



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, 1<sup>st</sup> 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, 3<sup>rd</sup> 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, 3<sup>rd</sup> 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, 3<sup>rd</sup> 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, 1<sup>st</sup> 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, 1<sup>st</sup> 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, 1<sup>st</sup> 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

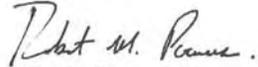
**A-003-054** | assumptions used in the analyses. Simply summarizing the results does not provide the reader enough information to evaluate.

**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.