapter 2 - Alternatives Development, the written description of the project includes the statement: "SR 99 would return to grade for a short distance north of S. Royal Brougham Way. SR 99 would then transition to a stacked, aerial structure to match the existing viaduct at about S. King Street."

I do not agree with the inclusion of the proposed stacked, aerial structure and ramps, north of S. Royal Brougham and connecting with the existing viaduct structure at S. King Street as a part of the project. I request that the north limit and extent of the proposed project be the north side of S. Royal Brougham and that the work extents be limited to only those proposed improvements south of S. Royal Brougham.

The proposed work north of S. Royal Brougham does not reasonably allow for, nor is compatible with, any of the proposed alternatives for replacement of the central portion of the Alaskan Way Viaduct, with the exception of the rebuild alternative. The proposed work north of S. Royal Brougham and south of S. King Street would need to be demolished to allow for optimal surface and tunnel viaduct replacement alternatives, unfairly increasing costs for those alternatives by increasing their respective demolition costs. In addition, the proposed work north of S. Royal Brougham negatively impacts the overall goal to replace the viaduct by reducing the overall \$2.8 billion project funding with no value added with respect to surface and tunnel alternatives.

And finally, the stated time frame, to complete the proposed work by 2012, would result in the proposed new portion of stacked structure and ramps opening at S. King Street within the same year that the remaining SR 99 viaduct northward is slated for removal. This equates to less than one year of use for these proposed structures. This short time frame for use of these structures is not worth the expenditure of taxpayers dollars.

Sincerely,
Barbara Simpson
6738 21st Avenue NW
Seattle, WA 98117
Tel: (425) 450-2567

I-018-001

The portion of this project north of about S. Royal Brougham Way, where SR 99 rises from at-grade to match the existing structure, was carefully designed to be generally compatible with central waterfront scenarios before being included. Because transportation systems must be linked together to function, it is quite common for some part of an improvement to be a transition that matches up with the adjacent part of the overall facility. In this case, the transitional portion is more visible than most other projects, but the relative cost is well within the normal range and will not influence a decision on the central waterfront.

-----Original Message-----

From: Arthur M. Skolnik [<mailto:ArthurMSkolnik@comcast.net>]

Sent: Sunday, August 10, 2008 5:17 PM

To: Alaskan Way Viaduct

Subject: Nomination Form.doc

I-019-001

The e-mail is related to my comments on the Alaskan way Viaduct and the proposed demolition of the southern 40% of the elevated section. The section of the environmental documents prepared by WSDOT are grossly inadequate on the subject of the historical significance of the AWV. I am sending to you my recently submitted National Register of Historical Places for its inclusion in the comments and addressing in the final or supplemental documents. I expect the complete form to be included. Additional sections of the Nomination form are to follow.

Sincerely,

Arthur M. Skolnik FAIA

*** eSafe1 scanned this email for malicious content ***

*** IMPORTANT: Do not open attachments from unrecognized senders ***

I-019-001

The documents you attached to your comments (the nomination form) are printed in full in this document. Please refer to Chapters 1, 2, and 3 of the Historic Resources Section 106 Technical Report in support of the Environmental Assessment. Section 1.2 of this report discusses the viaduct as eligible for listing in the NRHP. The viaduct is also included in the project's Area of Potential Effects (APE) as shown in Chapter 2, Exhibit 2-1 as a landmark facility that is eligible for listing in the NRHP.

United States Department of the Interior
National Park Service

National Register of Historic Places Continuation Sheet -

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Narrative Description

The concrete-and-steel Alaskan Way Viaduct is one of only two through routes carrying north-south traffic around downtown Seattle. The viaduct begins just south of South Holgate Street and extends north to the south portal of the Battery Street Tunnel. It is located west of Interstate Route 5 (I-5), between downtown Seattle and Elliott Bay. Just to the east are the Pioneer Square historic district, two professional sport stadiums, and Seattle's Pike Place Market. To the immediate west is the Seattle waterfront, with the Coleman Dock ferry terminal and wharves lining Elliott Bay. Just to the north of Holgate Street the viaduct becomes a double-deck structure with northbound traffic on the upper deck and southbound traffic on the lower one.

At 11,156 feet in total length, the Alaskan Way Viaduct is a complex structure supported on pile foundations extending through the waterfront's random, non-structural fill and tideflat deposits to underlying dense soil. Starting at the north end, the first 0.4 mile of the viaduct consists of either single or separated single-deck structures carrying the northbound and southbound lanes. Near Pike Place Market, the viaduct then transitions to a double-deck cross-section, with the southbound lanes on the lower deck and the northbound lanes on the upper deck. This configuration extends to the south for about 1.5 miles. In the southerly 0.2 mile, the viaduct reverts to a single structure carrying the northbound lanes, as the alignment of the southbound lanes moves to the west, from their location under the northbound lanes, to a new alignment. At several locations along the length of the viaduct, ramps are provided for local access.

The northerly 1,650 feet of the viaduct is carried by a series of three-span units of continuous reinforced concrete t-beam spans, each from 30 to 40 feet in length. Pier supports are multiple concrete columns on individual pile-supported footings. At this point four wide-flange steel girder spans, varying in length with a maximum span of 65 feet, support a reinforced concrete roadway slab over the railroad tracks below. Piers for these spans are transversely braced steel columns supported on individual concrete pedestals resting on pile-supported footings. The viaduct continues to the south with another series of three-span units of continuous reinforced concrete t-beam spans. The spans rest on multiple concrete columns resting on individual pile-supported footings, until the structure begins its transition into a double-deck configuration.

The one and one-half miles of double-deck structure have two similar yet different configurations, related to the origin of their design either by the city or the state. The basic configuration is a series of continuous three-span units, having spans in the range of 60 to 75 feet, with a unit length of 180 to 225 feet. Supporting piers are concrete frames, with either square or rectangular columns on each side of the roadway, and deep crossbeams at the top of the columns and below the lower roadway. The primary longitudinal supports for the spans are 7-foot-deep by 1 foot 7-1/2 inch-wide exterior girders rigidly connected to the pier columns.

The double-deck portions of the bridge designed by the Washington State Department of Transportation provide four or five smaller longitudinal beams equally spaced between the exterior girders. These beams are supported on concrete crossbeams at each pier and by floor beams located at the third points within each span. This system supports the reinforced concrete roadway slab and traffic above. The double-deck spans designed by the City of Seattle's Engineering Department are similar except that three longitudinal beams are provided between the exterior girders: a shallow beam at the center and two deep beams, haunched at the pier crossbeam at the quarter points between exterior girders. All pier frame columns are supported on individual footings founded on deep piles. Along the length of the double-deck portion, pier frames have been extended as outriggers where needed to accommodate ramps, roadway transitions or obstacles in the landscape below.

To the south of the double-deck spans the state-designed longitudinal supporting system continues for the northbound lanes with two four-span continuous units, while the southbound lanes shift to the west from below the northbound lanes to a separate ground-level alignment. The northbound lanes continue for an additional 454 feet as

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an elevated structure on a series of 15 short, reinforced concrete, pile-supported slab spans enclosed within side walls, and end with an at-grade abutment support.

Integrity

The viaduct has retained all of its structural integrity since the first unit was opened to traffic in 1953. The magnitude 6.8 Nisqually earthquake of 2001 caused settlement of the supporting earth and structural damage to one column near the Colman ferry dock, requiring monitoring. That column was repaired in 2008.

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Narrative Statement of Significance

The Alaskan Way Viaduct is eligible for listing in the National Register of Historic Places under Criterion A for its association with bridge building in Washington in the 1950s. Also noteworthy is the association that the structure has had in the long history and development of the Seattle waterfront to the west, and of the Pioneer Square Historic District to the east. It also is eligible under Criterion C for its type, period, materials and methods of construction.

The significant engineering feature of the Alaskan Way Viaduct is its one-and-a-half mile long double-deck configuration. This was the first double-deck bridge constructed in Washington state and is the only bridge in the state with its particular concrete double-deck multi-span design configuration. The double-deck portion of the viaduct has two separate designs. The northerly section was designed by the City of Seattle, while the southerly section was designed by the Washington State Department of Highways. In their designs the two agencies selected different member geometrics and reinforcement details.

Historic Context

Seattle's waterfront always has been of primary importance to the community. It was along this waterfront, nearly 150 years ago, that the first homes and business enterprises of a new village huddled. As the village grew, the waterfront developed in a scattered and irregular fashion. This created a complex problem for those attending the Constitutional Convention in 1888-89 to frame a constitution for the new state of Washington. The convention declared that all lands over which the tide ebbed and flowed and all lands up to high water within the banks of all navigable rivers and lakes belonged to the state. Further stipulations included that the state had jurisdiction over the waterfronts of all incorporated cities and towns.¹

As a result, in 1890 the Washington State Harbor Line Commission was set up "to locate and establish harbor lines in the navigable waters of all harbors, estuaries, bays, and inlets of this state, wherever such navigable waters lie within or in front of the corporate limits of any city, or within one mile thereof upon either side."²

The commission soon surveyed and established the City of Seattle's harbor lines. R.H. Thompson, city engineer at the time, ruled that all wharves and piers should be erected along straight parallel lines, extending from southeast to northwest, affording vessels a direct course from the entrance of Elliott Bay to alongside each dock. Reconstruction of many wharves and piers was required, drawing angry protests from dock owners. Thus, thanks to the foresight of those early lawmakers and engineers, Seattle's waterfront had its first facelift with the orderly alignment of its piers and wharves.

By 1913, as the young city expanded and grew, the waterfront spread further along the bay both north and south, and a sea wall was built from Madison Street south to Yesler. From 1935 to 1938, the sea wall was extended north from Madison to Bay Street, at a cost of \$3 million. This was a lot of money for its day where top pay was \$1.20 per hour. All work was done by labor hired directly from the city engineer's office. No contractors were

¹ Kay Conger, "Alaskan Way Viaduct Opened to Traffic," Washington State Department of Highways, Highway

News, Vol. 2, Number 11, May 1953, 2-4.

² Washington State Constitution, Article XV, Section 1

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involved in this work. The sea wall project included placing random, non-structural fill into the area between the wall and the road. Prior to this construction, the area between the road called Alaskan Way and the docks had nothing more than planking laid over pilings.³

The conception of the Alaskan Way Viaduct has been credited to J.W.A. Bollong, the city's first traffic engineer. Bollong designed the first electrically controlled traffic signal in Seattle, installed at Fourth Avenue South and South Jackson Street on April 1, 1924. After visiting several cities and studying their solutions to traffic congestion, Bollong recommended to Mayor Bertha Landes (1926-28) that Railroad Avenue be redeveloped into a double-deck elevated highway. In his proposal, the bottom deck would be dedicated to the movement of freight and business between the city and the piers, while the upper level would be split between traffic and parking. As Bollong envisioned it, the double-decked elevated highway, which would begin north of King Street, would connect with the Pacific Highway via First Avenue South and East Marginal Way, and its north end would join Battery Street.⁴

The next city engineer, Chester Morse, shared Bollong's vision and in the spring of 1927 described the double-decked highway as running from Yesler to Stewart and then continuing northeast to First Avenue at Battery Street. Morse and the Seattle City Council were asked by the Associated Central Business Properties, Inc., to study the plan for the elevated roadway as a way to connect the Pacific Highway between Everett and Tacoma, and more importantly, to relieve congestion in Seattle's central business district by removing "nuisance traffic," heavy haul trucks and delivery cars. The project was estimated to cost approximately \$626,000 for construction and less than \$400,000 in right-of-way acquisition from Stewart Street to First and Blanchard.⁵ The financial difficulties of the Depression necessitated putting the proposed project on a back burner once again.

In 1934, Ray M. Murray, then an engineer employed by the State Department of Highways, laid out a proposed route on a Shell Oil Company map. Murray had earlier guided the Aurora Bridge through its location, design and construction, as well as the development of Aurora Avenue as the route of Primary State Highway 1 in Seattle.⁶ His route was very similar to the route proposed by Chester Morse. Later in that decade, V.C. Cousins, then Seattle Traffic and Safety Council chairman, cited the viaduct idea as a way to divert non-stop traffic around the central business district.⁷

The idea of the double-decker bypass never went away as the traffic congestion in the city grew worse with each passing year. According to a 1938 traffic survey, in a 12-hour period more than 210,000 vehicles entered and

³ Conger 2-5.

⁴ Paul Dorpat, Seattle Waterfront - An Illustrated History (Seattle: June 2005) 209

⁵ Dorpat 210-211, Figure 408.

⁶ P.C. Leonard, "The Inside Story of the Alaskan Way Viaduct and Other Tales," Highway News, Washington State

Department of Highways, May 1953: 4-5.

⁷ Dorpat 211.

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left the city west of Eighth Avenue between Jackson Street and Lenora Street. The numbers indicated a significant increase in traffic since 1922 and a need to ease congestion within the city.⁸

Finally, in 1945 Mayor William F. Devin called for construction of a six-lane concrete and steel viaduct over Alaskan Way to facilitate north-south travel through the city. The proposed solution was studied, and the resulting origin-destination traffic survey, published in 1947, recommended construction of not only the Alaskan Way Viaduct but a second large north-south expressway. Architect Joshua H. Vogel supported the idea of the viaduct as a scenic route that would attract tourists.⁹

In 1946, engineer Murray was loaned by the State Highway Department to the City of Seattle Engineering Department as a design consultant, and the project was underway. It is interesting to note that the final route of the Viaduct bore a striking resemblance to the route laid out by Morse in 1927 and Murray in 1934. Only the northern tunnel terminus had changed, from Wall Street on the 1934 map to the selected site at Battery Street. Also noteworthy is the fact that this project had no organized opposition. Citizens and government officials agreed that this was the route to take through the city.¹⁰

In keeping with the urban highway design practices of the time, the Viaduct was designed as a by-pass route to channel traffic flow around the city's downtown rather than into it. Seattle's constricted hourglass shape and the flow of traffic between the northern suburbs and the southern industrial area further supported this objective.¹¹ In fact, the Viaduct became the primary north-south corridor through Seattle prior to the opening of Interstate 5 in the late 1960s.

The Viaduct follows the route of numerous railroad lines that once ran along the Seattle waterfront. Railroad interests monopolized the waterfront soon after the town was established. Although passenger traffic came and went through railroad stations in the hearts of Seattle, eventually settling into the southern edge of the commercial district, Railroad Avenue was the primary artery for freight traffic. After World War II, as Seattleites relied less and less on the railroads, the tracks on Railroad Avenue had relatively little traffic. They became bleak and dirty reminders of another transportation age, and occupied premium space for a streamlined corridor for automobiles.¹² During the heyday of rail, the railroad tracks were obstacles to pedestrian access to the waterfront; the Viaduct's above-grade design enabled people to walk under the structure to access the waterfront, without an interruption in traffic flow.

⁸ Myra L. Phelps, *Public Works in Seattle, A Narrative History, The Engineering Department 1875-1975* (Seattle: Kingsport Press, 1978) 112.

⁹ Dorpat 211.

¹⁰ Leonard 4-5.

¹¹ Phelps 112.

¹² Heather M. MacIntosh, "First stage of Seattle's Alaskan Way Viaduct is completed on April 4, 1953."

[HistoryLink.org Essay 1691](http://www.historylink.org/essays/output.cfm?file_id=1691), 29 September 1999, 7 August 2008 <http://www.historylink.org/essays/output.cfm?file_id=1691>

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The multi-million dollar project was funded by the Bureau of Public Roads, the State Highway Department, and the City of Seattle. Much of the City of Seattle's cost covered design work, right-of-way acquisition and engineering costs.¹³ Because of the length of the project, design and construction were divided into three sections, called schedules B through D. The schedules were as follows:

Schedule B: Project extending from Battery Street south to Pike Street, designed by the Seattle City Engineering Department, Ralph W. Finke, City Engineer.

Schedule C: Project extending from Pike Street south to King Street, designed by The Seattle City Engineering Department, Ralph W. Finke, City Engineer.

Schedule D: Project extending from King Street to Railroad Way, designed by the Bridge Division of the State Department of Highways, George Stevens, Chief Bridge Engineer.

All contracts were to be advertised, awarded and administered by the State Department of Highways.

There also was a Schedule A, a tunnel to connect the double-decked highway to Aurora Avenue to the north, a project that was completed in July 1954. This provided a direct connection between the completed portions of the Viaduct on the south and State Route 99 (Aurora Avenue) to the north, affording much relief to cross-town traffic.

On December 28, 1949, the construction phase of the project began when a contract for Schedule B work was awarded to MacRae Brothers of Seattle for a cost of \$1.194 million. Work on this contract was complete on July 26, 1951. A contract for Schedule C work had been awarded on January 16, 1951, to Morrison-Knudsen Company of Seattle for a cost of \$3.691 million. As work progressed on that part of the project, a contract was awarded on November 14, 1951, to MacRae Brothers of Seattle for construction of Schedule D for \$1.064 million.¹⁴

By the summer of 1952, work on the Schedule C project was complete. Opening for traffic also was ahead of schedule. Spectators were allowed on this double-deck portion of the Viaduct during the week of Seafair, Seattle's annual festival. Traffic was limited to pedestrians only. The upper deck, elevated 60 feet above the ground, offered an excellent view of the waterfront festivities and gave Seattleites a preview of the impressive structure built with their tax dollars.¹⁵

Contract work on the three projects had been completed and they were opened to local traffic on April 5, 1953. This portion was constructed for a total cost of \$5,987,000.

The opening ceremony celebration on April 4, 1953, was held on the northern end of the viaduct, behind the 116th Regiment Armory. The event featured performances by an orchestra supplied by waterfront restaurateur Ivar Haglund, dancing girls, and the Seattle Police Department color guard and drill team, and speeches by many dignitaries. Business leader D.K. MacDonald served as master of ceremonies. Mayor Allan Pomeroy cut the

¹³ Phelps 113.

¹⁴ Washington State Highway Contract Listing, 1949 to 1956.

¹⁵ Bill Lee, "Project Progress," Highway News, Washington State Department of Highways, September 1952: 8.

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ceremonial ribbon with the aid of MacDonald and reigning Seafair Queen Iris Adams.¹⁶ The speed limit on the Viaduct was set at 45 miles per hour, with a 30 mile per hour limit set for the access ramps. From the moment that Seattle officials enthusiastically snipped the ceremonial ribbon, it took all of 18 minutes for the new roadway to experience "one of the worst traffic jams in Seattle history." At both ends of the Viaduct, cars were bumper to bumper, with the curious eager to test the double-deck waterfront thoroughfare.¹⁷ The following day the Seattle Post-Intelligencer reported: "The viaduct looms like a royal necklace across the bosom of the Queen City of the Pacific Northwest."¹⁸

Although the Schedule D project had provided a ramp at its southerly end connecting it to existing 1st Avenue South, the double-deck viaduct now terminated with a stub end at Railroad Way. By the end of 1954, the Bridge Division of the State Department of Highways had begun preparation of design plans for the southerly stretch of the Viaduct - from Railroad Way to just south of Holgate Street. This portion was to be let in two separate contracts. The state's chief bridge engineer, George Stevens, approved design plans for the first contract, the northerly 0.2-mile of the remainder of the project, on August 25, 1955. On October 5, 1955, the contract was awarded to Rumsey and Company from Seattle for a cost of \$728,000.

The final plans for the remainder of the Viaduct were approved on March 27, 1956. The work was awarded for construction to a joint venture of Morrison-Knudsen Company and Rumsey and Company on June 20, 1956, for a cost of \$2.827 million. The northerly 0.2 mile of the remaining work was completed by Rumsey on November 15, 1956. Morrison-Knudsen and Rumsey finished the south end of the project on August 26, 1958.¹⁹

The final extension of the project was opened on Thursday, September 3, 1959, in ceremonies held on the West Spokane Street overpass. There was a band, dignitaries, and the reigning Seafair Queen, Diane Gray, cut the ceremonial ribbon. The ceremonial first car on the extension, a white 1908 Buick convertible, was followed along the new extension by six more antique cars. At a luncheon following the event, William A. Bugge, state highway director, was named 1959 "Motorist Man of the Year" for his years of leadership in Washington state, including supervising the building of the Alaskan Way Viaduct, the Tacoma Narrows Bridge and other notable projects.²⁰

The opening of the last segment of the Viaduct marked the completion of the international West Coast Highway, linking Canada, the United States and Mexico.

¹⁶ Phil Dougherty, "Final phase of Seattle's Alaskan Way Viaduct opens to traffic on September 3, 1959."

HistoryLink.org Essay 8127, 1 April 2007, 3 August 2008 <http://www.historylink.org/essays/output.cfm?file_id=8127>

¹⁷ "Special Reports - Footnotes to the Decade 1950-1960," 3 December 1999, 7 August 2008

<<http://seattlepi.nwsource.com/century/not203.shtml>>

¹⁸ Dougherty

¹⁹ *Twenty-Seventh Biennial Report 1956-58*. Washington State Highway Commission, 124-125.

²⁰ Dougherty

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The designers of the viaduct had included provisions for four future access ramps. By the 1960s, the desire for a route to bypass the central business district had shifted to a need for an expressway serving the downtown core. Eventually, two downtown access ramps were added – in 1961, an “off” ramp at Seneca Street and in 1966, an “on” ramp at Columbia Street. Funding for both ramps came from a 1960 bond issue and from 1954 arterial bonds. The other two access ramps never were built, although the stubbed-out access points remain to this day.²¹

Throughout its history the Viaduct has supported Seattle’s waterfront industries. Its construction and unique design did not adversely affect the working wharves to its west. As a north-south connector from Ballard to Boeing Field, the viaduct has been a critical link in transporting marine fuel from the depots in the south end to the fishing fleet at Ballard’s Fisherman’s Terminal and in rushing freshly caught seafood from the terminal to market.

Since its construction, the Viaduct has experienced two major earthquakes firsthand: the 1965 magnitude 6.5 Seattle earthquake, centered some 15 miles from the viaduct, and the 2001 magnitude 6.8 Nisqually earthquake, centered slightly more than 50 miles to the south. Prior to construction of the Viaduct the area experienced a 7.2 magnitude earthquake centered in Olympia, 60 miles to the south, in 1949. Liquefaction damage recorded in the Seattle waterfront area after the 1949 and 1965 events was relatively minor. Virtually no damage to the Viaduct was recorded following the 1965 event.

Criteria Considerations and Period of Significance

The Alaskan Way Viaduct meets the requirements for listing on the National Register in accordance with Criteria A and C. It was the only north-south expressway through Seattle at a time when automobiles were increasing in popularity and traffic congestion was increasing accordingly, and it remains one of only two north-south expressways through Seattle, handling approximately 110,000 vehicle trips per day. The reinforced concrete and steel structure has a distinctive three-span, double-deck configuration with open railing, and is unique in Washington state for its design.

The period of significance for the Alaskan Way Viaduct has been defined here as beginning in 1953, the year the first sections opened to the motoring public, and continuing through 1959, when the final extension of the Viaduct opened.

²¹ Phelps 114.

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Verbal Boundary Description

Longitudinal Boundaries: The south end of the nominated property begins at the pavement seats (Northbound and Southbound structures) just south of the Alaskan Way and S. Holgate Street intersection. The Alaskan Way Viaduct continues north to the south portal of the Battery Street Tunnel.

Lateral Boundaries: Boundaries extend to the edges of the structures.

Verbal Boundary Justification

With the exception of the two access ramps added in the 1960s, the boundaries of the elevated portions of the Alaskan Way Viaduct have been unchanged since its construction in 1953-1958.