



ALASKAN WAY/ PROMENADE/ OVERLOOK WALK

DEIS

SCOPING SUMMARY

Prepared for
Seattle Department of Transportation
City of Seattle, Washington

Draft FINAL December 2013

Prepared by
Parametrix



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ACRONYMS AND ABBREVIATIONS

BRT	bus rapid transit
DEIS	Draft Environmental Impact Statement
EIS	Environmental Impact Statement
KCDOT	King County Department of Transportation
LOS	level of service
PFD	Public Facilities District
SDOT	Seattle Department of Transportation
SEPA	State Environmental Policy Act
SHWA	Seattle Historic Waterfront Association
SPU	Seattle Public Utilities
WSDOT	Washington State Department of Transportation
WSF	Washington State Ferries Division



1. INTRODUCTION

The Seattle Department of Transportation (SDOT) is preparing an Environmental Impact Statement (EIS) for the Waterfront Seattle Project. The EIS is being prepared to comply with Washington's State Environmental Policy Act (SEPA). The first step in preparing an EIS is scoping a Draft EIS (DEIS). The purpose of DEIS scoping is to notify agencies and the public of the project and to solicit comments on project alternatives to be evaluated and environmental issues to be analyzed as part of the development of the DEIS. The comments will help to determine or refine the alternatives and the significant environment impacts that will be studied and then discussed in the DEIS.

This document describes the scoping process that was used for the project and summarizes the comments that SDOT has received. The comment summary begins with a summary of each major comment topic—Alaskan Way, local waterfront transit, impacts on the Waterfront Landings condominiums, bicycle and pedestrian facilities, and parking—, continues with summaries of agency, tribe, and community group comments, and ends with a list of other comment topic areas.



2. SCOPING PROCESS

2.1 BACKGROUND

This section describes the public scoping process, techniques used to notify the public about the opportunity to be involved in scoping, and provides a brief summary of the public scoping meeting.

The scoping comment period occurred from August 14 to September 25, 2013. During this period the public was invited to submit comments in four ways:

- Through an online comment form at waterfrontseattle.org
- By email mail to UplandEISscoping@waterfrontseattle.com
- By mail to Peter E. Hahn, Director, Seattle Department of Transportation, c/o Mark Mazzola, Environmental Manager, P.O. Box 34996, Seattle, WA 98124-4996
- By attending the public scoping meeting held on September 9, 2013

2.2 SCOPING ANNOUNCEMENTS

Initiation of the State Environmental Policy Act (SEPA) EIS process and the public scoping meeting were broadly announced in several ways including through the Washington State Department of Ecology website, legal notifications, press releases, paid advertisement in print and online media, email notifications, the Waterfront Seattle website (waterfrontseattle.org), and posters throughout Seattle.

Specifics include:

- News release to local newspapers, radio, and television stations
- Legal notifications published in print and online versions of two newspapers of record, The Seattle Times and Daily Journal of Commerce
- Print and online advertisements published in the Northwest Asian Weekly, Seattle Chinese Times (translated), and La Raza del Noroeste (translated)
- Online advertisements published in The Seattle Times, Daily Journal of Commerce and The Stranger
- Posters in 850 locations, such as local businesses and community boards

2.3 PUBLIC SCOPING MEETING

The City of Seattle hosted a public scoping meeting at Seattle City Hall on September 9, 2013. The purpose of the meeting was to provide an opportunity for the public to identify issues that should be discussed in the EIS, and to inform the public about the overall scoping process. Public scoping comments were collected through a court reporter, handwritten comment cards, and an online comment form. The notifications and meeting materials are provided in Appendix A and available on the project website's library at <http://waterfrontseattle.org/library>.



3. SUMMARY OF PUBLIC COMMENTS

3.1 OVERVIEW

The City of Seattle received over 200 comments, most of them from individuals. Table 3-1 lists the organizations that submitted comments. Copies of the comment submissions from Agencies, Tribes, Businesses, and Community Groups are provided in Appendix B.

TABLE 3-1.

Organizations that Submitted Comments

Agencies	Community, Business, and Labor Organizations	Tribes
King County Department of Transportation	Alliance for Pioneer Square	Suquamish Tribe
Port of Seattle	Cascade Bicycle Club	
Seattle Department of Neighborhoods	Feet First	
Seattle Department of Planning & Development	Puget Sound Bike Share	
Seattle Department of Neighborhoods—(Landmark Preservation Board Coordinator)	Puget Sound Partnership	
Seattle Public Utilities	Seattle Historic Waterfront Association	
Washington State Department of Transportation	Seattle Mariners	
Washington State Major League Baseball Stadium Public Facilities District	UNITE HERE Local 8	
Washington State Public Stadium Authority	Washington Trust for Historic Preservation	

Table 3-2 shows the number of commenters by method of communication.



TABLE 3-2.

Number of Scoping Comments by Source

Source	Number of Comments
Emails forwarded from UplandEISscoping@waterfront.org	50
Online comment forms	152
Court reporter transcript	4
Open House comment forms, hand written hard copies	20
	Total 226

3.2 ALASKAN WAY: WIDTH AND NUMBER OF LANES

One of the more common requests was to have an alternative for Alaskan Way with fewer lanes than was shown at the September 2013 Open House. Many commenters described the current (September 2013) design as not pedestrian-friendly, a barrier to the waterfront, a “highway” on the waterfront, and that it prioritized motor vehicles over pedestrians, bicycles, and open space. While much of the focus on narrowing the road width was at the south end of the project, many advocated for narrowing the road along its entire length. Other reasons cited were maintaining or creating a more ‘walkable’ open space, views, and attractiveness.

Many commenters requested an alternative with two lanes for vehicles, one in each direction. Others called for no more than four lanes, two in each direction, either along the entire route or north of Colman Dock only. Another suggested keeping Alaskan Way to six lanes and a total width of 66 feet.

The commenters asked that the DEIS evaluate the impacts of the current road configuration on access to and from the waterfront by pedestrians and cyclists, particularly in terms of safety. The analysis should include impacts of the project on all non-motorized transportation along and across the corridor. A few comments concerned the impacts of the roadway on greenhouse gas emissions and air quality.

Commenters suggested measures to compensate for the reduced width, especially south of Yesler Way. They include eliminating at least one of the ferry turn lanes and using demand management techniques during peak hours such as congestion pricing for ferries and online reservation systems. Another suggestion called for changing King County Metro transit routes to alternative routes outside of the south part of Alaskan Way so that dedicated transit lanes could be eliminated. One commenter asked for removal of two to three lanes plus the center median to reduce the street width. For the most part, commenters would replace the removed lanes with public open space.

One commenter suggested that the additional space could be opened to private development in order to glean tax revenues to fund other parts of the project. A few other comments requested



that none of the open space be turned over to private development. Another proposed that all signals and signage be removed to allow free movement by pedestrians, bicycles, and motor vehicles.

One commenter requested fewer lanes but also lower travel speeds to improve safety at pedestrian crossings. The commenter requested that the DEIS study how greenspace affects placemaking and humanizes the public spaces, and how it mitigates pollution from road runoff.

3.3 LOCAL WATERFRONT TRANSIT OPTIONS

Nearly all references to local waterfront transit supported one or more of the local transit alternatives. None suggested any new local transit options. Changes to the routes were not suggested although a few commenters wanted the transit alignment to connect to the First Hill Streetcar and/or to light rail. Several online commenters advocated for the return of the Benson streetcars without the modernization, as part of preserving the historic features of Seattle, and noted that the “old yellow and green” is a brand associated with the waterfront. Commenters suggested that the DEIS should consider the integration of the Madison bus rapid transit (BRT) with waterfront transit options.

3.4 WATERFRONT LANDINGS CONDOMINIUM IMPACTS

Comments for the Waterfront Landings Condominiums (Waterfront Landings) covered a variety of topics specific to the current design for the Elliott Way connector. The proposed retaining wall for Pine Street is the primary concern, particularly for residences on the south wing of the building. Concerns associated with the retaining wall included air quality (i.e., dust, fumes) and noise associated with vehicular traffic; service vehicle access; parking; safety and security; aesthetics (i.e., loss of views, natural light); and pedestrian access to Pike Place Market and downtown, especially for residents with disabilities.

Many commenters suggested that the proximity of the proposed retaining wall and road would isolate the residents, closing or “walling” them off from the waterfront. They also suggested that the closeness of traffic to the south end of the building would increase air and noise pollution and the lights from traffic would affect residents during the nighttime. Regarding safety and security, almost all commenters cited current issues with “transients,” “drug addicts,” and “vagrants,” particularly in Steinbrueck Park. They believe the addition of the Pine Street wall would create an “environment for homeless camping, drug use, and other illegal activity.”

Many of the Waterfront Landings residents were concerned with the loss of pedestrian access to Pike Place Market and downtown Seattle stating it would be especially difficult for the elderly and disabled. Several commenters stated that the elderly and disabled residents use the elevators in the Pike Place Garage to reach the Pike Place Market, which would no longer be accessible under the current design.



Many residents were concerned about access to the condominium's parking garage, loss of on-street parking for guest use, and changes to on-site circulation that would bring service vehicles closer to ground floor units.

Other comments referenced the potential decline in property values due to the proposed Elliott Way connector and proposed an alternative connection via Pike Street instead of Pine Street.

3.5 BICYCLE FACILITIES

Safety and accessibility for cyclists was a frequent topic. Perhaps the most common comment was a request for dedicated bicycle-only lanes that are physically separated from other travel ways. Safe connections to destinations such as the ferry terminal and Seattle Center were often cited, as were connections to other local and regional trails. Another common topic was the potential for conflict between cyclists and pedestrians with the proposed project, and the need for adequate signage and efficient routes for both modes. Many called for making bicycle and pedestrian facilities a priority over vehicle facilities, which were often stated in the context of requests to reduce the number of lanes on Alaskan Way.

One commenter wrote that the DEIS should “study pedestrian and bicycle safety through minimizing roadway width, vehicular speed, and pedestrian crossings. It should also disclose the environmental and human health benefits [of] creating a greenspace with pavement dedicated primarily to pedestrian and bicycle movement.”

One suggestion was for an alternative that has pavement for bicycles and pedestrians 10 times as wide as that for cars. Another suggestion was for covered bicycle parking. Three types of cyclists were noted by one commenter—through city commuters, downtown city workers, and tourists—who suggested that rental bicycles and a network of paths to Pioneer Square would be useful for tourists and ferry riders.

3.6 PEDESTRIAN FACILITIES

Many of the commenters who did not like the width of Alaskan Way cited the lack of safe connections for pedestrians crossing Alaskan Way as a reason. Many of the commuter cyclists also noted that safety for pedestrians needs to be part of the design. One suggested that there should be a portion of the waterfront where only pedestrians are allowed in order to avoid conflicts with cyclists, skateboarders, Segway riders, etc. Another stated that the street should have frequent overpasses for pedestrians.

Safe and easy access was requested from Colman Dock to downtown for ferry foot passengers, and to the north waterfront, train station, and bus tunnel. The commenter also noted that residents and tourists have different needs as pedestrians and both need to be accommodated in the waterfront project.



3.7 PARKING

Several waterfront businesses expressed concern that loss of parking would cause economic hardship to waterfront businesses and cause patronage to decline. Also represented by Graham & Dunn PC (Elaine L. Spencer), the 1201 Western building owner expressed concern about continued access to eight parking stalls on the west side of the building.

One waterfront business owner specified concerns that the removal of parking from under the viaduct will negatively affect businesses on the waterfront. The owner recommended that the current alternatives be changed to include angled parking along Alaskan Way as well as a 350-space parking garage between Seneca and Spring Streets. The owner also suggested that the DEIS evaluate impacts on public services, particularly police and security, if reduced visitor traffic (caused by a lack of parking spaces near the waterfront) attracts criminal and anti-social behavior.

3.8 AGENCY COMMENTS

Nine agencies provided comments during the scoping period. Comments generally requested detailed analysis or consideration of project components of specific concern to the commenting agency. Most agencies requested that SDOT coordinate with them as the process moves forward, both during DEIS development and during construction.

Additional analysis or consideration requested by the agencies was primarily associated with the project's potential effects to freight mobility, transit, rail, automobile traffic (including ferry queues), pedestrians, land use, economics, historic properties, and views. Most commenters were concerned with both construction and long term impacts.

Comments specific to sections of the DEIS included purpose and need, project alternatives, and cumulative effects. Several agencies requested the DEIS consider both other plans being developed in the area and other projects occurring on the waterfront. One agency asked that the DEIS be expanded to include other elements of the environment.

3.9 TRIBES

Tribal comments requested that the DEIS address the following potential impacts from the project: long-term operation and maintenance and access to tribal fishing activities; fish, wildlife, and their habitats; stormwater and water quality; and hazardous materials. Consultation was requested on the proposed interpretive displays and themes for the waterfront, recommended revegetation with native plants to enhance ecological conditions and removal of existing hazardous materials. Tribal comment also recommended consideration of the potential of new development to preclude shoreline restoration actions.



3.10 COMMUNITY, BUSINESS, AND LABOR GROUPS

Eight community, business, and labor groups commented. The topics typically were related to aspects of the project that are of specific concern to the organization.. Many of the topics are also discussed in sections 3.3 through 3.7, above.

The requests for additional analysis or consideration were primarily associated with the project's potential effects on the following: historic properties; the economy (businesses, tourism); transportation (pedestrians and bicycles, transit, traffic, parking); hazardous materials; water quality (stormwater); and public safety.

Many scoping comments were related to the proposed configuration of Alaskan Way and requested that SDOT consider fewer and/or narrower travel lanes, convertible [flex] lanes and different options for ferry queuing and transit routes to Third Avenue.

Commenters also asked that the methodology of the transportation analysis define the level of service (LOS) assumptions used to define the proposed lane configuration for Alaskan Way and describe how LOS assumptions include multi-modal LOS. The analysis of future travel demand should be detailed, specifically for short trips along the waterfront and traffic south of the project should be studied.

Many comments concentrated on pedestrian and bicycle safety. The commenters requested that SDOT evaluate urban design features and special signal phases to facilitate safe crossings of Alaskan Way by cyclists and pedestrians as well as alternatives that have a safer and more pleasant pedestrian environment than that which would be created by eight lanes south of Yesler Way. A wider cycle track than 12 feet was also proposed as an alternative.

One commenter provided detailed comments and recommendations related to potential impacts on transportation, land use, hazardous materials, water quality, and vegetation and wildlife. Another commenter recommended coordinating the timing of construction amongst the numerous projects to minimize duplication of effort and construction rerouting of traffic flows. One comment suggested that no construction occur between June and September.

3.11 OTHER TOPIC AREAS

Transit. Commenters said that the transportation analysis should include an evaluation of congestion impacts on transit if no transit-only lanes are provided. It also should include the impacts of tolling the SR 99 tunnel.

Air Quality. Commenters noted that the analysis should include impacts of cars idling while waiting for ferries. Greenhouse gas emissions from any diesel buses proposed for local waterfront transit should be evaluated and any savings in greenhouse gas emissions from the electric trolleys should be indicated in the DEIS.



Views. A few commenters said that the views of Seattle and the bay from the viaduct should be counted as important resources and the impacts of their loss evaluated.

Viaduct as Park. Two commenters said the viaduct, or a part of it, should be preserved as a park.

Arena. One individual enquired about the relationship of the scoping effort to the proposed NBA arena.

Light Impacts. Commenters noted that the analysis should look at the potential for reducing light pollution from the lights along the waterfront, as well as reducing impacts from headlights on residents of Waterfront Landings.



Appendix A

Scoping Notifications



APPENDIX A. SCOPING NOTIFICATIONS

Determination of Significance and Request for Comments (Legal Scoping Notice)
Online advertisement in Seattle Times and the Stranger
Online ad in Daily Journal of Commerce and Northwest Asian Weekly
Online advertisement in La Raza del Noroeste
Online advertisement in Seattle Chinese Times
Print advertisement in the Seattle Chinese Times
Print ad in Northwest Asian Weekly
Print ad in La Raza del Noroeste
Poster for Scoping Meeting

END OF APPENDIX

Seattle Department of Transportation
Waterfront Seattle - Alaskan Way/Promenade/Overlook Walk
SEPA Determination of Significance and Request for Comments on Scope of the
Environmental Impact Statement

Description of proposal: The proposed action would create new public open spaces and a new roadway between King Street and Battery Street with provisions for bicycle, transit, pedestrian, car and freight traffic, and parking. The proposal would be constructed primarily within existing public right-of-way, but may include some property acquisitions. The proposed new public open spaces would include a promenade adjacent to Elliott Bay from King Street to approximately Virginia Street, and a new structure providing a pedestrian connection between the Pike Place Market and the new promenade. The proposal would accommodate new local transit service along the waterfront. The proposal would also include the replacement of pedestrian bridges to the waterfront at Lenora and Marion Streets and improvements to Columbia and Seneca Streets between Alaskan Way and First Avenue. No construction in Elliott Bay would be required. Alternatives will be considered, including the configuration of the proposed roadway, promenade, and connection to the Pike Place Market.

Proponents: City of Seattle Departments of Transportation, Planning and Development, and Parks and Recreation.

Location of proposal: The project area includes streets and public spaces located along and connected to the downtown Seattle Waterfront, originating on Alaskan Way at King Street in the Pioneer Square Historic District and extending along Alaskan Way north to Pine Street. From Pine Street it would extend along a new roadway in the footprint of the existing viaduct in the Belltown District and end at Battery Street and Western Avenue.

Lead agency: City of Seattle Department of Transportation

EIS Required. The lead agency has determined this proposal is likely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c) and will be prepared. The lead agency has identified preliminarily the following elements of the environment for potential discussion in the EIS.

Transportation

The proposal would substantially change the existing transportation network of Seattle's waterfront. It would affect operations and safety for vehicular traffic, transit, freight, bicycles, and pedestrians; parking and loading zones; and access to piers, Colman Dock, Pike Place Market, and other locations along the waterfront.

Land Use

The proposal would intersect a variety of land uses including retail, commercial, office, recreation, hotel, government, and residential uses. Construction of new public open space and new roadways could indirectly affect the type and density of development along the waterfront compared to existing conditions.

Historic and Archaeological Resources

There are numerous historic properties in the vicinity of the proposed project including, but not limited to, the Pike Place Market and Pioneer Square Historical Districts, both listed in the National Register of Historic Places; and multiple individual structures eligible for or listed on the National Register of Historic Places or as City of Seattle landmarks. The project vicinity also has known potential for archaeological resources that could be buried beneath the existing surface streets, sidewalks, and other infrastructure.

Noise and Vibration

It is anticipated there would be construction-related noise and vibration impacts and the potential for operational noise level impacts based on changed traffic patterns and pedestrian use. Additionally, some activities in new public spaces, such as concerts, could increase sound levels on adjacent properties.

Aesthetics/ Light and Glare

Views from the project area that are protected by Seattle City Code include the Olympic Mountains, Elliott Bay, the Seattle Skyline, and Mount Rainier. Construction along the waterfront may alter the views from affected viewpoints within the project area.

Public Services and Utilities

Project components including construction of a major street, and improved and expanded public spaces, would alter the existing public service patterns along the downtown waterfront including fire, emergency medical, law enforcement, solid waste and recycling, and disaster preparedness services. Public and private utilities will also have to be relocated, expanded, and/or updated within the project area.

Hazardous Materials

Contaminated materials are present in the project area and could pose a risk to the environment or worker health and safety if appropriate BMPs and protocols are not managed properly. No contaminated materials are expected to pose a risk during operation.

Water Quality

During construction, ground disturbance and other activities could diminish the water quality causing high turbidity and suspended sediment concentrations in Elliott Bay. There is also the potential for inadvertent spills or leaks of toxic materials, or solid waste, which could potentially reach Elliott Bay. During operation, it is anticipated that all stormwater would be treated in accordance with the City of Seattle Drainage Code.

Vegetation and Wildlife

During construction, noise, vibration, and sediment movement could affect upland vegetation and wildlife, and due to the proximity to Elliott Bay, marine habitat and organisms. Operation is not expected to pose a risk to vegetation and wildlife.

Scoping: Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. Comments may be submitted by mail to the SEPA Responsible Official below. Alternatively, comments may be submitted by email to UplandEISscoping@waterfrontseattle.org, or online at waterfrontseattle.org.

A scoping meeting will be held from 4:30 PM to 6:30 PM on September 9, 2013 in the Bertha Knight Landes Room in Seattle City Hall, 600 Fourth Avenue (Between Cherry and James Street), Seattle, WA. Comments must be submitted by 5:00 PM September 25, 2013

Responsible official:

Peter E. Hahn, Director
Seattle Department of Transportation
c/o Mark Mazzola, Environmental Manager
P.O. Box 34996
Seattle, WA 98124-4996

Signature: _____

Date: 8.9.13

Peter E. Hahn, Director



Contact: Rick Sheridan, (206) 684-8540

For Immediate Release

August 16, 2013

Waterfront Seattle: Environmental Review Begins, September 9 Public Scoping Meeting Announced

SEATTLE— The Seattle Department of Transportation is preparing an Environmental Impact Statement on elements of the proposed Waterfront Seattle project including Alaskan Way, the pedestrian promenade, and the overlook walk.

A public scoping meeting will be held September 9 at Seattle City Hall, 600 Fourth Avenue, in the Bertha Knight Landes Room from 4:30 to 6:30 p.m. The meeting will be an open house format, and is free and open to all.

Scoping is the first step in the EIS process. The purpose of scoping is to seek input from the public, interest groups, agencies and affected tribes on the actions, alternatives and environmental impacts proposed to be discussed in the EIS. The scoping process is also intended to eliminate detailed study of those issues that are not significant or have been covered by prior environmental review.

The scoping comment period began August 14 and continues through September 25. In addition to the public scoping meeting, comments also may be submitted in three ways:

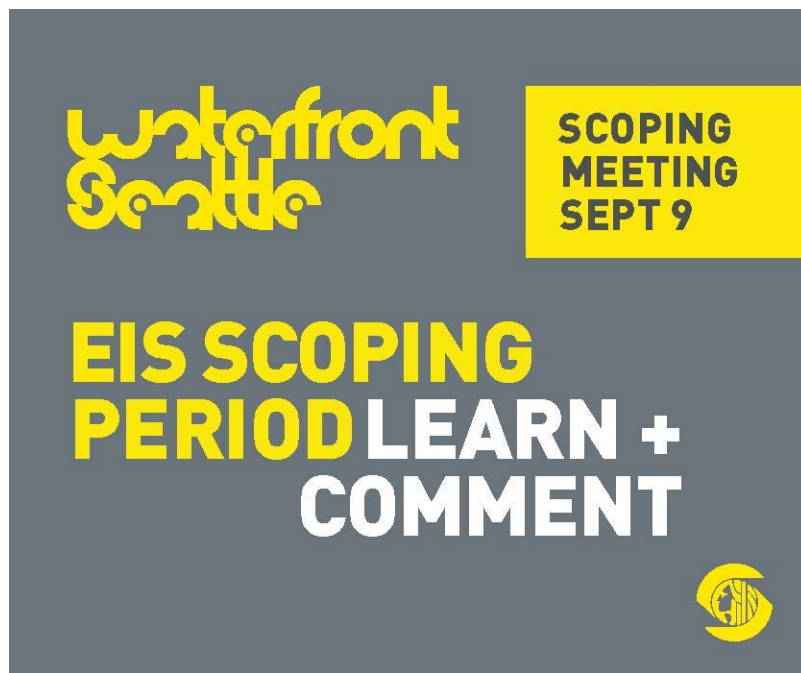
1. Online at waterfrontseattle.org
2. By email to UplandEISscoping@waterfrontseattle.org
3. In writing to: Peter E. Hahn, Director, Seattle Department of Transportation, c/o Mark Mazzola, Environmental Manager, PO Box 34996, Seattle, WA 98124-4996

Public comments must be submitted by 5:00 p.m. Wednesday, September 25.

For more information about the project and the scoping process visit waterfrontseattle.org.

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Online advertisement in Seattle Times and the Stranger



Online ad in Daily Journal of Commerce and Northwest Asian Weekly



Online advertisement in Seattle Chinese Times



環境影響報告書 評估範圍會議

星期三
九月九日

晚上4:30-6:30
西雅圖市政廳 600
FOURTH AVE

西雅圖運輸部 (SDOT) 正在為西雅圖海濱項目包括阿拉斯加大道 (Alaskan Way) , 行人長廊, 以及行人天橋, 準備編制環境影響報告書 (Environmental Impact Statement) 。

本次會議將於西雅圖市政廳 Bertha Knight Landes 會議室進行。以公開會議的形式免費對外開放, 歡迎廣大市民參與。

提出您寶貴的意見

八月十四日 — 九月二十五日

西雅圖運輸部想要了解您對環境影響報告評估範圍的想法。

所有有關環境影響報告評估範圍的意見必須在九月二十五日下午五時以前, 透過公開會議、網上、電子郵件和書面形式提交。

欲了解更多信息或提出意見, 請登上或電郵至:

waterfrontseattle.org

UplandEISscoping@waterfrontseattle.org



Print advertisement in the Seattle Chinese Times



EIS SCOPING MEETING

MONDAY,
SEPTEMBER 9 4:30-
SEATTLE 6:30 PM
CITY HALL 600
FOURTH AVE

The Seattle Department of Transportation (SDOT) is preparing an Environmental Impact Statement (EIS) on elements of the proposed Waterfront Seattle project including Alaskan Way, the pedestrian promenade, and the overlook walk.

The meeting will take place in the Bertha Knight Landes room. It will be an open house format, and is free and open to all.

SUBMIT COMMENTS AUGUST 14 - SEPTEMBER 25

SDOT would like your ideas about what should be discussed in the EIS. All scoping comments must be submitted by 5:00 p.m. Wednesday, September 25, 2013. Comments can be submitted at the public meeting, online, by email and in writing.

For more information and to submit comments:

waterfrontseattle.org

UplandEISscoping@waterfrontseattle.org



Print ad in Northwest Asian Weekly



**REUNIÓN DE EXPLORACIÓN
DEL ESTUDIO DE IMPACTO
AMBIENTAL (EIS)**

**LUNES, 9 DE
SEPTIEMBRE 4:30 –
SEATTLE 6:30 PM
CITY HALL 600
FOURTH AVE**

El Departamento de Transporte de Seattle (SDOT) está preparando un Estudio de Impacto Ambiental (EIS) con respecto a elementos de la propuesta del proyecto de Seattle Waterfront, incluyendo Alaskan Way, el paseo de peatones y la caminata con vista.

La reunión tendrá lugar en el aula de Bertha Knight Landes. El formato será de casa abierta y es gratis, todos son bienvenidos.

**ENTREGUE SUS
COMENTARIOS**
14 DE AGOSTO – 25 DE SEPTIEMBRE


SDOT le gustaría recibir sus ideas sobre lo que se debería discutir en la EIS.

Todos los comentarios de exploración deben ser entregados antes de las 5:00pm el miércoles, 25 de septiembre de 2013. Los comentarios pueden ser entregados en la reunión pública, en línea, por correo electrónico y por escrito.

Para más información y para entregar sus comentarios visite:
waterfrontseattle.org
UplandEISscoping@waterfrontseattle.org



Print ad in La Raza del Noroeste



**EIS SCOPING
MEETING**


**MONDAY,
SEPTEMBER 9 4:30 –
SEATTLE 6:30 PM
CITY HALL 600
FOURTH AVE**

Details at waterfrontseattle.org

SUBMIT COMMENTS
AUGUST 14 - SEPTEMBER 25

What should be discussed in the EIS?
Deadline: 5pm, September 25, 2013

Learn more and comment at:
waterfrontseattle.org



Poster for Scoping Meeting



Appendix B

Comments from Agencies, Tribes, Businesses, and Community Groups



APPENDIX B. COMMENTS FROM AGENCIES, TRIBES, BUSINESSES, AND COMMUNITY GROUPS

END OF APPENDIX



September 25, 2013

Peter Hahn, Director
City of Seattle Department of Transportation
700 Fifth Avenue
Seattle, WA 98124-4996

RE: Seattle Waterfront Environmental Impact Statement (EIS) Scoping

Dear Mr. Hahn,

The Alliance for Pioneer Square works for the betterment of Seattle's historic neighborhood. We work to improve business conditions and to protect and improve our built environment and pedestrian realm. We have participated in numerous planning meetings regarding the new Seattle Waterfront. Most recently more than thirty neighborhood stakeholders, a cross section of business, property owner, and residential representatives - met with your staff to discuss the current design for Alaskan Way.

The neighborhood was unanimous in its response: **an eight lane highway disconnects Pioneer Square from its historic roots to the water.** The proposed road disconnects us from a newly redesigned waterfront and poses a real threat of isolating our businesses and many of Seattle's historic assets from the thousands of visitors anticipated to visit Seattle's new waterfront. While considering the scope of the Environmental Impact of this new street, the *true* impacts on Seattle's Historic District, on its built environment, its walkability and its economy must be included. This includes buildings, areaways, public right of ways, the Boat Landing; the entirety of the Historic District.

It is hard to fathom that a transportation project of this magnitude which impacts the Port of Seattle, WSDOT's South Tunnel Portal, and the Washington State Ferry terminal at Coleman Dock and City of Seattle streets does not include *any* federal funding. Federal funding of the slightest portion of this project requires it to be considered a federal undertaking pursuant to Section 106 of the National Historic Preservation Act and/or Section 4(f) of the Department of Transportation Act, 49 U.S.C. § 1653.

This letter is intended to remind SDOT and the City that recipients of federal funding or the recipients of a federal permit are subject to the restrictions and limitations imposed by federal law. Under the National Historic Preservation Act (NHPA), 16 U.S.C. § 470(f) and commonly referenced as "Section 106 Consultation", any agency using federal funds shall "take into account the effect of the undertaking on any district, site, building, structure, or object" that is included in the National Register. The NHPA expressly authorizes the Advisory Council on Historic Preservation (ACHP) to comment on the undertaking. 16 U.S.C. § 470(f). A Section 106 consultation also requires the consultation of the state historic preservation office, the Washington Department of Archaeology and Historic Preservation, as

well as community stakeholders, as the projects proceeds. These regulations include a requirement that the recipient specifically identify, assess, and resolve adverse effects that would otherwise result from the proposed project.

As previously noted, the newly proposed Alaskan Way will change the historic orientation and setting of the Pioneer Square Historic District, both a local and National Register Historic District which includes two National Historic Landmarks. Under Section 4(f) of the Department of Transportation Act, 49 U.S.C. 1653(f), the federal Department of Transportation "shall not approve any program or project which requires the use of ... any land from an historic site of national, State, or local significance ...unless (1) there is no feasible and prudent alternative to the use of such land and (2) such program includes all possible planning to minimize harm."

While we appreciate that there are many competing needs for Alaskan Way, it is not clear to us that SDOT has in fact examined feasible alternatives or designed to minimize harm. These must be included in this next phase of planning.

Thank you for your consideration. We look forward to working with the City to ensure a waterfront for all, including Pioneer Square.

Sincerely,

A handwritten signature in cursive script, appearing to read "Leslie G. Smith".

Leslie G. Smith
Executive Director

Mike McGinn
Sally Clark
Sally Bagshaw
Tim Burgess
Richard Conlin
Jean Godden
Bruce Harrell
Nick Licata
Mike O'Brien
Tom Rasmussen
Allyson Brooks, PhD
Diane Sugimura
Bernie Matsuno
Ethan Raup
Goran Sparrman
Angela Brady
Steve Pearce
Marshall Foster
Gary Johnson
Karen Gordon
Chris Moore

September 23, 2013

Peter E. Hahn, Director, Seattle Department of Transportation
c/o Mark Mazzola, Environmental Manager
PO Box 34996
Seattle, WA 98124-4996

RE: Cascade Bicycle Club's comments regarding the Waterfront EIS Scoping Process

Dear Peter,

Cascade Bicycle Club (Cascade), on behalf of our 15,000 members, is pleased to provide comments on the EIS Scoping for the Waterfront Seattle project. The Waterfront Seattle project is an opportunity to rethink the waterfront by creating inviting, activated public spaces, improving active transportation corridors and connections and reuniting downtown Seattle and Pioneer Square with the Waterfront. Cascade believes the waterfront, with its ability to provide flat, direct connections is an extremely important transportation corridor for all modes, but the current designs do not go far enough to accommodate pedestrians and cyclists. We ask you to evaluate the following points in the upcoming EIS.

The Waterfront EIS should study an alternative that includes fewer travel lanes south of Yesler Way. The current configuration with eight vehicle lanes, including two turning lanes into Colman dock creates a street that is extremely unfriendly to both pedestrian and bike crossings. Wider streets present a barrier to those who may have trouble crossing longer distances in one light cycle and create an auto dominated feeling in what was presented to the city as a people oriented place. Cascade is concerned that this roadway capacity is only necessary at peak demand, which will occur only a few times a year and would like to see the EIS evaluate if a roadway less than 96' feet south of Yesler Way can accommodate the needs of Alaskan Way.

The Waterfront EIS scoping should evaluate whether convertible lanes can address the needs of transit, freight and ferry traffic and allow for a narrower roadway with fewer lanes. Convertible lanes encompass a wide variety of facilities in which direction, turning movements and types of vehicles (freight/transit) allowed can vary during the day to adapt to changing traffic conditions.¹ The scoping should study whether convertible lanes can provide flexibility for peak periods of traffic and allow for a narrower, more pedestrian and bike friendly street.

Evaluate the creation of a dedicated transit/freight lane that is 11' wide. Cascade understands the need for both reliable transit and freight on Alaskan Way, but believes the EIS should evaluate whether transit and freight can share a travel lane south of Columbia.

Evaluate 10' lane widths to ensure safety for all users. Wide lanes can encourage speeding traffic and create a stressful environment for those wanted to travel by bike or walking. We

request you evaluate narrower lanes on Alaskan Way to minimize speeding traffic and make it easier to cross from the promenade into downtown and Pioneer Square.

Evaluate crossings of Alaskan Way for both pedestrian and bicycle safety. Cascade is concerned that the preliminary designs do not show a crosswalk for pedestrians or intersection crossing markings to indicate the intended path of people on bikes on the south side of Yesler Way. Furthermore, the EIS should evaluate the crossings at Spring and Seneca Streets for people riding a bike, as these are identified as protected, separated bike lanes leading into downtown in the Seattle Bike Master Plan Draft that was released in June 2013. Crosswalks and bike crossings will be a key part of making it easy to bike along and across the Alaskan Way corridor and the EIS should evaluate cyclist only crossing phases at intersections along with pedestrian leading timing.

Mitigate impacts of roadway by utilizing urban design best practices. These may include, but are not limited to curb bulbs, decreased turn radii, signal timing and lightning will be necessary to ensure the corridor works for all modes of transportation.

Mitigate potential traffic impacts on Pioneer Square by evaluating allowing only right turns into/out of Pioneer Square from Alaskan Way on S. Washington, S. Main, S Jackson and S. King Streets. This will minimize delay and turning movements on Alaskan Way and make it easier and safer for pedestrian and bikes to access Pioneer Square.

Evaluate the opportunity to include only one turning lane into Colman Dock at Yesler. The current design drawings include two northbound turn lanes with a multi-block queuing area that push the road width at Yesler to over 100 feet, making it difficult area to cross. Before committing additional roadway width to turning lanes, the EIS should look at other opportunities to facilitate ingress and storage at Colman Dock. This is especially relevant as WSDOT may move to more efficient ticketing systems, such as using the Good To Go Pass, in the near future.

Evaluate the roadway configuration using a multi-modal level of service (MMLOS) to ensure the road is designed to move all users, not just those in vehicles. Instead of relying on traditional traffic models, the EIS should evaluate Alaskan Way using a level of service (LOS) that looks at bike and pedestrian traffic along with autos. Additionally, Cascade would like the EIS to include LOS assumptions that result in the current lane configuration.

Evaluate the MMLOS with a 14'-16' foot cycletrack/separated bike facility in addition to the proposed 12' separated bike facility. With the demand for a flat, direct bicycle connection on the waterfront and the addition of Bike Share. Cascade believes that a 12' wide cycletrack or separated facility may not be wide enough to accommodate the demand. We ask that the EIS look at MMLOS and the opportunities to increase bike capacity by using a wider bike facility.

Thank you for the opportunity to comment. Cascade is committed to ensuring the Waterfront project is a great public space for the City of Seattle and offers safe, direct and convenient access for those who wish to ride a bike.

Jeff Aken
Principal Planner
Cascade Bicycle Club

ⁱ NCHRP Synthesis 340: Convertible Roadways and Lanes. 2004. Accessed at:
http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_syn_340.pdf on September 23, 2013.



feet first

promoting walkable communities

314 First Avenue S
Seattle WA 98104

p 206.652.2310
f 206.381.1631

feetfirst.org

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Sustainable West Seattle

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University of Washington

Bill Weis, PhD
Seattle University

Staff

Lisa Quinn
Executive Director

Jen Cole
Safe Routes to School
Program Director

Drew DeVitis
Walking Promotions
Coordinator

Zoe Harris
Safe Routes to School
Event Coordinator

September 24, 2013

Peter Hahn, Director

Seattle Department of Transportation (SDOT)

700 Fifth Avenue

Seattle, WA 98124-4996

RE: Seattle Waterfront Environmental Impact Statement (EIS) Scoping

Dear Mr. Hahn:

Since 2001, Feet First has worked to ensure that all communities in Washington are walkable. We represent people of all ages and abilities who need safe, accessible and inviting ways to go by foot. Walking is a vital transportation mode that strengthens communities, reduces pollution, and promotes good health.

Seattle's Downtown Waterfront is the City of Seattle's "front porch" and a vital regional asset. The current Alaskan Way Viaduct severs this asset from the rest of Downtown Seattle; the Viaduct's removal combined with the future reconstruction of Alaskan Way is an unprecedented opportunity to reintegrate the neighborhoods; it is critical that this project is done correctly. Although Feet First appreciates the need to balance the needs of pedestrians against those of other travel modes using Alaskan Way, we are concerned that the current defining of the lanes unduly favors motorized vehicles over people who choose to walk. The upcoming environmental review provides an opportunity to evaluate alternatives to this design that will better serve the thousands of people who will walk along and to the completed waterfront.

We identify specific elements that the Seattle Waterfront Environmental Impact Statement (EIS) scoping should include.

Please include the assumptions that have been made of the Level of Service (LOS) for defining the lanes and how you are incorporating multi-modal LOS. How SDOT defines the lanes based on the type of users will have a dramatic effect on the design of the Seattle Waterfront.

The current plan for Alaskan Way between Yesler Way and S Jackson Street poses difficult challenges for planners and engineers tasked with accommodating the many travel modes that must use it. The crosswalks in this road section provide the main pedestrian connection between Pioneer Square and the Waterfront, Metro transit buses will use this stretch of road to travel between West Seattle and Downtown, and most vehicles accessing the Colman Dock Ferry Terminal must make a left turn at the intersection with

Yesler Way. However, we are concerned that Waterfront Seattle's current plan calls for eight lanes for much of this road section, including two long ferry queuing lanes approaching Yesler Way and two transit-only lanes. Even with the planned pedestrian refuge median, the eight-lane profile presents a harsh environment for people, creating a barrier that will discourage people walking between Pioneer Square and the Waterfront. Feet First understands that the Waterfront Seattle current designs are only at a preliminary stage of development. We expect that the city will conduct a full evaluation of alternatives that would create a safer and more pleasant environment for everyone.

As SDOT analyzes alternative lane configurations for this road section, we recommend that you consider a smaller road profile. Feet First is particularly concerned that the current eight-lane design will be driven by peak ferry-bound vehicle traffic that will only occur a few times a year such as three-day summer weekends. We request an analysis of how often during the course of the year ferry-bound vehicle traffic will be at peak demand. In addition, the environmental review should evaluate transportation system management measures reducing peak-demand ferry traffic, including a ferry reservation system, time-of-day variable pricing. The analysis should also consider flexible lane usage during peak demand periods. The EIS should also consider the issue of lane widths. We are concerned that excessive travel lane widths will encourage speeding, which threatens the safety of people walking in this area. We urge you to assess the impact of various lane widths on pedestrian safety. There are places where the volume of traffic does not justify the roadway width including south of Pike to Yesler Way where the volume is identified to have 25,000 Average Daily Traffic (ADT). Currently being defined in the documents is a roadway of 65 feet, whereas the same ADT on 1st Avenue South is accommodated with 55 feet of roadway width.

The current plan designates Columbia Street as the main transit corridor for buses traveling between Downtown and points south via Alaskan Way. This plan would include designated transit lanes for the entire length of Alaskan Way south of Columbia Street. Although Feet First strongly supports measures to improve the speed and reliability of transit service, we are concerned that these transit-only lanes also increase pedestrian crossing distance along Alaskan Way. Moving the transit access corridor further south would allow for a smaller roadway section along Alaskan Way; it would also provide better transit access to the south end of Downtown as well as the King Street Station. The EIS should consider selecting transit access corridor alignments including S Main Street, 1st Avenue via S Dearborn Street, as well as the feasibility of using the SODO Busway if the S Lander Street Overpass is built.

We are concerned that the current plans do not include a crosswalk across the south leg of the intersection of Alaskan Way at Yesler Way. This represents very poor design practice for pedestrians which should only be done under exceptional circumstances. The aforementioned traffic analysis should evaluate this intersection both with and without a crosswalk across the south leg of this intersection.

It will be crucial to provide urban design features throughout the waterfront including curb bulbs, reducing the turning radius, adding pavement markings, lighting and installing proper signal timing. Sufficient time must be allowed for pedestrians to cross the street to safety, especially older people and people with disabilities who might walk slower than the average person. This imperative need must be considered in any signal timing plans evaluated in the EIS.

Finally, Feet First is concerned about interactions between people walking, biking, and driving during crossing movements along the entire length of Alaskan Way. People who are biking and leaving or entering the cycle track will need to cross up to eight lanes of traffic and avoid conflicts with people

crossing at the intersection. The EIS should consider cycle-only phases, leading pedestrian phases, and other advanced techniques to cope with the different types of users.

Thank you for considering our thoughts on the upcoming environmental review of the Seattle Waterfront. We look forward to working with the city in the coming months towards the development of a ***Walkable Waterfront***.

Should you have any questions or concerns, please feel free to contact me by calling 206.652.2310 ext. 6 or emailing me at lisa@feetfirst.org.

Sincerely yours,



Lisa Quinn

Executive Director

cc: Mike McGinn, Seattle Mayor
Sally Clark, President Seattle City Council
Sally Bagshaw, Seattle City Councilmember
Tim Burgess, Seattle City Councilmember
Richard Conlin, Seattle City Councilmember
Jean Godden, Seattle City Councilmember
Bruce Harrell, Seattle City Councilmember
Nick Licata, Seattle City Councilmember
Mike O'Brien, Seattle City Councilmember
Tom Rasmussen, Seattle City Councilmember
Steve Pearce, Seattle Department of Transportation
Angela Brady, Seattle Department of Transportation
Hannah McIntosh, Seattle Department of Transportation
Diane Sugimura, Department of Planning and Development Director
Marshall Foster, Department of Planning and Development Planning Director
Leslie Smith, Executive Director Pioneer Square Alliance
Cary Moon, People's Waterfront Coalition
Todd Vogel, Executive Director International Sustainability Institute
Geri Poor, Regional Transportation Manager, Port of Seattle
Brad Khouri, AIA President, Principal b9architects
Rico Quirindongo, AIA, Pike Place Market Preservation & Development Authority board member
Mark Reddington, Co-Chair, Waterfront Seattle Oversight Committee
Patrick Gordon, Co-Chair, Waterfront Seattle Oversight Committee
Dave Walsh, AIA, LEED AP BD+C, Sellen Sustainability
Lisa Richmond, Executive Director AIA Seattle
Julie Brannon, ECS Support Services Manager, Lighthouse for the Blind
Doug Hilde, Washington Council of the Blind
Heidi Hughes, Executive Director, Friends of Waterfront Seattle
Jeff Aken, Senior Planner, Cascade Bicycle Club
Blake Trask, Policy Director, Bicycle Alliance of Washington
Monica Smith, Urban Policy Director, Futurewise
Rob Johnson, Executive Director, Transportation Choices Coalition
David Moseley, WSDOT Ferry Director
Tim Gould, SR99 Advisory Committee Member on Tolling and Traffic Management

September 25, 2013

ELAINE L. SPENCER
(206) 340-9638
espencer@grahamdunn.com

Peter E. Hahn, Seattle Department of Transportation
c/o Mark Mazzola, Environmental Manager
PO Box 34996
Seattle, WA 98124-4996

Re: Comments on the scope of the EIS for the proposed Waterfront Seattle Project

Dear Mr. Hahn and Mr. Mazzola:

This letter is submitted by MSI 1201, LLC, which owns the 1201 Western Building. It is listed on the National Register of Historic Places.¹ At one time in the fairly recent past, it was the headquarters for Immunex Corporation which was subsequently acquired by Amgen Corporation. The building was comprehensively renovated in 1986. Since 2005, the first floor has been occupied as the retail showroom of McKinnon Furniture, which since 1989 has manufactured high quality hand-crafted furniture in a separate facility in Seattle. The upper floors levels 2-6 and a penthouse level are office space for a variety of tenants. Because the building is listed on the National Register, major modification of the building in the future is highly unlikely. The building has a floor plate of approximately 15,000 square feet, which works well for office tenants, but due to its deep floor plate and windows on only three sides, this makes the building unlikely to be converted to residential uses in the future. The Building's historic designation means it will not be able to be demolished and rebuilt to take advantage of greater density that the zoning might allow or conversion to higher value uses such as residential condominiums. As a result, any special benefit to the 1201 Western Building from the Waterfront Seattle Project ("Project") will likely depend upon the building remaining desirable for retail or restaurant use on the lower floor and desirable for office use on the upper floors.

The Project at this point seems to be primarily focused on the big design concepts that the City is seeking to implement – with little or no regard to the damage that implementation of those big concepts may do to the individual abutting properties. If the Project is to receive the L.I.D. funding that it depends upon, it is important that the EIS process be used as an occasion to insure that in its pursuit of the larger vision, the Project does not damage the very properties that it is

¹ It is called "1203-1207 Western Avenue" (H16) in the Cultural Resources Assessment submitted by the City of Seattle for purposes of the Elliott Bay Seawall replacement project.

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intended to create special benefit for. Particularly with historic properties, for which substantial alterations can be difficult, time consuming and costly, the Project cannot simply assume that the surrounding area will change to be molded to the vision of the Project. Rather the Project must be adapted to the needs and peculiarities of the historic properties.

With that background, the EIS should focus on the following potential impacts of the Project on the 1201 Western Building's long-term viability.

Parking and access The building currently has 8 parking stalls along the western side of the building. In addition, its loading dock for garbage and deliveries is on the western side of the building as well as the emergency generator. It is critical to our tenants that access to those parking stalls be maintained, both during construction and long-term. In order for the upper stories to remain attractive to office tenants, there must be nearby parking that is available to their visitors. The City of course needs to increasingly depend upon transit, biking and walking for commuting – but most offices need to have customers and suppliers come to them, and that requires parking. It is critical to the building as a whole that access to the service functions of the building – garbage and deliveries – be maintained. The proposed plan appears to cut off access to the building's parking and service areas, and that would severely damage the value of the building.

Similarly the building has a combined loading dock and sidewalk with retail tenant entrances around the south and west sides of the building, which is part of the historic structure. It is not clear that the Project maintains access to that loading dock and sidewalk/entrances.

Traffic impacts, particularly during construction Prior to commencement of the Alaskan Way Viaduct Replacement Project, there were 20 furniture stores along Western Avenue. Today, due to the congestion created by the Viaduct Replacement, the PSE main replacement that the Viaduct Replacement has necessitated, and the seawall construction, only 8 remain.² Western Avenue between Spring and Virginia Streets is being expected to carry significantly increased volumes of traffic, and as a result is frequently gridlocked. The City must determine how it can mitigate that impact so that traffic continues to be able to move. In particular, the City must find a way to mitigate the gridlock that occurs at the intersection of

² Although the 2008 recession was difficult for furniture stores, that recession has ended in Seattle some time ago, Seattle has experienced a robust recovery, with unemployment now well below the long-term unemployment average and the average annual wage having reached record highs. <http://seattle.cbslocal.com/2013/08/12/average-seattle-wage-tops-50k-while-unemployment-rates-stay-low/> Nonetheless, furniture stores along Western Avenue continue to close. McKinnon tells us that it is the congestion and loss of parking caused by the viaduct/seawall/PSE projects that are causing them to be at risk of closing as well.

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Western Avenue and Virginia Street. If a signal is not a viable solution, then there needs to be a policeman to direct traffic, so that the necessary volume of traffic that must use Western is able to do so.

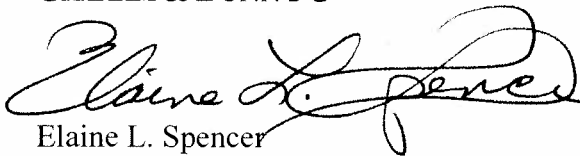
What will happen to the Seneca Street on-ramp? It is our understanding that when the viaduct is demolished, the Seneca Street on-ramp will be demolished as well. However if that is not the case, the EIS should clearly describe what will occur, and then disclose the impacts of any alternate plan. In particular, what will the impact on the flow of Seneca Street be of retaining portions of the Seneca Street on-ramp, and what will the impact be on the 1201 Western Building.

We are not here repeating the comments in the letter submitted by the Seattle Historic Waterfront Association, but want to adopt those comments as well. The issues identified in its comment letter apply with equal force to the 1201 Western Building.

Thank you for considering these comments.

Sincerely,

GRAHAM & DUNN PC



Elaine L. Spencer

September 24, 2013

ELAINE L. SPENCER
(206) 340-9638
espencer@grahamdunn.com

Via Email and Regular Mail

Peter E. Hahn, Director of Transportation
c/o Mark Mazzola, Environmental Manager
PO Box 34996
Seattle, WA 98124-4996

Re: Scope of the EIS for the proposed Waterfront Seattle project

Dear Mr. Mazzola and Mr. Hahn:

Thank you for the opportunity to comment on the scope of the EIS for the Waterfront Seattle Project ("Project"). The EIS can play an important role in one of the most important public discussions about the form of our city in many decades. The EIS, if properly done, will provide both the City government and the community as a whole with an opportunity to examine the details of the Project and their consequences. It will provide the community with the opportunity to make intelligent adjustments, which are essential if the community's very considerable investment to date, and investment yet to come, is to achieve the promise that the community has so long hoped for. On the other hand, if the EIS simply is a justification for the project as currently designed, and does not truly analyze its impacts and potential reasonable alternatives that could lower those impacts, it will neither comply with the requirements of SEPA, nor serve its vital function.

This letter is submitted on behalf of Waterfront Landings Condominium ("Waterfront Landings"). Waterfront Landings is a 232-unit residential condominium community with an aggregate value of over \$125 million, located on Alaskan Way between Pike and Lenora Streets. It is home to nearly 400 residents, who have chosen to live there because of the scenic beauty of the location, the amenity of its pedestrian environment, and its easy access to downtown Seattle. As with most people, the owners' investment in their homes is one of their largest and most important financial assets. Of the 386 people living at Waterfront Landings, 25% are senior citizens and retired, 6% are children, and 70% are adults, most working.

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I. Waterfront Landings has very serious concerns about the current design for the Elliott Street Connector and the way it is designed to intersect with Alaskan Way.

Waterfront Landings is comprised of three buildings; each with two wings. The current design of the Elliott Connector/Alaskan Way intersection will severely damage the value of the homes in the southernmost building and the south wing of the middle building, and particularly the homes on the south wing of the south building. The proposed retaining wall, with trees planted atop it, will completely eliminate the views and light from all of the south-facing units in the southernmost wing. Those views create a substantial part of the value of those units, and under the proposed design the units will go from their current status as prime real estate, to being blighted by the wall encroaching into Pine Street. They will also be subject to the dust, fumes and pollution of traffic being brought immediately adjacent to their open windows. (As we have told the City in numerous prior letters associated with the viaduct and seawall replacement, over half (53%) of the units in Waterfront Landings are not air conditioned, and thus it is essential that residents be able to open their windows.) Units that have always enjoyed the privacy of upper stories will now have motorists able to look into their windows.

The current design destroys the vehicular access to the building's parking garage from Pine Street and the access to the service area at the rear of the building, and forces what has been a landscaped pedestrian walkway in front of the three southern wings to be turned into a loop access road for garbage trucks, delivery trucks, vans and cars, which will also pass within a few feet of residents' windows. In a traffic survey, Waterfront Landings determined that on average 172 vehicles enter and exit our south garage door during each 16-hour day (the gate is closed from 10 pm to 6 am daily due to homeless camping and illegal activities behind the building at the southern end). This translates to 11 vehicles per hour or one vehicle every 6 minutes.

The elevated road bed for the intersection of Alaskan Way and the Elliot/Western extension will cut off the pedestrian routes that currently provide easy access for residents with disabilities to the Pike Place Market and from there, to the rest of downtown.

Finally, we are concerned that the Elliott Extension will create an even more ideal environment for homeless camping, drug use and other illegal activity. While the City has long experienced those anti-social behaviors under the Alaskan Way Viaduct, the Waterfront Landings building was designed to protect itself from all aspects of the viaduct and the train tunnel behind it, including the homeless encampments. The current design of the Elliott Extension will tend to move those behaviors immediately outside the windows of Waterfront Landings residents. The City has shown itself unable or unwilling to deal with illegal street behavior elsewhere in downtown Seattle and on the waterfront, but Waterfront Landings residents are entitled to expect the City to protect them from those behaviors if the City moves the behaviors to immediately outside residents' windows.

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II. The EIS should include an alternative that moves the intersection of the Elliott Extension and Alaskan Way to Pike Street rather than to Pine Street, so that it does not require the ramp adjacent to Waterfront Landings, and so that it does not damage the value of Waterfront Landings units.

An EIS must contain a discussion of reasonable alternatives to the proposed action that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. WAC 197-11-440(5). There is considerable irony to the fact that while the City expects to fund the Project in part with \$200-\$300 million in L.I.D. funding from properties that are specially benefitted by it, the current design will instead substantially depreciate the value of Waterfront Landings. A reasonable alternative must include a redesign of the Elliott Extension/Alaskan Way intersection that at least preserves the current qualities of the units at Waterfront Landings. It is not our role, nor are we qualified, to propose such a design. We would note, however, that the Washington State Department of Transportation, Federal Highway Administration and the City of Seattle had earlier proposed a design for the Elliott & Western Connector that moved the intersection to Pike Street, and which would have had none of the adverse impacts of the current design on Waterfront Landings. It is entirely possible that improvements could be made to that earlier design. But the City must consider an alternative that does not damage Waterfront Landings as the current proposal will do.

III. The EIS must evaluate the impacts of the proposed action on air quality, odor, transportation and traffic hazards that it will have on Waterfront Landings.

Assuming that the current plan remains the "preferred alternative" for EIS purposes, it is critical that the EIS evaluate the impact to air quality of the units in Waterfront Landings from placing the traffic on the Elliott Extension immediately outside the windows of the units in Waterfront Landings. It must evaluate the impact of replacing what is now a landscaped pedestrian walkway in front of Waterfront Landings along Alaskan Way with the truck/delivery/auto access road to reach the Waterfront Landings garage and service area. It must evaluate the loss of easy pedestrian and handicapped access from Waterfront Landings to the Pike Place Market, and the traffic hazards that will be created by the proposed design.

IV. The EIS must evaluate the impact on police and social services from creating an ideal environment for homeless camping, drug use and other illegal activity in the canyon the proposed design will create between the Elliott Extension retaining wall and the Waterfront Landings building.

"Public services," including police and other governmental services are elements of the environment that must be considered in an environmental impact statement. WAC 197-11-444((2)(d)). The EIS needs to disclose how the City intends to police and maintain the entire boulevard that is to be created by the Project. But it must particularly disclose how it will address the increased demand for police and social services that will come from creating a haven

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for anti-social behavior immediately adjacent to what has in the past been a high quality residential setting.

V. The EIS must evaluate the impacts of the loss of parking from the totality of the viaduct replacement/seawall replacement and Waterfront Seattle projects.

As we have said in the past, the parking which has historically been available on the waterfront has been critical to the residents of Waterfront Landings. There is no transit on the Waterfront, and any guests, particularly elderly relatives, who visit them necessarily come by automobile. The combination of the viaduct replacement, the seawall replacement, and now the proposed Waterfront Seattle Project have steadily reduced the available parking at the waterfront. That loss needs to be mitigated, and the EIS needs to discuss how it will be mitigated. The cost of that mitigation must be factored into the overall cost of the project.

Thank you for considering these comments. Waterfront Landings looks forward to working with the City as it develops the reasonable alternatives that must be discussed in the EIS, so that the ultimate project best achieves the goals that the community has long held for the transformation of the Seattle waterfront.

Sincerely,

GRAHAM & DUNN PC

A handwritten signature in black ink, appearing to read "Elaine L. Spencer", written over a horizontal line.

Elaine L. Spencer

cc: Maureen Miller

m35039-2043670.doc

Miners Landing



September 24, 2013

Peter E. Hahn
Director, Seattle Department of Transportation
Po Box 34996
Seattle, WA
98124

Re: Comments on the scope of the EIS for the proposed Waterfront Seattle Project

Enclosed is a letter I sent in July of this year expressing my apprehensions about the lack of access/parking to the Waterfront. Please accept this letter addressing my concerns.

I am requesting that our proposal be considered in the EIS as an alternative. I also request that the EIS analyze the impact of the loss of parking on the number of visitors to the waterfront. In doing so, the EIS must recognize that today, approximately 70% of the visitors to the waterfront arrive by private automobile and in family groups including children and elderly persons who cannot walk long distances or on steep terrain. The City of Seattle does not have the surrounding residential density that would naturally activate the public spaces that will be created along the Waterfront. In that sense it is very different from Manhattan, where more than a million people live within easy walking distance of the Highline Park. The EIS should also analyze the impact on public services, particularly police and security purposes, if a reduction in visitor traffic leads to attraction of criminal and anti-social behavior, as happened with Freeway Park in Seattle and has been well documented in other public spaces around the country which did not draw sufficient visitor traffic to keep them safe.

The entire Waterfront Community is very concerned that this parking/access issue is not being addressed. We have raised this issue numerous times by several different members of our community, we have even presented to the Waterfront Executive Committee informing them of our community's concerns. The current waterfront design, if implemented, will result in diminished visitors, fewer sales, and reduction in property values. Unfortunately, the current design has not changed and none of our concerns have been addressed.

The privately owned Piers and the Seattle Aquarium are all in business to serve the public. Pier 57 has been in business for over 40 years and last year we had a record of over 4 million visitors to the Seattle Waterfront. We know from our decades of experience on the waterfront that if virtually all of our parking is removed, and not replaced, then the visitor counts as well as our sales and property values will plummet. Not to mention, the public will not be able to enjoy the new waterfront.

Please review our letter as we take this matter seriously.

Regards,


Hal Griffith

Gateway to the Alaskan Gold Rush

Miners Landing



June 7, 2013

Waterfront Seattle Executive Committee

Re: Lack of Access in the Current Waterfront Seattle Concept Design and Framework Plan

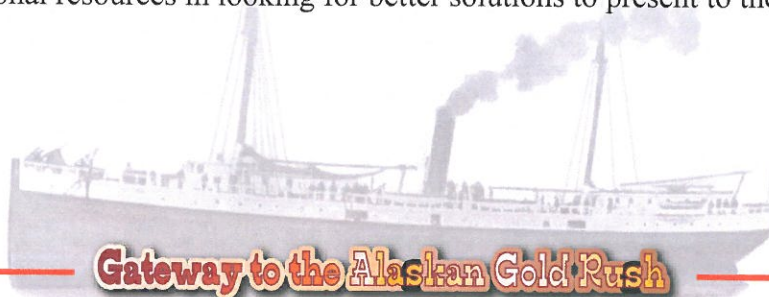
Dear Executive Committee:

We are writing to raise serious concerns about the lack of accessibility to the Central Waterfront in the current Waterfront Seattle Concept Design and Framework Plan. In addition to this letter, we would like to present our recommended design elements at the next meeting of the Executive Committee.

You know me as the owner of Pier 57 and the Seattle Great Wheel. My family and I have been devoted to developing and supporting a vibrant Seattle Waterfront for more than four decades, and now my children are deeply involved in the operation of our businesses as well. We feel we take a backseat to no one in supporting the goal of a vibrant Waterfront, admired, enjoyed and accessible by all.

The process of the last two years to develop the new Concept Design has been impressive. I have observed it closely and participated as an active member of the Seattle Historic Waterfront Association. I appreciate the immense investment of time it has taken and I respect the personal commitments of the members of the Committee to making the vision a reality.

While I am not a public person by nature, I feel compelled to speak now because I am convinced a critical course correction is needed in the planning of Seattle's new Central Waterfront and the moment to address it is slipping away. To be a responsible contributor to the conversation, I have invested personal resources in looking for better solutions to present to the city.



My core concern is very simple and I would hope everyone comes to share it: while the Waterfront Concept Design promises a dramatic expansion in the number of visitors, it radically reduces access and parking and therefore will fail to deliver its promise. In fact, the present Concept Design will not come close to accommodating the Waterfront visitors we have had in the past—and those numbers have increased dramatically in the past year with the installation of the Great Wheel. I'd like to share some of my thinking and analysis of how to address the drastic reduction in access that the current Concept Design calls for.

Consider the City's statistics that in 2010 there were approximately 1200 on-street parking spaces in the areas adjacent to the Central Waterfront.¹ At a meeting on August 23, 2011, the City presented a study indicating that, in the smaller area immediately adjacent to the Central Waterfront, there were 642 prime on-street parking spaces.² Under the Concept Design, on completion there will be 61 on-street parking spaces left—a *ninety-five percent reduction in parking capacity that even currently is incapable of supporting all our visitors, especially during the busy season.*

I want to make sure that it is clear that I am addressing the *final* plan. The challenges and difficulties during construction are not the subject of this letter. Frankly, the reduced access to on-street parking in the final plan is even more serious than the immense challenges of the intervening six years.

Parking analyses indicate that the minimum on-street parking spaces needed in the area reasonably accessible to the Central Waterfront to support *current visitor levels* is about 1,500. The Concept Design adds features that are intended to increase visitor flow to the Central Waterfront but the plan does not confront or even seem to perceive the parking issue, which will doom the Concept Design's own objectives.

Ironically, the vision of the Concept Design will be very appealing to many, but only a small minority of those who will find the vision attractive will be able to enjoy it unless the Concept Design is modified so people can get to the Waterfront, and remain at the Waterfront long enough, to enjoy these new opportunities.

As it stands, the Concept Design appears to chiefly accommodate visitors who arrive by walking, cycling, or riding some future unidentified and unfunded transit. In fact, the design appears to

¹ See "Summary of Central Waterfront Parking Studies 2006-2011" page 2, under "Seawall project—parking inventory."

² E mail from Bob Donegan to City personnel summarizing meeting and City's presentation on parking. The area referred to was from Virginia to King Street—i.e., this is the most valuable, closest parking; the 1,200 spaces referred to above were in the larger area extending from Broad to just south of King Street.

assume that Seattle has the living density and public transportation infrastructure of a city such as New York, where large numbers of people can get around without a car. But in the real Seattle and King County, most residents and many of our visitors still need their cars.

This is not conjecture. It is not disputed that over seventy percent of Waterfront visitors arrive by car. Each day, we witness the crowds of toddlers, parents, and elderly visit the Waterfront. Although there is no “typical” visitor, a significant portion of visitors are multigenerational families – grandparents, parents, and children – coming together to experience the recreation opportunities on the piers, the Aquarium, the amazing views of Elliot Bay and downtown, and to visit the Waterfront restaurants. Our research shows that visitors in cars feel they must park within sight of their destination. And we know that multi-generational families are unable to walk long distances.

Moreover, we are aging. The single largest population group in the United States is still the baby-boomer generation, born between 1946 and 1964, currently ages 67 to 49. In 2019 when the Concept Design is scheduled to be the Waterfront’s reality, this segment of our population will already be ages 54 - 73. A design that calls for virtually all visitors in 2019 and after to walk or cycle many blocks to the Waterfront appears detached from these realities.

It may be that the Waterfront Committee and the design team felt that fully addressing parking issues was outside their purview. The plan claims that parking and access for a doubling of current visitors has been addressed and suggests that an unalterable balance has been struck for the use of the space. I am not aware of any analysis showing how a 95% reduction in nearby short-term parking can exist side-by-side with an increase from four to seven million visitors a year. The disconnect between attracting more visitors while eradicating virtually all Waterfront parking access is mystifying.

The City has already done the basic parking analysis. The numbers are clear. Instead of 1200 reasonably proximate on-street parking places, there will be 61. There is no plan to replace the other 1139. Our business grew 35% in the past year—and parking was in near crisis mode before that increase occurred. The current Concept Design, for whatever reason, is inevitably going to strangle not only the Waterfront businesses but also the Concept Design objectives—people cannot enjoy improvements they cannot reach. So far, the City’s answers to the devastating loss of on-street parking have been woefully unrealistic.

The City refers to an “e-Park” system that uses electronic signs to alert visitors to parking in *downtown garages*. The City suggests that this system will make as many as 4,500 spaces available, including 1,400 in the Seattle Convention Center. The City’s e-Park program also includes the Pike Place Market parking, which is already overloaded. *Downtown* parking requires Waterfront visitors to hike ten blocks west to reach the Waterfront and then turn around and hike the same ten blocks uphill. The Concept Design makes no provision for moving these

downtown parkers to and from the Central Waterfront by any other means. This is obviously not going to work and no evidence has been provided that suggests otherwise.

The Concept Design proposes escalators between approximately First Avenue and the waterfront. While escalators could be a positive feature if they are built, they will not make a meaningful contribution to visitors coming to the Waterfront by car. The parking at the upper terminus of the escalator is already at capacity. The escalator does not materially shorten the hike to the downtown garages on which the City is counting.

In short, the parking under the viaduct—which the Concept Design removes—has been critical to the survival of Waterfront businesses, especially restaurants. If this loss is not made up with close-in, on-street parking, people will simply go elsewhere and long-standing Waterfront businesses will fail, along with the new Waterfront plan.

As I watched this situation develop and came to realize the Waterfront plan was going to ignore the entreaties of those who best understand Waterfront visitors, I felt we needed to invest our own time, money and creativity in coming up with a mitigation plan. Over the course of many months we have worked with our fellow Waterfront business owners to develop a straightforward means of securing critical access without detracting at all from the other central features of the Concept Design.

These means, which are essential to the Waterfront's continuing vitality, are:

1. Angled parking along Alaskan Way, which will partially mitigate the loss of parking by restoring 365 on-street spaces versus 61 *remaining* on-street parking spaces in the Concept Design. Bear in mind that the 365 spaces is what would remain of the current 642 prime spaces and the 1200 adjacent on-street spaces. These 365 on-street, angled parking spaces will generate millions of dollars in parking revenue for the City at very little cost. This is not a new concept; it has been specifically raised with the City (see Donegan e mail of August 23, 2011) but ignored.
2. Dedicated parking structure located between Spring and Seneca, providing at least 350 spaces. Note that the combination of 365 on-street spaces and 350 garage spaces is still woefully short of the 1200 spaces that now exist, and that garage spaces are inferior to on-street spaces. Both the angled parking and the garage spaces will generate additional revenue for the City. This added revenue should be placed in a dedicated fund for the maintenance of the Central Waterfront public spaces so that they do not suffer the fate of the existing City-owned Waterfront facilities (e.g., Piers 62-63 and the current Waterfront park).
3. A Union Street Gondola, providing access between Waterfront Park, the market, and Freeway Park, creating direct access between the Waterfront and the convention center,

the transit tunnel, arts institutions, hotels, and the retail center of downtown, and making more realistic the city's inclusion of downtown parking in its calculation of parking spaces that support the Waterfront.

These Waterfront access improvements do not exclusively benefit the Waterfront; they will benefit the City, its residents, and visitors in many ways. The 350-car garage proposed for the block between Spring and Seneca also supports access to downtown and, along with the angled parking proposed, will generate substantial revenue, more than replacing the revenue the City will lose if virtually all on-street parking is erased as currently planned. The gondola is a two-way facility—moving up to 2,000 people an hour over downtown hills and traffic.

These facilities are synergistic. The easier it is to gain access to the Central Waterfront, the more people will go there, and the easier it is for these visitors to move uphill, the greater the benefit to the downtown area from the increase in Waterfront visitors.

Even with our proposed diagonal parking and the Spring/Seneca garage proposal, the number of parking spaces in reasonable proximity to the Waterfront will be dramatically reduced below historical levels. The gondola is not a substitute for parking immediately adjacent to the Waterfront, but it will mitigate the loss of on-street parking and it will enable visitors who are not up to a 20-block round-trip hill climb to use downtown garages to access the Waterfront. The gondola concept can also mitigate the shorter-term loss of parking and access during construction. If the destruction of the viaduct began at Union Street, a gondola could be up and running in a matter of weeks, because the system could be largely constructed before the viaduct is torn down, leaving only stringing of cables and hanging of gondolas to occur once the Union Street segment of the viaduct is removed.

Our proposals do not solve the access problems created by the current Concept Design but they mitigate them. Even with these measures, the Central Waterfront parking capacity will be far below already inadequate historical levels. Efforts to expand adjacent parking must continue beyond what we are suggesting here.

Some specifics:

- Construction of the Spring/Seneca garage should be included in the expedited projects category so that it is fully operational by 2016. Doing so will encourage Waterfront visitors throughout the construction period and will generate millions of dollars for the City to use in a dedicated fund for maintenance of the Waterfront public spaces. In addition, the garage should include a shuttle for transporting disabled visitors from the parking garage to the Central Waterfront. This garage will have no adverse impact on the goals of the Concept Design, but will help make those goals achievable.

- The east-west connection of the gondola will enable the City to facilitate citizen and visitor movement between the City's "front porch" Waterfront and its retail, civic, business and governmental hubs in downtown, including the Seattle Transit Tunnel, Benaroya Hall, and the Seattle Art Museum. A green energy gondola will do much more than simply overcome the City's geographic challenges to east – west connections. It will display those geographic features as City assets, creating a unique, effective, and beautiful mode of public transportation that itself would attract visitors and citizens to the City's center. We are proposing to build and operate the gondola with private investment for the public benefit.
- Angled parking can be accommodated along the redesigned Alaskan Way with very little effect on the overall design. The changes might even enhance the visitor experience. Consider that the current Central Waterfront accommodates over 4 million annual visitors along a 12-foot-wide sidewalk that creates a cozy, festive, fun and friendly atmosphere. The vast promenade/greenway/walkway envisioned in the Concept Design will not create an equivalent vibrant space. In fact, in the winter the area will feel empty—even if the Concept Design provided enough access to maximize visitors. A moderate reallocation of the space as we propose will combine the best of both worlds.
- We have developed a specific plan to support our proposals. Our plan provides for angled parking while also recognizing the importance of Alaskan Way as a corridor for cars and commercial vehicles (widening Alaskan Way by 21 feet). The modified design fully supports the continued use of Alaskan Way as a 30 MPH freight corridor (as specified by the current plan), preserves ample space planned for grass and landscaping, and will not adversely affect the planned cycling / walking path system. The suggested parking design includes spaces for disabled visitors and will allow families to park at the Central Waterfront and then engage in the recreation (e.g. biking, swimming, concert going) contemplated by the Concept Design. By allocating 6 feet of the total of 24 feet of sidewalk and 15 feet of the 82-foot-wide greenway / promenade to the additional parking capacity, the modified design creates meaningful access for those who wish to use the Waterfront while preserving an appropriately proportioned marine promenade and greenway.

We believe the drastic curtailment of parking combined with making a huge investment designed to increase Waterfront visitors is clearly not workable. Our proposals are intended to mitigate, but will not solve, this problem.

We request immediate, careful study of our proposal to verify that it in fact preserves the essence of the new features of the Concept Design while avoiding the parking disaster that is now inherent in it. Beyond that, we believe a coordinated effort must be made to expand Waterfront

parking beyond historical levels in light of the *current* 35% increase in visitorship and in light of the Concept Design's goals of further increasing Waterfront appeal.

We would be happy to work with the Executive Committee to further explore how to better meet our shared intentions for the most vibrant, accessible possible Seattle Waterfront.

We appreciate your serious consideration of our input and look forward to meeting with you to present our plan.

Very truly yours,



Hal Griffith

cc: Waterfront Seattle Executive Committee

Charley Royer, co-chair
Margaret Walker, co-chair
Carol Binder
Bob Davidson
Dave Freiboth
Patrick Gordon
Gerry Johnson
Ed Medeiros
John Nesholm
Mark Reddington

Design Oversight Committee

Patrick Gordon, co-chair
Mark Reddington, co-chair
Bob Donegan
Cary Moon
Vlad Oustimovitch
Brian Steinburg
Martha Wyckoff

Seattle City Council

Sally J. Clark
Sally Bagshaw
Tim Burgess
Richard Conlin
Jean Godden
Bruce A. Harrell
Nick Licata
Mike O'Brien

Tom Rasmussen

Mayor Mike McGinn
Arthur W. Harrigan, Jr.



King County

Department of Transportation

Harold S. Taniguchi, *Director*
KSC-TR-0815
201 South Jackson Street
Seattle, WA 98104-3856
206.477.3800 TTY Relay: 711
www.kingcounty.gov/kcdot

September 25, 2013

Peter E. Hahn, Director
Seattle Department of Transportation
C/O Mark Mazzola, Environmental Manager
P/O. Box 34996
Seattle, WA 98124-4996

Scoping for Waterfront Seattle-Alaskan Way/Promenade/Overlook Walk Environmental Impact Statement

Dear Mr. Hahn: *Peter*

King County Department of Transportation is pleased to submit the following scoping comments on the Waterfront Seattle-Alaskan Way/Promenade/Overlook Walk project Environmental Impact Statement (EIS). Redevelopment of Seattle's central waterfront represents the culmination of a host of regionally-significant projects in which King County is a critical stakeholder and active partner. King County applauds Seattle's multi-year effort to create a waterfront that lives up to its world-class potential through an exceptionally inclusive and creative planning process. This EIS is our collective opportunity to thoroughly and objectively evaluate the results of that process to ensure that Seattle achieves the project's vision with the fewest possible impacts to our environment. We hope the following comments help make this EIS as useful a decision making tool as possible.

PURPOSE AND NEED

The project's *Purpose and Need* should be closely based on the project's Guiding Principles, especially principal No. 5: ***Improve access and mobility. The waterfront remains a crossroads. The future waterfront should accommodate safe, comfortable and efficient travel by pedestrians, bicyclists, vehicles and freight.***

The Purpose and Need should recognize that the study area comprises a critical north-south multi-modal travel corridor that also must support numerous east-west crossings, especially for pedestrians. In addition to accommodating safe, comfortable and efficient travel by pedestrians, bicyclists and freight, the Purpose and Need should clarify the need for optimizing connections to land and water-based public transportation through and across the central waterfront corridor.

ALTERNATIVES

We offer the following suggestions for inclusion in alternatives addressed in the EIS:

Transit Facilities

Per the City of Seattle's Central Waterfront designs dated July 2013, the street design of Alaskan Way includes one transit lane in each direction between South Dearborn Street and Columbia Street and continuing along Columbia Street between Alaskan Way and 3rd Avenue. King County Department of Transportation strongly supports inclusion of all-day, two-way transit lanes and other transit priority system improvements through this portion of the project area. These improvements, or equivalent ones, are critical to ensuring fast and reliable transit service for the more than 22,000 daily bus passengers traveling between West Seattle or southwest King County and downtown Seattle on RapidRide and other bus routes. Consistent with the access and mobility principles of the project, these improvements will facilitate improved access to and from the waterfront by public transportation and ensure fast and reliable service for those travelling to, from and through downtown Seattle from northwest Seattle, southwest Seattle and south King County. These improvements are also consistent with Metro's 10-year Strategic Plan.

In addition to transit priority facilities, Metro and the City have discussed the inclusion of four transit stops within the project area. These bus stop locations include:

- On Alaskan Way: northbound stops between South Jackson and Main Streets and between Yesler Way and Columbia Street; southbound between South King and Jackson Street.
- On Columbia Street: westbound between Western Avenue and Alaskan Way.

These locations should be included in alternatives addressed by the EIS analysis. These bus stop locations improve access to transit to and from the waterfront and surrounding neighborhoods.

Of special concern is the need for consistent and reliable pathways for transit connecting SR 99 with Seattle's Third Avenue transit spine during construction of the central waterfront project. The use of potential alternative pathways should be consistent and not change periodically throughout the construction project. It should be a goal to minimize increased travel times for bus riders during the construction period.

Access to King County Water Taxi

The King County Marine Division operates passenger ferry service adjacent to Colman Dock at Pier 50 and a maintenance barge north of Pier 48. Safe, efficient and practical pedestrian and bicycle access to these facilities must be included in the action alternatives. A pedestrian crossing for passenger ferry riders must be provided at Yesler to minimize dangerous illegal crossing of Alaskan Way.

CONSTRUCTION IMPACTS

The following comments consist of suggestions for analysis of short-term construction related impacts and concerns regarding specific impacts during this period:

Construction-related Impacts to Transit Service and Facilities

As previously noted under *Alternatives*, to minimize travel time for bus riders, consistent and reliable transit pathways are needed to connect SR 99 with Seattle's Third Avenue transit spine for the duration of this project's construction period. The EIS must address this by evaluating how construction-disrupted traffic will impact transit operations within affected transit pathways through construction zones and should:

- Determine and quantify the impacts of construction-related impacts on transit travel times, speed and reliability.
- Assess the potential construction impacts to transit facilities including bus stops, trolley wires, trolley substations, and layovers or pullouts.
- Evaluate project-related traffic impacts to facilities parallel to the central waterfront in the Central Business District (CBD) such as 1st, 2nd, 3rd, 4th and 5th Avenues and South Jackson Street as well as service and facilities east-west along the Pike-Pine Streets and Madison-Marion Streets.
- Clarify the timeline and phasing of construction in relation to transit operations on Alaskan Way and Columbia Street.
- Consider potential pathways for transit during construction of Alaskan Way and Columbia Street between Alaskan Way and 1st Avenue.

Access to Colman Dock

Ferry passengers can also connect to transit routes serving First Hill/Capitol Hill via the Marion Street pedestrian causeway. These connections with transit service should also be preserved during and after construction. Additional way finding signage should be included among strategies to assist intermodal access during construction.

Access to King County Water Taxi

Access to the King County Water Taxi terminal at Pier 50 for the multiple passenger ferry routes during and after construction must be addressed by the EIS. Of particular concern is pedestrian access by Water Taxi commuters. Pedestrian and bicycle safety is the critical concern as passengers typically walk or ride the shortest route possible to catch departing passenger ferries regardless of designated pathways, signage and enforcement. As the shortest route is on the south side of Yesler Way, this travel pattern needs to be addressed in the analysis and accommodated in the design accordingly.

Construction-related Pedestrian and Bicycle Accessibility

The EIS needs to evaluate construction impacts on accessibility to Metro bus stops and facilities and connectivity between the waterfront, ferry terminal, and CBD by pedestrians and bicyclists. Increased traffic levels due to construction reroutes as well as sidewalk and street closures should

also be considered since they can impact pedestrian and bicycle movement downtown and may require temporary relocation of Metro's stops and shelters to maintain transit access. The project should consider proper wayfinding signage to identify bus, rail, ferry, and bicycle connections both during and after construction to facilitate a strong link between these modes. If significant adverse impacts are identified, the EIS will need to specify mitigation measures such as alternate pathways or solutions to maintain transit access during construction.

Elliott Bay Trail

An analysis of short-term (construction) impacts to the Elliott Bay Trail running between Smith Cove Park in Magnolia and Royal Brougham Way is needed. The EIS needs to identify the location, extent and duration of any temporary closures or detours as well as impacts to connections with other regional trails within the study area. A survey of daily trail use would be appropriate to establish its use by various travel modes. Identification of possible detour routes during construction would also be appropriate.

Preservation of access for those with limited mobility during construction

Routes 16 and 66X provide accessible service between 3rd Avenue and Alaskan Way. Efforts should be made to continue to provide people with disabilities access to the waterfront. It is currently possible to ascend and descend the hill between 1st Avenue and the Colman Dock by using the Marion Street pedestrian overpass and then the elevator in the Post building (the pedestrian bridge is not accessible closer to the viaduct, where it has an incline steeper than allowed by ADA regulations). In order to preserve this path, it is necessary to maintain an accessible pathway at ground level from the Post building to Colman Dock.

Construction-related impacts to Access Transportation, Metro's ADA paratransit service

Throughout construction, Access will continue to serve destinations on the waterfront. It is key that zones be preserved for Access vehicles at key destinations such as Colman Dock and the Seattle Aquarium. Access currently only uses Metro bus zones along the waterfront. Many of these zones will be closing and Access will need to continue to have places to drop off and pick up customers. Three minute parking zones have proven unreliable because they are difficult to enforce and when occupied for long times result in unreliable or unsafe operations. If a streetcar system with stops in the center of the roadway is selected to provide the transit link along the waterfront, then Access will continue to need dedicated curbside zones once construction is complete.

LONG-TERM IMPACTS

Addressing the following issues in the EIS should inform the project's design and implementation.

Impacts to Transit Service and Facilities

The EIS should analyze the impacts on transit operations of potential street parking and loading zones along Alaskan Way. Specifically, the analysis should address potential impacts from parking/loading zones proposed for Alaskan Way adjacent to a transit lane between South Main and Washington streets and between South Washington Street and Yesler Way. Measures to

prevent or minimize significant impacts on transit operations should also be addressed in the mitigation section.

Local Transit Service along the Waterfront

The City's EIS scoping notice for this project states that "the proposal would accommodate new local transit service along the waterfront" but does not identify the mode of transit service being considered nor how such service would be provided. The EIS should identify where on Alaskan Way transit of any mode is likely to be accommodated.

Access to King County Water Taxi

As with temporary impacts during construction, the EIS needs to analyze the impacts on passenger access and safety for both pedestrians and bicyclists to and from the King County Water Taxi terminal at Pier 50 for each action alternative evaluated. The final design should include the safest and most direct route(s) possible.

INDIRECT AND CUMULATIVE IMPACTS

The analysis of indirect and cumulative impacts should address the following projects scheduled for construction concurrently with implementation of the Central Waterfront project: Elliott Bay Seawall; Colman Dock; South End Transit Pathways; Alaskan Way Viaduct demolition; and SR 99 tolling. The city center connector under study (streetcar) between the South Lake Union Seattle Streetcar line on Westlake Avenue and First Hill line (under construction) on South Jackson Street via 1st should also be included in this section of the EIS.

MITIGATION

The mitigation section of the document needs to address how construction-related transit impacts will be mitigated including consideration of special events in SODO and/or at Seattle Center.

The mitigation section also needs to address construction-period funding for additional transit service needed to mitigate traffic disruptions during the construction time frame. WSDOT allocated approximately \$30 million for temporary additional transit service for the Moving Forward projects; however, this funding will run out in June of 2014, long before the construction-related transportation impacts are expected to end. The Central Waterfront Project will likely cause construction-related impacts to transit as Alaskan Way and other surface streets are rebuilt following demolition of the Viaduct. Funding for transit will subsequently be needed for this construction period.

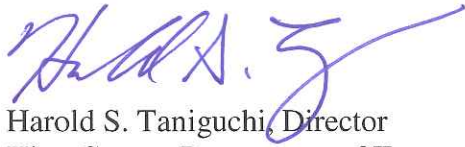
Conclusion

We hope our comments will be helpful in preparing the environmental analysis. We are open and committed to working with the City of Seattle in pursuit of creative solutions to the challenges posed by this important project. Please contact Andrew Glass-Hastings, Government Relations Officer, King County Department of Transportation, at Andrew.glass-hastings@kingcounty.gov

Peter E. Hahn
September 25, 2013
Page 6

or by phone, at 206-477-2813 to coordinate project planning as well as for additional information or clarification on any of these issues.

Sincerely,



Harold S. Taniguchi, Director
King County Department of Transportation

cc: Laurie Brown, Deputy Director, King County Department of Transportation (KCDOT)
Kevin Desmond, General Manager, Metro Transit Division, KCDOT
Andrew Glass-Hastings, Government Relations Officer, Office of Regional
Transportation Planning, KCDOT
Chris Arkills, Transportation Policy Advisor, King County Executive Office
Marshall Foster, Director, Seattle Department of Planning and Development
Richard Krochalis, Regional Administrator, Federal Transit Administration



September 25, 2013

Via e-mail: UplandEISscoping@waterfrontseattle.org

Peter E. Hahn, Director
Seattle Department of Transportation
C/o Mark Mazzola, Environmental Manager
PO Box 34996
Seattle, WA 98124

**Re: Port of Seattle Scoping Comments for the Waterfront Seattle
Alaskan Way/Promenade/Overlook Walk**

Dear Mr. Hahn:

Thank you for the opportunity to provide scoping comments on the Waterfront Seattle Alaskan Way, a vital component of the Alaskan Way Viaduct Replacement Program (AWVRP). We have been excited to participate in the city's visioning for the central waterfront. This project will create a regional asset for recreation and enjoyment of our waterfront heritage, as well as update our critical infrastructure. The Port of Seattle (Port) has actively participated in the public process to evaluate viaduct replacement options over the past decade. On August 6, 2013, our Commission approved a funding agreement to contribute \$300 million to the program. The agreement includes the Port's goals and vision for the program, including the central waterfront lane configuration. We look forward to continuing work with the project team to address issues that are as yet unresolved.

This letter summarizes our input to focus the environmental analysis and shape future design work. Our scoping comments and questions regarding the project and its impacts follow this outline:

- I. Transportation
- II. Construction Impacts, Coordination, and Detour Routes
- III. Land Use
- IV. Economic Impact

The following comments are based your presentation to the Port Commission on September 10 of this year, staff efforts to date, and other public information. As you document the environmental impacts of Waterfront Seattle/ Alaskan Way, please provide analyses for the following specific questions:

I. Transportation

We understand that the environmental review will evaluate additional program elements in the transportation report and cumulative impacts, including: Alaskan Way Surface Street changes in the vicinity of the South Portal and along the central waterfront, the connection from Battery to Pine Streets (we reference here as the "Elliott/Western Connector"), a new waterfront promenade with new bicycle facilities, waterfront transit, and other transit service. Equally important for this review is a thorough analysis of the construction impacts on the operation and functionality of the transportation network and our facilities. The EIS's transportation element should address the following issues—for the corridor overall, and for individual segments, from north to south:

System Design

General corridor

- Our funding agreement for the AWVRP articulates the critical priority for two general purpose lanes along the entire corridor, with turn lanes where warranted. This is necessary to keep traffic flowing. There is also a need to accommodate transit service that will be displaced from the Viaduct and sufficient queuing space for Colman Dock to prevent ferry queues from affecting corridor through-put capacity. How will vehicular traffic operate along various segments of Surface Alaskan Way—south of the ferry terminal, along the central waterfront, and north of Pike (in relation to LOS, travel time, freight design criteria)?
- Analysis of future traffic conditions should account for diversion associated with SR 99 tunnel tolls.
- How will vehicular traffic in the future corridor be managed? Will the project install an adaptive traffic signal system? If the function of lanes will change by time of day or day or week, how will those changes be indicated?
- Existing studies seem to substantiate that the most cost-effective solution for Waterfront Transit north of Colman Dock would be a rubber-tired bus approach rather than fixed rail in the center lanes, which would disrupt the inside through lanes of traffic (including freight) for median passenger stops. The transit analysis for the EIS should take note of other ongoing transit planning efforts such as the proposed 1st Ave Streetcar and the high capacity transit study for Ballard. It should confirm which transit mode will be adopted for Alaskan Way. It will be important to understand the role that the new waterfront transportation infrastructure will have in the overall transportation system: What other projects are critical to overall transportation system operations (such as I- 5 Improvements, adequate transit service, etc)? How are they integrated into the analysis? This includes the following questions:
 - Does the system provide sufficient capacity for volumes forecast in the 2040 horizon year?
 - How does the system encourage or rely on transit ridership? What happens if projected transit service can't be provided due to budget constraints, or if the projected levels of transit ridership do not materialize and more people drive instead?
 - What will be the decision process if a constrained budget forces reductions in the planned transportation system?
 - What project elements are most critical to retain in order to optimize traffic operations?
- How does the analysis address the need for system resiliency (in particular through the downtown core) during peak hours, events and the busiest seasons? How does it address system redundancy for emergency operations? What is the magnitude of parking lost and what impacts are associated with that loss upon waterfront tourist and retail businesses? What is the impact of too little parking, especially cars recirculating to hunt for a parking space?

Freight mobility

- How does the system meet the needs of freight to, from and/or between the two Manufacturing /Industrial Centers (M/ICs?) The maritime and industrial sector housed in those two M/ICs accounts for more than 120,000 jobs and an estimated \$28.5 billion in annual revenue City-wide.
- How can we minimize truck interaction with bicycles and pedestrians on major freight routes?
- How is the design responsive to freight needs: grade of roads, turning radii design, streetscape treatments like bulb outs, or the location of trees and other amenities?
- What are the proposed lane widths along this corridor (both with regard to through- and parking lanes)? All through lanes should have full width at 12 feet to ensure that two large vehicles (trucks or busses) can pass each other safely. Parking lane width, especially on the east, or northbound side, should accommodate larger delivery vehicles to prevent negative impacts on the outside traffic lane.

- Where is the primary over-legal route? What special design features will be included to assure that overweight and over-dimensional loads can be accommodated on that route?

Traffic modeling

- The AM peak conditions are important (in addition to the PM peak) to freight operations, as commuter and freight share peaks at the AM time period.
- Rail movements create blockages that are not standard in traffic modeling. However, they are integral to understanding port operations and the differential impacts of these scenarios. How is the system affected by anticipated road/rail crossing conflicts? Of particular concern are Broad, Wall, Vine and Clay along Alaskan Way.
- Does the modeling correctly account for Port cruise passenger and truck traffic?

North of Pike: Elliott/Western Connector

- How does the proposed design and signalization at the new Elliott/Western intersection perform (in relation to LOS, travel times, freight design criteria)?
- Lenora St Pedestrian Bridge: The design of the Elliott/Western Connector features a new (at-grade), signalized pedestrian crosswalk, in place of the current underpass of SR99. This will force trucks to stop for the signal on rather steep (6+%) hill. This compromises the functionality of the City's only N/S truck major truck street between the two M/ICs and through downtown. Further, the current design concepts to reconnect the Lenora pedestrian bridge to the surface further east than the current bridge will cause serious maintenance and inspection difficulties for the port. Can the current concept be revisited, in order to minimize conflicts with pedestrians at Lenora Street by keeping the Lenora pedestrian overpass grade-separated?
- How well does Alaskan Way and the Elliott/Western Connector meet the connectivity needs for Northwest Seattle and the estimated 35,000 vehicles per day that now use Elliott/Western/Battery Street ramps?
- How will truck movements along this stretch of the corridor be accommodated, especially larger trucks (WB-67)?
- The current design concept calls for bike lane (NB) and sharrow (SB). The steepness (almost 7% grade) and traffic volumes (18,000 vehicles) are concerning, especially since this will be the only major truck street between the two MICs and through downtown. Are there alternate design concepts that can comply with the city's code, which appears to prohibit sharrows on principal arterials?
- What is the rationale for providing a sidewalk on the West, south-bound side of the connector? There are no trip generators. Maybe that width could be used more productively elsewhere.
- How will high-volume pedestrian crossings be managed? And how would they affect through vehicle flow? Of particular concern is the crossing of Elliott/Western Connector at Lenora Street.
- How does the new "X" crossing intersection at Blanchard for Elliott and Western accommodate volumes, particularly freight volumes headed southbound?

North of Pike: Pine Street intersection and Surface Alaskan Way

The functionality of this new intersection at Pine Street is critical to the Port, as it will connect several waterfront Port facilities to our other facilities (in particular Terminal 91 (T-91)) and the I-5/I-90/SR-99 interchange in the south end:

- Pier 66 serves as home-port for cruise ships that rely on landside access from Alaskan Way.
- In addition, P-66 is home to the Bell Harbor International Conference Center, a restaurant, a public marina, market and sandwich shop, and several public access viewpoints. Our World Trade Center (WTC) is located on the east side of Alaskan Way surface, along with the Bell St. Pier parking garage.

- Pier 69 serves as the Port's headquarters, and it is also home to Clipper Navigation operating a passenger vessel terminal, and Arctic Storm offices.

With regard to cruise operations: Cruise traffic includes provisioning trucks, charter buses and other commercial vehicles as well as private vehicles. A street use permit for two of the four through lanes on Alaskan Way in front of P-66 is required to ensure the terminal functions on days when cruise ships are in port. Cruise ship port calls can generate between 1,200 and 1,600 passenger vehicle trips, including about 100 bus trips, plus 20-30 truck trips, depending on the size of the ship. Each homeport brings \$2.1 million to the local economy in spending. Difficulties in serving that terminal cost-effectively, as well as passenger complaints about access, have an impact on the ability of the terminal to be competitive. We are also concerned about congestion affecting cruise provisioning and passenger access at P-66 due to detoured traffic during viaduct demolition/connector construction. These are critical priorities.

- Is there sufficient capacity for the pulse of traffic leaving P-66 on a home port day (especially southbound taxis/buses mixed with provisioning trucks departing the pier)? This is in particular critical for the eastbound Pine Street to southbound Alaskan Way movement at the intersection.
- Please confirm that the concept design for the Pine Street intersection accommodates WB-67 trucks, particularly for turns from southbound Elliott-Western Connector to westbound Pine Street, which is the route used by the cruise terminal provisioning trucks.
- What is the rationale for providing sidewalks on both sides of the new connection from the northern end of Alaskan Way to the connector north of the overlook stairs and public plaza? What are the projections for use of these facilities? We would like to better understand the allocation of space among modes on this leg of the intersection.
- Along central Alaskan Way, the cycle track is on the west side. North of the aquarium, the current design requires northbound cyclists to cross Alaskan Way to tie into the existing eastside path at Virginia. Cyclists who do not cross will run into conflicts with passenger load and unload activities at the cruise ship and Clipper terminals. This is an existing problem that we fear will be compounded due to the likely increase in overall ridership, and in particular in the number of casual riders. What are the options to minimize this conflict?

Yesler to Pine

- How would the proposed transit lane treatments affect freight movements, both with regard to the streetcar and rubber-tire design? How would bus pullouts improve traffic flow if a rubber-tired solutions were chosen?
- What design features are planned to ensure that through traffic can flow efficiently through the proposed new central transit hub at Colman Dock, near Columbia? How would access and egress from that hub affect through-traffic flow?
- This section of the corridor will experience high volumes of pedestrian crossings. How will the signals along the proposed waterfront route be coordinated to ensure smooth flow and reduce the number of stops for large trucks along this route? What would the travel times through the corridor be without and with adaptive traffic signals?
- What are the impacts of patrons attempting to park along this stretch of the waterfront? Please include an analysis of the number of trucks that will serve buildings on the east-, north-bound side of the new street. How many trucks will exceed the width of the 8 foot parking lane, and what impact will that have on traffic flow?
- While we appreciate the design of the exclusive new cycle track on the west side, we are concerned about the potential impacts of more confident riders who will ride in the street. What are the projected numbers of cyclists, and what impact will those that ride in the street have on through traffic flow?
- Related to this question: How will horse-drawn carriages and bicycle rickshaws be handled, and what impact will they have on traffic? Will these types of slow-moving vehicles be prohibited from

using Alaskan Way and/or Elliott/Western Connector, and if not, what could their effect be on traffic flow?

King to Yesler

- North end of T-46 (King St/Labor driveway): the intersection of King St and Alaskan is the interface between the State's (South Access) and the City's (Central Waterfront) projects. It includes T-46 employee driveway, the bike path/cycle track and pedestrian access to the new Pedestrian Mall on Railroad Avenue. Port, City and State need to make sure this intersection provides reliable and safe connections for all. What is the proposed design, and how will it ensure that the intersection will function safely and efficiently for all modes?
- Lane capacity south of ferry terminal: This is a critical priority for the Port. The Port, SDOT, Metro and WSDOT have agreed that two general purpose lanes along the entire corridor, and two lanes for ferry queuing between Main and Yesler, are required to ensure the necessary capacity that so no bottle necks are created blocking through trips. We support Metro's request for dedicated transit lanes between Dearborn and Columbia to ensure that transit displaced from the Viaduct can continue to serve its riders.
- How well does the preferred alternative meet the connectivity needs for SoDo, the Duwamish and Ballard Interbay?
- What is the project's impact on the traffic operations at the new SR-99 South End (S. Holgate to S. King Streets) interchange, particularly at the S. Atlantic Street / East Marginal Way and S. Atlantic Street / 1st Avenue S and Alaskan Way/Dearborn intersections?

II. Construction Impacts, Coordination and Detour Routes

Port of Seattle operations

Operations at Port facilities, including T-46, P-66/Bell Street Pier and parking structure, and P-69 could be significantly affected by construction unless provisions are made to minimize that impact. Additionally, we must resolve and mitigate cumulative construction impacts from related projects.

We will continue to work with the project team to develop a design and construction management approach that meets the freight needs for both the region and the Port's operational requirements, including critical needs at our P-66 complex and P-69 relating to cruise passengers access, cruise vessel provisioning, Bell Harbor and Clipper maritime passenger vessel provisioning and passenger access, international conference center operations, parking and adjacent office uses.

- Construction analysis should consider additional traffic that could be diverted to surface Alaskan Way by SR 99 tunnel tolls.
- The Port would oppose any long-term detours that use the northern section of Alaskan Way (near P-66) during the cruise season (currently May to October) unless major improvements are made to that street. The cruise terminal requires use of one through lane in each direction on cruise days. If through capacity is needed for detours, widening may be required. Could the former trolley track area provide a workable mitigation area?
- As with the Bored Tunnel and H2K projects, access to the Port's terminals in the southeast harbor must be available both during truck gate operations and when labor needs to work a ship at dock. This could occur any day of the week or hour of the day. Construction closures or detours that affect access must be coordinated with the Port and our terminal operators.
- During renovation of the Alaskan Way Surface Street and the waterfront, how well does the system meet the connectivity needs for Northwest Seattle and the estimated 35,000 vehicles per day that now use Elliott/Western/Battery Street ramps?
- Clipper Navigation operates passenger vessels with significant passenger pick-up and drop-off activity as well as fleet provisioning on the north apron. Landside access to the P-69 sidewalk is critical for passengers and employees. Access to the north apron of P-69 is also critical for

Clipper provisioning, taxi queuing and ADA parking. Do the high traffic volumes of detour traffic on Alaskan Way interfere with the passenger access and northbound left turns accessing the pier?

- Will there be any construction-related closures or capacity reductions at the Bell St parking garage two access and egress spots on Elliott Avenue or the one on Wall St.? If so, how will they be mitigated?
- What are the cumulative impacts of other projects that may be under construction concurrently?

Freight mobility (including rail operations on mainline tracks)

- The Port's container business, Boeing, and many other industrial businesses, the City's garbage removal, as well as Amtrak, and Sounder depend on the functionality of BNSF's rail mainline along the north waterfront. Would train traffic at the train tunnel portal be affected and interrupted by Viaduct demolition or Connector construction activities? Please describe the potential impacts to rail operations and mitigation to minimize these impacts. What provisions are made to ensure train movement during Elliott/Western Connector construction?
- The rail mainline along the north waterfront blocks Wall, Vine, Clay and Broad Streets for significant periods of the day. Train crossings along the north waterfront area can substantially increase vehicle delay along Alaskan Way, cause congestion along the waterfront and affect the reliability of this important freight route. A detour route which uses any of these streets during demolition of the viaduct and construction of the Elliott/Western Connector must anticipate and mitigate those crossing blockages. How will this be addressed?
- What route will be used by construction trucks removing the viaduct demolition spoils? How could that construction traffic affect operations of key intersections along the south end of the waterfront and in the Duwamish?

Cumulative impacts

- What is the likelihood and what would be the impacts if viaduct demolition overlapped with completion of seawall construction?
- What are the cumulative impacts of other projects that may be under construction concurrently, e.g. 1st Avenue Streetcar, Colman Dock Replacement, or South Transit Pathway?
- The construction plans developed to date suggest that the demolition of the Viaduct (in the area between Pine Street and Battery Street) and construction of the new Battery-Pike Connector will take place over 1-2 years. During this time (early 2016-2017) traffic not opting to use the newly opened bored tunnel will use Alaskan Way, and other north south arterials through downtown. Additionally, central seawall construction may be in progress. How will the system operate? What are the impacts on freight and trucks, and in particular over dimension loads and hazardous cargo movements?

III. Land Use

Development of the newly formed parcels south of S. King Street at the south portal near S. Dearborn, S. Plummer and S. Charles Streets (the former WOSCA site), must be compatible with the adjacent land uses at T-46 (west of Alaskan Way, between S. King and S. Atlantic Streets). Operations at the 88-acre T-46 are among the oldest working waterfront uses in the area and contribute significant city and state economic benefits. The terminal is located on a site built and committed to industrial shoreline use. The noise, light and traffic impacts from this existing industrial use occur 24-hours/7-days per week. The Port has been and will continue to oppose residential development at this site in the industrial/commercial zone. 2009 state legislation (HB 1959) declares that local land use decisions should be made in consideration of long-term and widespread economic contribution of our international container ports and related industrial lands and transportation systems. The Container Ports Element of Seattle's Comprehensive Plan, adopted in

2012, is intended to implement state law and articulates the need to protect and enhance Port operations. Any changes to land use envisioned to support the Central Waterfront Project must address this question:

- What are changes in land use at the south end of the waterfront that may have adverse effects on marine cargo uses and activities? This includes potential zoning changes for the WOSCA site and the potential redevelopment of P-48.

IV. Economic Impact



- The new corridor will serve as the only Major Truck Street and hazardous materials and overlegal route through downtown, connecting the City's remaining MICs. What is the impact of the proposed design of the corridor on the viability of the maritime and industrial businesses that depend on it? How does the system design support the Seattle economy, in particular maritime and industrial jobs and international trade flows?
- How does system design support the needs waterfront businesses, in particular tourism visits, parking and provisioning trucks?
- Tolling the bored tunnel might divert traffic from the tunnel to Alaskan Way. How much traffic would be added to Alaskan Way and the Connector before the system is complete, if the tunnel were tolled during viaduct demolition/connector construction?

Attachment A, "Port of Seattle Specific Facilities and Related Terminals issues, Sept 2013 Update" provides more site specific description of existing uses and operations relative to the use and construction of an Alaskan Way surface street and Elliott/Western Connector.

Attachment B, "Current comments on Waterfront Seattle design concepts for Alaskan Way Roadway," dated 9/6/13 provides very specific comments on Design of the new Pine/Elliott/Alaskan Way intersections, current design concepts for the Lenora Street Pedestrian Bridge, design of bicycle and pedestrian facilities north of Pine, and access to the P-66 cruise terminal during construction of the new roadway.

While we have expressed concerns about potential impacts of the surface street and connector, we want to ensure that the project moves forward as it is a once-in-a-lifetime undertaking to modernize our central waterfront. We look forward to continuing our working relationship in this environmental review. We must find a solution that provides the needed transportation system functionality for the Port and the City. Please do not hesitate to contact Geraldine Poor at 206-787-3778 or poor.g@portseattle.org, or Christine Wolf at 206-787-3458 or wolf.c@portseattle.org, with any questions or concerns.

Sincerely,

	
Geraldine H. Poor	Christine Wolf
Regional Transportation Manager	Seaport Transportation Planner
206-787-3778	206-787-3458

cc: Port of Seattle: Beckett, Akiyama, McWilliams, Styrk, Goodwin, Graves. M. Burke, Merritt

Attachment A: Port Specific Facilities'/Terminals' program related issues, 9/18/13

A. Nearby Port of Seattle properties:

LOCATION	ACCESS NEEDS or other ENVIRONMENTAL ISSUES
Pier 69: (2711 Alaskan Way) Port Headquarters Victoria Clipper passenger terminal Arctic Storm	Port employees/visitors walk, bus or park in the Bell Street Garage, 2 blocks south. Metro Route 99. Victoria Clipper passengers also park remotely. Significant numbers queue on Alaskan Way in front of Pier 69 for pick-up/drop-off, along with taxis & town cars. Those using SR99 depend on the Western, Elliott and/or Battery Street ramps.
Bell St. Pier (World Trade Center) Parking Garage	2 entries and 3 exits: at Wall Street, and off Elliott Street at Art Institute and Bell Street.
Pier 66, Bell St Pier Complex: International Conference Ctr Restaurants/deli Public plaza Short-stay public marina World Trade Center Parking facility Pedestrian Overpass Cruise ship terminal	Most visitors/employees park in the Bell Street Garage. <u>Cruise:</u> Buses (charter/public), taxis, town cars, & private vehicles all provide landside access for passengers. The terminal operates with street use permits for on-street taxi queues, etc. The majority of passengers connect directly to STIA. Provisioning trucks serve the ship on homeport days at scheduled appointments. Data has been supplied to team & we're available to supply specific data requests throughout the study. Those using SR99 depend on the Western, Elliott &/or Battery Street ramps.
Container Terminals/Intermodal Rail Yards in the Harbor (Terminal 46, T-25/30; T-5 & T-18 North- and Main-SIG and Argo intermodal yards)	Terminal 46's main gate is located at the intersection of Alaskan Way and S. Atlantic St. The King St Driveway provides access for headquarters, terminal labor, and emergency access to the terminal. Construction activities can potentially impact the northern terminal access, as can the final configuration, the bike path connection and use of surplus land. In addition, all terminals and railyards are dependent on the ability of the local street system in the Duwamish to move freight.
The Port also owns/maintains <u>multiple public access points</u> , Lenora Street Pedestrian Overpass and Bell Street Ped. Overpass (see Pier 66 above).	
<u>Outlying Port Properties:</u> The impact of this project will stretch throughout the City of Seattle. While some of our properties seem quite distant to the streets' footprint, it provides an important corridor for facilities on the west side of the region: Sea-Tac International Airport passengers/airfreight use the SR99/509 corridor to/from Seattle to access the airport; Shilshole Bay Marina and Fishermen's Terminal, two sites on the west end of the Lake Washington Ship Canal, historically have relied on the corridor for access to/from the south.	

Attachment B: Recent staff comments on Waterfront Seattle design concepts for Alaskan Way Roadway, 9/6/13



September 6, 2013

Mr. Michael Johnson
City of Seattle, Department of Transportation
Mike.Johnson@seattle.gov

Subject: Current comments on Waterfront Seattle design concepts for Alaskan Way Roadway

Dear Mike:

Many thanks for meeting with us to review our concerns regarding the conceptual designs for the new roadway along the Central Waterfront (Jul 26 with Andrew Barash), and the City's current design options for the Lenora Street Pedestrian Bridge (Aug 8 with Andrew Barash and Jon Layzer). We look forward to ongoing coordination with you, but want to summarize a number of our discussion points in writing.

Before delving into the details, we'd like to restate the Port's goals for these components of the Central Waterfront project:

- Ensure that the new street will meet our needs for Port property access, freight mobility and regional traffic; and provide efficient and safe access/egress for provisioning trucks and other related traffic for our cruise terminal at Pier 66.
- Retain the function and signature feature character of the Lenora Street Bridge as a major pedestrian connection between our Pier 66 Bell St. Pier and cruise terminal and Pike Place/downtown without negatively affecting traffic on the new Elliott/Western Connector, or maintenance of the structure.

Both of these goals are consistent with our written comments over the course of several years of environmental and planning documents, as well as many discussions during both staff and public meetings. This letter summarizes the results of the discussions during the two meetings, and expands on some of the issues we raised:

- A. Design of the new Pine/Elliott/Alaskan Way intersection
- B. Current design concepts for the Lenora Street Pedestrian Bridge with regard to:
 - Change to an at-grade pedestrian crossing
 - Maintenance costs and access
- C. Design of bicycle and pedestrian facilities north of Pine, both on the new Elliott/Western Connector and along Alaskan Way
- D. Ensuring access to the cruise terminal at Pier 66 during construction of the new roadway along the Central Waterfront



A. Design of the New Pine/Elliott/Alaskan Way Intersection

In recent weeks, we have provided focused input on the emerging design concepts for the new intersection at Pine St, the Elliott/Western Connector and Alaskan Way, at the Pike Place and Aquarium Fold. This was also the main subject of our meeting on Friday 7/26, which covered three issues:

- a) The design vehicle for truck turning movements for all legs of the new intersection;
- b) Roadway grades for all legs of the intersection with a view to impacts on truck movement; and
- c) Traffic sensitivity analysis to ensure that the new intersection can handle cruise traffic volume surges.

The grades appear to be workable (item b above), if not desirable, based on other freight streets in the city. Mike and Andrew acknowledged that the traffic modeling (issue c) to date did not take into account the peak volumes of cruise traffic, which occur on both workweek and weekend days. Mike assured us that modeling efforts for the upcoming environmental review would include the necessary sensitivity analyses, which may require design adjustments to accommodate turn movements.

This leaves the issue of (a) access for large trucks (WB-62 and WB-67 in particular) to Pier 66¹. Trucks bearing provisions for multi-day cruises are typically coming from Terminal 91 in Interbay, where they are staged until it is time for their delivery appointment at Pier 66. The Pier 66 Cruise Terminal operates with passenger flows on the SB/westside of the street (taxis, limos, charter buses, private drop-off/pick-up) and truck provisioning on the NB/eastside of Alaskan Way². This is a delicate operation that has been designed to maximize load/unload efficiencies while minimizing the impact on general purpose traffic.³ When trucks leave P-66, they usually head south for freeway access.

Large trucks cannot access Pier 66's apron from the north (SB Alaskan Way) because SB to WB turns from the SB lanes of Alaskan Way are physically constrained by several factors: truck turning radii, the apron's geometry and complex structural support system underpinning the pier, and the location of a utility pole and other infrastructure. Trucks must be staged in the outside of the two NB lanes on Alaskan Way to be able to make the turn onto the secure area of the apron. Changes to the apron and other infrastructure to facilitate a SB truck entry were reviewed during the design of the terminal and found prohibitively expensive. In addition, changing the path of trucks would likely conflict with passenger loading operations occurring to the north of the apron.

Since trucks must approach from the south, the most direct way from T-91 to P-66 would be SB on the Elliott/Western Connector, with a turn WB to NB at the new Pine intersection. To our disappointment, Mike and Andrew informed us that, due to current design constraints, this movement is not possible for larger trucks (WB-50 and above?), but that they would explore what could be done to maximize the size of truck that could make the turn. We appreciate that effort and will work with you to find the design that allows trucks to make the northbound turn onto Alaskan Way.

Our concern is that trucks that cannot make that turn would be permanently required to go as far south as S Atlantic St. (as they do today in the interim condition) and come up all 14 blocks of the new Alaskan Way to make deliveries to P-66. Mike suggested that the appropriate path for provisioning trucks coming from Terminal 91 might be I-5. We do not think that is a viable solution. The additional truck time to route over to I-5, or paying tolls for the tunnel to go a longer distance, would add significant

¹ There are on average 30 trucks per home port call, and about 50% of these will be WB 62 or 67.

² Attached is our traffic control plan.

³ The traffic control plan was last reviewed, and subsequently revised in 2009.

costs to the delivery companies' operations, and increase the number of trucks moving on city streets and through the central waterfront. In parallel, we expect others will share our interest in minimizing the routing of large provisioning trucks along the waterfront.

B. Current design concepts for the Lenora Street Pedestrian Bridge

Thank you for sharing the current design concepts for the Lenora Street Pedestrian Bridge during our August 8th meeting. We have since shared these concepts internally with both our maintenance and engineering staff, the following outlines our concerns with these concepts.

Change to an at-grade pedestrian crossing

The current pedestrian crossing of SR-99 at Lenora is grade-separated. The proposed change from the currently grade-separated to an at-grade pedestrian crossing of the Elliott connector at Lenora continues as a Port concern as it creates new pedestrian/street conflicts. We are particularly worried about its impact on the functionality of the new Connector as a Major Truck Street, since the current design concept would force trucks to stop and start on an almost 7% grade when they are caught on the hill. This is a likely occurrence even if the signals along the corridor are timed. This concern is compounded by the potential of an uphill bike lane on the hill—more about this issue below.

Maintenance costs and access

Our maintenance and inspection needs for the Lenora Street Pedestrian Bridge appear to be un-met under your current Options 2, 3 and 4. Our maintenance crews regularly require access to drive down Lenora and onto the bridge with machinery and equipment for pressure washing, elevator mechanical repair/replacement, vegetation maintenance, and/or tile repair. Most of these functions could not be completed from below, and those that could would increase maintenance costs. Similarly, under-side bridge inspections require more room for equipment access than is provided in Options 2 or 3. Option 4 raises exactly the concerns foreseen by your consultant firm about structural integrity of a tension span bridge if one span were removed/replaced.

Another alternative option/concept appears to us to move the Elliott/Western connector farther to the east at Lenora Street than the current concept design indicates, to allow the western edge of the road to meet the eastern edge of the bridge at its current elevation. An alternative would be to move the sidewalk and bike facilities to the eastern side of the road. Either of these would require additional design work to see if the concept is possible.

C. Design of bicycle and pedestrian facilities north of Pine

Alaskan Way

During the 7/26 meeting, we expressed concerns about the bicycle track location on the west-side of Alaskan Way between Pine and Virginia. The current design shows cyclists crossing Alaskan Way at Virginia to tie into the existing multi-use path on the east side of street. Even today, without a west-side cycle track, a significant percentage of cyclists continue riding on the west-side sidewalk along the entire waterfront. There are existing conflicts with sidewalk riders mixing with cruise and Clipper operations, and we know of at least one bike-pedestrian accident in which the rider hit and hurt a pedestrian on the sidewalk near our headquarters at Pier 69. The future cycle track is bound to increase the number of riders along the waterfront—and a higher percentage of them will be less experienced. Please consider

moving the cycle track to the east side at Pine (farther south) to reduce the potential for conflict and injury. (The current concept design for the roadway along the northern segment of the seawall already includes an eastside cycletrack or multi-use path.)

Elliott/Western Connector

We were also concerned that the current design concept retains a NB bicycle lane and SB sharrow for the new Elliott/Western Connector. From our point of view, the grade, designation as a Major Truck Street (the only one connecting the City's two MICs) , and general traffic volumes along the Connector should strongly caution against that design. If there is solid support for a bicycle facility on this hill, it might be worthwhile to determine the viability of a multi-use path on the east side instead of the combination of sidewalks on both sides, plus bike lane and sharrow in the street. Removing the sidewalk on the west side may also address some of the maintenance access concerns related to the Lenora Street Bridge outlined above.

D. Ensuring access to the cruise terminal at Pier 66 during construction

We are also concerned about the ability of all modes to access and serve P-66 during demolition of the Viaduct and construction of the Elliott/Western Connector. Operation of the terminal requires a street use permit that reduces Alaskan Way to one lane in each direction in front of the terminal. We cannot envision how the cruise terminal could operate with 24,000 vehicles per day detouring in front of it during the projected 18 months of Viaduct demolition and construction of the Elliott/Western Connector. (We have similar concerns about the second phase of seawall construction.)

We realize that construction traffic management plans for intermittent operations like our cruise terminal are generally left to the construction team. We urge you to be more pro-active and include consideration of these issues in the design phase and in the coordination effort for Viaduct demolition with WSDOT.

Thank you again for the opportunities for face to face conversation. We look forward to setting a next meeting to continue working to resolution, but wanted also to provide out our concerns and perspectives to you in writing.

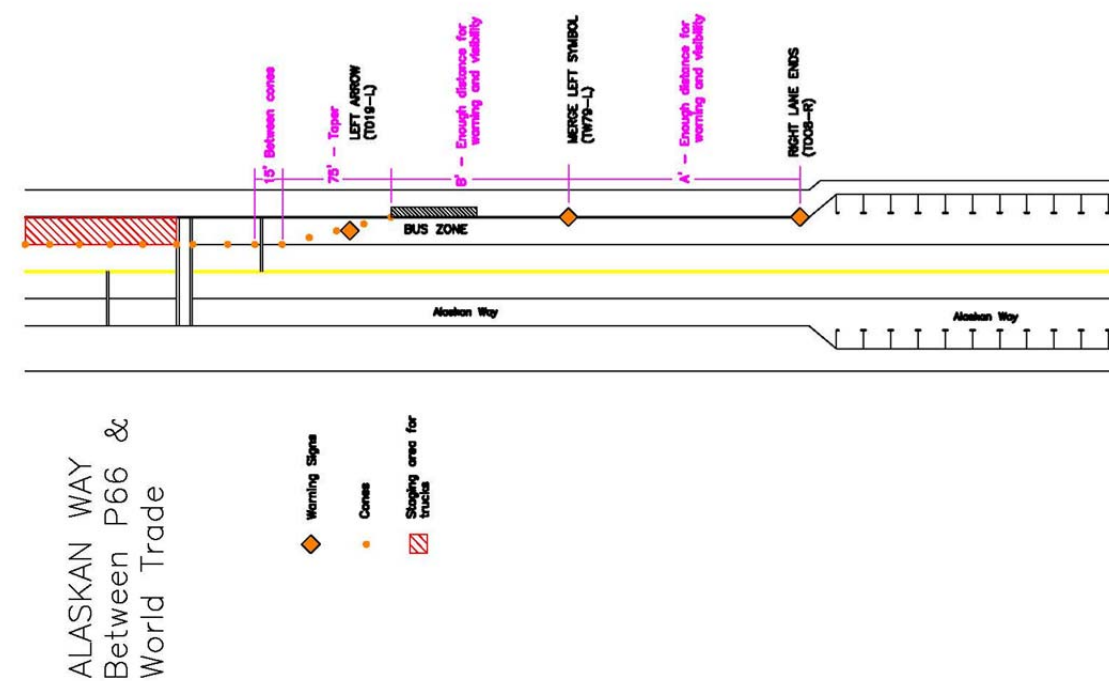
Sincerely,



Geraldine H. Poor
Regional Transportation Manager

Cc: Brady, Layzer, Pearce, Chandler

Port - McWilliams, Maruska, Merritt, M. Miller, Pulsifer, Wolf
Heffron Transportation
CH2M-Hill - Barash





September 25, 2013

Peter E. Hahn, Director, Seattle Department of Transportation
c/o Mark Mazzola, Environmental Manager
PO Box 34996
Seattle, WA 98124-4996

RE: EIS Scoping Comments on the Waterfront Seattle Project

Thank you for the opportunity to comment on the proposed scope of the environmental impact statement (EIS) to be prepared by the Seattle Department of Transportation for the Waterfront Seattle-Alaskan Way/Promenade/Overlook Walk project.

We request that the Transportation Element's scope include a detailed analysis of future travel demand needs for the waterfront specifically related to short trip making north and south along the extent of waterfront area as well as travel needs to and from nearby transit networks and other downtown destinations. This evaluation should include consideration of bike sharing to meet those transportation needs. The role of bike sharing should be considered as part of the analysis as a tool to provide direct, on-demand, non-motorized access to popular destinations and businesses located along the waterfront.

Bike sharing helps achieve many other community goals like extending the reach of public transit, activating public spaces, creating local jobs and introducing more people to bicycling. Bike sharing gives more city residents living in denser urban areas access to bicycling without bearing the full costs of ownership, storage and maintenance. We would be happy to provide additional information regarding the value and performance of bike share systems.

Puget Sound Bike Share (PSBS) is a nonprofit working with the support of local government agencies to bring a bike-sharing system to the Seattle area. The first phase of the program, scheduled to launch in spring 2014, will include 50 bike-share stations and 500 bikes near Seattle's most popular urban destinations. The Seattle Waterfront is planned to be served by bike share stations in early phases of the program. More information can be found at: www.pugetsoundbikeshare.org.

We are happy to assist in the preparation of the EIS by providing more information about PSBS's program and analysis associated with bike share programs in other North American cities. Feel free to contact me by email at hollyhouser@pugetsoundbikeshare.org or by phone at (206) 607-8816.

Sincerely,

A handwritten signature in black ink, appearing to read "Holly Houser", with a stylized flourish at the end.

Holly Houser
Executive Director
Puget Sound Bike Share

Peter E. Hahn, Director
Seattle Department of Transportation
c/o Mark Mazzola, Environmental manager
PO Box 34996
Seattle WA 98124-4996

Dear Mr. Hahn,

Thank you for the opportunity to provide feedback on your scoping process for Waterfront Seattle regarding Alaskan Way, the promenade and overlook walk.

The Puget Sound Partnership is charged with protecting and restoring Puget Sound by 2020. To help keep us all on track towards achieving this goal, the Partnership, with substantial input from the Puget Sound community, adopted ecosystem recovery targets. We ask that the EIS address how this project contributes to achieving these targets. You can find the full list of the ecosystem recovery targets at <http://www.psp.wa.gov/vitalsigns/>.

The Partnership has also identified three region-wide priorities to protect and restore Puget Sound. Two are relevant to this project and include:

- Preventing pollution from urban stormwater runoff from roads, roofs, parking lots, and other paved areas. Polluted runoff is the biggest threat to Puget Sound's water quality.
- Protecting and restoring habitat to save salmon and other marine and freshwater species and to honor tribal treaty rights.

Although we understand from the public scoping notice that no work will be done in Elliott Bay, we encourage the city and SDOT to consider an alternative that takes advantage of this opportunity to use green methods during development of the project, in particular the promenade, to minimize the harmful effects of the existing hardened shoreline, apply soft shoreline techniques; develop marine habitat that enhances the ecological functions of the shoreline and create public access to the incredible shoreline that showcases Seattle. We encourage SDOT consider similar measures as outlined in the city's green shoreline guidance manual for Lake Washington.

In addition, as a way to evaluate options, we suggest that SDOT calculate how each alternative will reduce the volume of stormwater runoff discharged to Puget Sound, and the volume that will discharge to the city's combined sewer/stormwater system. These calculations will help assess how each alternative prevents the stormwater runoff thereby avoiding water and sediment quality impacts into the future.

The DEIS should also address the following:

1. Transportation and Land Use elements of the EIS:

We encourage you to address appropriate stormwater management to minimize off site impacts that are consistent with state stormwater NPDES requirements and associated stormwater manuals.

Specifically, we encourage you to use Seattle's green stormwater infrastructure protocols towards this end.

2. Hazardous Materials element of the EIS:

The Puget Sound Action Agenda includes strategies to prevent, reduce, and control the sources of contaminants entering Puget Sound. Specifically, it includes a near term action for reducing the discharge of persistent, bioaccumulative, and toxic substances (PBTs). We encourage SDOT to follow recommendations for reducing the discharge of Polycyclic Aromatic Hydrocarbons (PAHs) included in the state Department of Ecology's PAH Chemical Action Plan.

The Puget Sound Action Agenda also directs the state Department of Ecology to complete a statewide anti-idling regulation to reduce petroleum emissions to the air. The regulations are designed to reduce diesel soot, PAHs, and greenhouse gases from petroleum-powered engines and equipment. We recommend that the EIS address how this project will comply with this regulation.

In particular, any project activities that could impact marine sediment quality should address how the project will align with the sediment quality ecosystem recovery targets for Puget Sound, namely to: a) Achieve chemistry measures reflecting "minimum exposure" with Sediment Chemistry Index (SCI) scores >93.3; b) Have no sediment chemistry measurements exceeding the Sediment Quality Standards (SQS) set for Washington state; and c) Achieve the following: Sediment Quality Triad Index (SQTi) scores reflect "unimpacted" conditions (i.e., SQTi values >81). The threshold criteria for "unimpacted" sediments has been revised from 83 (when the Leadership council adopted the target in 2011) to 81, based on quality control checks indicating the original calculation was incorrect.

3. Water Quality element of the EIS:

Similar to the comments above, any activities that could impact marine water quality should address how the project will be consistent with the marine water quality ecosystem recovery target for Puget Sound, namely to: Keep dissolved oxygen levels from declining more than 0.2 milligrams per liter in any part of Puget Sound as a result of human input.

4. Vegetation and Wildlife element of the EIS:

Similar to the comments above, any activities associated with this project that could impact marine vegetation and wildlife should address how the project will align with the following ecosystem recovery targets for Puget Sound, namely to: 1) Minimize impacts to native eelgrass in Elliott Bay to "help increase the acres of eelgrass in Puget Sound by 20 percent from the 2000 to 2008 baseline period" and 2) Keep contaminant levels in fish will be below health effects thresholds (i.e. levels considered harmful to fish health or harmful to the health of people who consume them).

Please call me at 360-628-2428 if you have questions or need clarification regarding these comments.

Sincerely,

Kevin Anderson
EPA Program Manager/ Senior Invasive Species Policy Advisor

cc: Jim Bolger, Director, Soundwide and Functional Programs



City of Seattle
Seattle Department of Neighborhoods
Bernie Agor Matsuno, Director

LPB 644/13

September 25, 2013

Peter E. Hahn, Director, Seattle Department of Transportation
c/o Mark Mazzola, Environmental Manager
PO Box 34996
Seattle, WA 98124-4996

RE: Waterfront Seattle: EIS Scoping Comments

Dear Mr. Hahn:

The following are Waterfront Seattle EIS scoping comments relating to Historic Preservation:

- Any proposed changes to the exterior of buildings, sites, or to the public right-of-ways, (including areaways within Pioneer Square) located within either Pioneer Square or the Pike Place Market historic districts requires a Certificate of Approval from the relevant Board or Commission. Please contact Genna Nashem regarding Pioneer Square or Heather McAuliffe regarding Pike Place Market. This would include changes proposed by Storefront Seattle projects.
- Any proposed changes to the exteriors of designated City Landmarks will require a Certificate of Approval from the Landmarks Preservation Board. Please contact Sarah Sodt regarding downtown Landmarks.
- Work that is conducted adjacent to a designated City Landmark may require adjacency review by the City Historic Preservation Program staff per the City's SEPA policies-- please see CAM 3000.
- A new pedestrian bridge, or changes to the existing pedestrian bridge adjacent to the Colman Building will require a Certificate of Approval from the Landmarks Preservation Board, as well as SEPA adjacency review. Any changes or new design should be developed using the Secretary of the Interior Standards for Rehabilitation in consultation with the Landmarks Preservation Board and staff.
- It is our understanding that interior alterations are proposed to the waterfront Fire Station No.5 with only minor exterior alterations. If major exterior alterations are proposed then a landmark nomination should be prepared given that the Fire Station No. 5 has been previously determined eligible for landmark status.
- Although there currently is no planned use of federal money for the Waterfront Seattle project, if the funding changes to include federal funds, or if a federal permit or other federal undertaking is required prior to the completion of the project, then NEPA may be required, as well as Section 106 and 4f review.



- A monitoring plan should be put in place in coordination with Historic Preservation Program staff to ensure that buildings within the districts, as well as individually designated City Landmarks are monitored for potential damage during any adjacent construction.

The following potential impacts should also be considered:

- The economic impact on the Pioneer Square Historic District during construction; as well as the permanent impact of the proposed eight-lane road (freight, ferry lines, Metro transit lanes) which may cause the District to appear inaccessible during and after construction, and therefore impact business and other uses within the District.
- The permanent physical impact on the Washington Street Boat Landing due to its isolation from the Pioneer Square Historic District when the proposed eight-lane roadway between the District and the Boat Landing is completed.
- The impact of work on Washington and Main Streets to the areaways, public rights-of-way, and landscaping (trees) in Pioneer Square Historic District.
- The impact of any new construction adjacent to the Pike Place Market Historical District, to ensure that the character defining features of the District remain easily differentiated from any new construction.

Please contact me at sarah.sodt@seattle.gov, or at 206-615-1786, if you need clarification or have any questions.

Sincerely,

Sarah Sodt
Landmarks Preservation Board Coordinator

Katheryn Seckel

From: Upland EIS Scoping <uplandeisscoping@waterfrontseattle.org>
Sent: Thursday, September 26, 2013 3:11 PM
To: Katheryn Seckel
Subject: Fwd: DPD comments on Sope for Waterfront EIS

----- Forwarded message -----

From: **Meier, Dennis** <Dennis.Meier@seattle.gov>
Date: Wed, Sep 25, 2013 at 4:37 PM
Subject: DPD comments on Sope for Waterfront EIS
To: "UplandEISscoping@waterfrontseattle.org" <UplandEISscoping@waterfrontseattle.org>

Down to the wire on comments.

Land Use

The EIS should address impacts of the proposed redesign of Alaskan Way on access to abutting properties, particularly with regards to existing uses that currently use areas that will abut the new Alaskan Way alignment for parking, outdoor storage, vehicular access and loading and service access. How will these functions be accommodated in the future.

Identify potential impacts of proposed public improvements in the project area, such as hillclimb assists on Union and Seneca Streets, redesigned Marion Street pedestrian bridge, and Columbia Street transit area, that could have negative impacts on existing or future uses on adjacent properties.

Disclose likely impacts on existing uses resulting from various phases of construction activity.

Discuss implications of project on potential long-term changes to land use patterns, such as greater intensification of development in adjacent areas due to waterfront improvements, transition to different uses, such as from commercial to residential, etc.), recognizing that the proposed action does not include changes to existing zoning.



City of Seattle

Mike McGinn, Mayor

Seattle Freight Advisory Board

Warren Aakervik, Chair

Linda Anderson

Bari Bookout

Katherine Casseday

Terry Finn

Anne Goodchild

Timothy Hillis

David Mendoza

Mike Sheehan

Robert Smith

Cameron Williams

The Seattle Freight Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the City in development of a functional and efficient freight system and on all matters related to freight and the impact that actions by the City may have upon the freight environment.

City Council Resolution
31243

September 20, 2013

Peter E. Hahn

Director, Seattle Department of Transportation

c/o Mark Mazzola, Environmental Manager

P.O. Box 34996

Seattle, WA 98124-4996

RE: Seattle Freight Advisory Board Comments on Scoping for Waterfront Environmental Impact Study

Dear Peter,

Seattle City Council Resolution #31243 states: "The Seattle Freight Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the City in development of a functional and efficient freight system and on all matters related to freight and the impact that actions by the City may have upon the freight environment."

SFAB would like to submit comments on what should be included in scope of the Environmental Impact Statement for the Seattle Waterfront Redesign Project. The corridor along Alaskan Way is the only Major Truck Street connecting the City's two Manufacturing-Industrial Centers, the Ballard-Interbay Industrial Manufacturing Center (BINMIC) and the Duwamish Manufacturing and Industrial Center (MIC). Combined, these two MICs support almost 78,000 jobs. They generate almost \$4 billion in wages, \$98 million in taxes, and business revenue in excess of \$30 billion. The corridor is also the only viable connection for the movement of hazardous and oversized loads between the MICs. The fuel that is trucked from the terminus of the Olympic Pipeline on Harbor Island to the BINMIC supplies the fishing fleets home-ported at the Port's Terminal 91 and Fishermen's Terminal. Together, they are responsible for 50% of the white fish consumed in the US. The Alaskan Way corridor is critical for commerce, and your analysis must ensure that commerce's needs are thoroughly evaluated and addressed.

SFAB is concerned because the City of Seattle currently does not have a Freight Master Plan to complement the Bicycle, Pedestrian and Transit Master Plans. These existing plans are clearly advising planning and design decisions, including the Waterfront Design. This is putting freight at a disadvantage in this process, despite the importance of the corridor in ensuring the viability of the City's MICs. From SFAB's point of view, that disadvantage is made obvious by the current design, which does not adequately consider the importance of maintaining capacity for, and anticipating future growth in, freight movement through this corridor. The corridor must provide the capacity necessary to maintain and improve the efficient movement of freight between the MICs and continue to support the movement of hazardous and over-legal cargo through downtown. Freight mobility cannot be overlooked, or relegated to a minor goal, in the effort to entertain all modes in this corridor and support the development of a waterfront for all.

Seattle Municipal Tower, 700 5th Avenue, Suite 3800, PO Box 34996, Seattle, WA 98124-4996

Tel: (206) 684-4103 Tel: (206) 684-5000 Fax: (206) 684-5180

Web: www.seattle.gov/sfab/

An equal opportunity employer. Accommodations for people with disabilities provided on request.

The two MICs comprise a substantial share of the tax revenue for the City. That tax revenue is essential in supporting the City's ability to fund maintenance and services, including those that will be needed to keep the new waterfront in ship-shape.

We ask that the EIS perform a detailed analysis of the ability of the corridor to support existing freight traffic and to accommodate future growth. The analysis should include potential economic impacts to the existing industries in both MICs, especially if businesses are forced to relocate out of the City due to increasing freight mobility issues. The analysis for freight traffic should include operations throughout the day, not just the peak period, since freight movement is time-sensitive throughout the day.

Your analysis should address SFAB's most critical areas of concern:

1. The freight and general purpose through traffic impact of a design that includes fewer than two general purpose lanes in both directions south of Colman Dock. Freight mobility relies on available general purpose lanes, free from blockages. There should be two general purpose lanes along the entire corridor.
2. Impact to through freight traffic from ferry queuing and spillover into general purpose lanes. This includes analysis to ensure the provision of adequate ferry queuing lanes south of Colman Dock.
3. The impacts of proposed lane widths along this corridor, both with regard to through- and parking-lanes. All through lanes should have full width at 12 feet to ensure that two trucks can pass each other safely. Parking lane width, especially on the east-, north-bound side, should accommodate larger delivery vehicles to prevent negative impacts on the outside traffic lane.
4. The grade on the Elliott & Western connection and impact that the proposed at-grade pedestrian crossing at Lenora would have on the flow of truck traffic as it must stop and restart while on a grade. This issue concerns both safety and truck operation. To a somewhat lesser extent this also applies to the proposed bike lane/sharrow on the connector.
5. The turning radii at the new Pine/Alaskan Way/Elliott-Western Connector intersection, as trucks attempt to connect from both the south and north to the northern end of Alaskan Way. There is also an issue with the tie-on from south-bound Alaskan Way to the new intersection—it must be able to accommodate traffic surges that will occur.
6. Access to Port of Seattle terminals at the South end of this corridor and any impacts that ferry queuing might have on the flow of traffic in this area.
7. Impact to traffic caused by lack of adequate parking facilities as cars slow and circle in search of places to park. Parking supply should be assessed for the Waterfront to ensure it can support local businesses and minimize impacts on through-traffic.
8. Impact to truck traffic from in-street bus stops, or worse, inside-lane street-car stops interrupting flow in the lane unaffected by right-turn movements.
9. We also urge you to include an in-depth analysis of the impact on freight mobility on this Major Truck Street during demolition of the Viaduct/decommissioning of the Battery Street Tunnel and construction of the new Elliott-Western Connector. Most trips in the corridor are currently grade-separated from the railroad tracks because they use the Viaduct. There could be in excess of 20,000 vehicles using Alaskan Way instead of the new tunnel, conflicting with rail and cruise operations. What are the options for mitigating that impact?

The Seattle Freight Advisory Board is committed to working with SDOT and the design team to continue to explore acceptable solutions in this critical freight corridor.

Sincerely,

A handwritten signature in black ink, appearing to read "Warren Aakervik, Jr.", with a stylized, cursive script.

Warren R. Aakervik, Jr.
Chairman, Seattle Freight Advisory Board

Aesthetics/Light and Glare

Discuss the loss of the Alaskan Way Viaduct as a designated scenic route.

Identify view impacts of project proposals on designated view corridors, including improvements in the street rights-of-way of view corridors (hillclimb assists in Seneca Street, new pedestrian bridge in Marion Street).

September 25, 2013

ELAINE L. SPENCER
(206) 340-9638
espencer@grahamdunn.com

Via Email And Regular Mail

Peter E. Hahn, Seattle Department of Transportation
c/o Mark Mazzola, Environmental Manager
PO Box 34996
Seattle, WA 98124-4996

Re: Comments on the scope of the EIS for the proposed Waterfront Seattle Project

Dear Mr. Hahn and Mr. Mazzola:

This letter is submitted on behalf of the Seattle Historic Waterfront Association (“SHWA”), which appreciates the opportunity to comment on the scope of the EIS for the proposed Waterfront Seattle Project (“Project”). SHWA is composed of the private historic piers along the Seattle Waterfront and the businesses that operate within and alongside those piers. We have, as you know, described the facts that are relevant to the members of SHWA in numerous letters related to the environmental review of the viaduct replacement and seawall replacement projects.¹ We would direct you to those letters for detailed descriptions of the elements of the environment that are most critical to SHWA’s members. As always, the SHWA is also available to meet with you or your consultants as needed to insure that they have the information to create a proper foundation for the EIS.

An EIS is intended to be a useful tool in helping the community at large, as well as the public decision-makers, to fully understand the environmental consequences of public actions, and the alternatives that are available. The decisions that are made concerning the Project will have a profound effect on the quality of the City for many decades in the future, and certainly warrant a close and complete understanding.

¹ See, e.g., our letter dated September 22, 2006 commenting on the Draft Supplemental EIS for the Alaskan Way Viaduct and Seawall Replacement Project, our letter dated September 24, 2008 on the scope of environmental review for viaduct replacement options, our letter dated June 10, 2009 on the scope of the Draft Supplemental EIS on viaduct replacement options, our letter dated December 13, 2010 concerning the adequacy of the October 2013 Draft Supplemental EIS for the Alaskan Way Viaduct Replacement Project, and our letter dated December 13, 2012 commenting on the adequacy of the Draft EIS for the Elliott Bay Seawall Replacement Project.

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The EIS is also particularly important to the businesses and property owners in downtown Seattle in this instance, because the Project is to be funded in substantial part by an L.I.D. based on the special benefit that downtown property owners will receive from the Project. It is therefore particularly essential that the EIS consider the potential adverse impacts of the Project and mitigate or eliminate them, so that the Project in fact creates special benefit, not harm, to the affected properties.

I. The EIS must analyze the impacts of the Project, combined with the earlier Alaskan Way Viaduct replacement project and seawall replacement project, on loss of parking. It also needs to analyze the impact of inadequate parking on the activity level of the waterfront, and the risk of the Project area becoming dominated by homeless camping, drug use and other illegal activity.

The “elements of the environment” that must be considered in an EIS include transportation, parking, movement/circulation of people or goods, police, maintenance, and other governmental services. WAC 197-11-444(2)(b), (c) and (d). In many projects those are not closely related, but in this case, they are, and the EIS needs to acknowledge that.

We have on many occasions described to the City the critical role of parking to the viability of members of the SHWA as well as the visitors to the new park. The EIS needs to fully discuss the loss of parking that has occurred since the beginning of the viaduct replacement project, and how that loss will be mitigated both during construction and longer term.

The loss of parking has become sufficiently severe so that the EIS must also discuss the impact of that loss of parking on police, maintenance of the public spaces, and the risk that the new public spaces will be primarily occupied by homeless camping, drug activity, and other illegal activity. Over the last 30 years, much urban design literature has focused on the importance of insuring that public spaces are activated by people – lots of people. When public spaces are filled with people, they tend to not attract homeless people, drug activity and a variety of other anti-social behavior. By contrast, when public spaces are largely empty, they become comfortable places for the sort of anti-social activity that in turn discourages most people from visiting and using the spaces. There is a tipping point at which the presence of anti-social behavior discourages most people, particularly women, from using a space, and that in turn further causes the space to be relinquished to activity that drives away the majority of people. Seattle has over time experienced that phenomenon with Freeway Park and with Pier 62-63 and Colman Dock. It is critical to the Waterfront that it be filled with people as much of the year as possible.²

² We should note that Seattle Art Museum’s Olympic Sculpture Park, which by all accounts has been highly successful, did not have sufficient foot traffic to keep the Taste restaurant that was originally included in its pavilion in business for more than a year or so. The Olympic Sculpture Park has had no problems with homeless encampments, drug activity or other anti-social activities, because thanks to the incredible \$30 million gift of Jon and Mary Shirley, it has 24/7 security, and being private property, can be closed at night and people who misbehave

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It is critical that the City recognize that Seattle is not Manhattan. Seattle does not have 2 million people living in dense apartments and desperate for fresh air within easy walking distance of the waterfront, as Manhattan has within easy walking distance of The Highline. It does not have transit that serves the waterfront, and has no plans to create significant transit serving the waterfront.³

As we have described in the past, adequate parking is an essential element of a successful destination retail development, which is what fills the current ground floor spaces of the historic piers and the businesses alongside those piers. Unless the lost parking is replaced, the Project will have serious adverse impacts on the value of the historic piers, because it threatens the economic viability of the tenants within them.

The waterfront is a “destination” for most of its visitors, not their neighborhood.⁴ Visitors coming to the waterfront destination often come in family groups. Because of the topography of the city, people coming to the waterfront in family groups, including elderly grandparents with mobility issues or children in strollers, have significant disincentives to come if they must park elsewhere. As we have described to the City on many occasions, a significant portion of the visitors to the waterfront today come from outside of downtown Seattle, come by private automobile, and park within line-of-site of their destination on the waterfront.

While we all hope that the Project will have the impact of increasing the number of people who walk from downtown Seattle to the waterfront, and it will likely cause the number of residential units within a block or two of downtown to increase, the Project will not change the fundamental topography of Seattle, and it will not permit the level of residential density that activates places like The Highline in Manhattan. So unless a significant portion of the on-street retail parking that has been eliminated as a result of the viaduct replacement, the seawall replacement and the Project is restored on the waterfront, the impact of the combination of those three projects is likely to be a reduction in the number of people on the waterfront as compared to before those projects began. That reduction in numbers will tend to encourage the anti-social behavior that comes to public spaces when they are not busy with people. That will increase the demand for police and social services, and will increase the cost of maintenance of the public spaces.

can be and are asked to leave. The City, by contrast, has struggled to control drug activity and other anti-social behavior along the existing waterfront and throughout much of downtown Seattle. In the absence of the ability to devote the resources to security that SAM has devoted to the Olympic Sculpture Park, the Olympic Sculpture Park cannot be assumed to illustrate what will happen when large public spaces are not full of people.

³ The SHWA encourages the City to restore transit along the waterfront, but the trolley will not change the difficulty of getting to and from the waterfront from the rest of downtown that is caused by the grade change.

⁴ This discussion is based on research over 14 years by the Seattle Aquarium, Argosy, Ivar's and the Pike Place Market, much of which has been provided to the City in the past.

September 25, 2013

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The EIS must analyze the impacts of the loss of parking. It must also analyze the impacts of increased occupancy of the waterfront area by homeless individuals and increased drug and other anti-social behavior, on demand for police and social services. Finally, it must explain how the City will finance the on-going maintenance costs of the new public spaces and prevent them from becoming blighted.

II. The EIS should clearly define “the Project.”

By the time the City implements the Waterfront Seattle Project, the Alaskan Way Viaduct will have been closed and removed. The seawall will have been replaced. Those two projects have been subject to extensive environmental review, and have been fully funded. It is misleading to lump them into the Waterfront Seattle Project. The EIS needs to be clear about what is included in the Waterfront Seattle Project, for which decisions are yet to be made.

III. The EIS should include analysis of alternatives and phasing plans that will be implemented if either the L.I.D. does not go forward, the levy is rejected, and/or the hoped for philanthropy does not materialize.

The Washington Legislature has provided \$290 million for the replacement of the Alaskan Way Viaduct, which is currently underway. We understand that some portion of that money is available for removal of the viaduct and replacement of Alaskan Way. The citizens of Seattle approved a \$290 million bond issue that will replace the Alaskan Way seawall, which project is also under way. The remainder of the Waterfront Seattle Project, estimated to cost approximately \$420 million, is unfunded. Proposed funding sources include an L.I.D., philanthropy, a levy and general fund spending. Although the City has control of general fund spending, there is no assurance that the L.I.D., the philanthropy or the levy funds will be available, or that they will be available in time to fund the entire Project in one piece. (In other words, various permutations of funding becoming available could occur – for instance, an L.I.D. could pass in 2014, but a levy fail, and philanthropy not materialize for some years.)

An EIS is required to consider reasonable alternatives that could feasibly attain or approximate the proposal’s objectives, but at a lower environmental cost and decreased level of environmental degradation. Here the critical alternatives to be considered may well be how the City will proceed if the future funding does not materialize at all, and how the City will phase the Project if various pieces of the funding do not materialize until after the 2014-2016 timeframe that is now anticipated. That analysis is important because the lack of some or all of the future funding is a very real possibility and the City clearly cannot simply rewind the clock to before the viaduct replacement and seawall replacement started. The viaduct will come down and Alaskan Way must be replaced. The City will have some money from State funding to replace Alaskan Way, but the City needs to consider now what it will do to maximize the benefit of available funds if not all the desired funds become available. That analysis will also assist both the City and affected property owners in understanding the benefit that will come from funding the proposed L.I.D.

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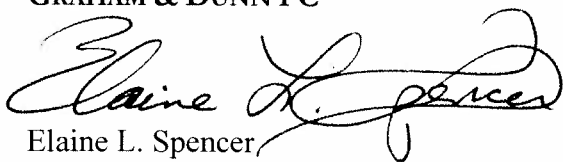
IV. Construction impacts must be mitigated, including at a minimum construction not occurring during the months of June through September.

Although we would hope that the construction of the Project is much quicker and simpler than the viaduct replacement or the seawall replacement, all the points we have made in the past concerning the construction impacts of the viaduct and seawall replacement projects remain true as to this Project. If the parking impacts can be addressed, the construction impacts may be the most significant adverse impacts, and indeed, they can be fatal to the businesses represented by the SHWA. It is important that all of the mitigation efforts that we have discussed as to the seawall be implemented during the construction of the Project as well. Most importantly, construction cannot occur during the months of June through September.

Again, thank you for considering these comments. The EIS for the Project will be an important tool in insuring full understanding of the Project and in guiding the decisions of both public officials and the public at large in this effort to make positive change for the City of Seattle for decades or generations to come. Please let us know if you need the SHWA to provide you with additional information concerning the current visitors to the waterfront or concerning the operations of its members.

Sincerely,

GRAHAM & DUNN PC

A handwritten signature in black ink, appearing to read "Elaine L. Spencer". The signature is fluid and cursive, with the first name "Elaine" being the most prominent.

Elaine L. Spencer

cc: Seattle Historic Waterfront Association
m35410-2043835.doc



BART WALDMAN
EXECUTIVE VICE PRESIDENT
LEGAL & GOVERNMENTAL AFFAIRS
(206) 346-4154

September 25, 2013

Responsible SEPA Official
Seattle Department of Transportation
c/o Mark Mazzola, Environmental Manager
P.O. Box 34996
Seattle, WA 98124-4996

Re: Comments on Scope of the Waterfront Project EIS

Dear Responsible Official:

The Seattle Mariners appreciate the opportunity to comment on the scope of the Environmental Impact Statement (EIS) for the Alaskan Way Waterfront Project. As the managing tenant of Safeco Field, we are responsible for the day-to-day operations of the ballpark. While the Waterfront Project is not immediately adjacent to Safeco Field, the conditions created during and after the project will have significant impacts on, and consequences for, the ballpark.

We have read the scoping comments submitted by letter from the ballpark Public Facilities District, and we support their comments. To that, we add a few particulars.

Like the PFD, we are very concerned about the traffic and transportation impacts that construction of the Waterfront Project may have on access to and from the ballpark. We understand the need for traffic detours, temporary road closures and other measures necessary to fulfill the plan for the new waterfront. But fans coming to baseball games must be provided reasonable accommodation along the waterfront to get to the ferries, to access residences along the waterfront and in the West Edge, and to travel by car or transit to and from neighborhoods in Magnolia, Queen Anne and northwest Seattle. The Alaskan Way corridor will continue to be a critical route of travel for baseball fans and we urge SDOT and its project



partners to fully and carefully evaluate construction and permanent impacts of the reconfiguration of Alaskan Way as they pertain to the regional sports facilities, and to incorporate appropriate measures to ensure that the street remains a viable travel route both during construction and after the project is complete. Of particular concern is the appropriate recognition of the demands of major events.

We are very concerned about the continuing degradation of the street network in the stadium area and to the south and north, including the waterfront. Consequently we ask that any transportation studies done for the Waterfront Project incorporate the study of traffic issues into the SoDo area to ensure it captures impacts south of the AWV tunnel south portal, since this area acts as one unit with the waterfront.

Hundreds of baseball fans access Safeco Field on game days via the Washington State Ferry System's Colman dock, or visit the waterfront before or after a game. Maintaining safe pedestrian access from the ferry terminal and waterfront to/from Safeco Field, both during construction and afterwards will be vital to minimizing project impacts on pedestrians and ferry users. We ask that pedestrian access and safety be separately analyzed as part of the transportation section of the EIS, with the issues of lighting, signage, police services and pedestrian routing addressed following good CPTED design processes.

After many years of continuous construction around or near the ballpark we, along with many others, are suffering construction fatigue, and our fans are suffering that same fatigue. Much of the problem is due to cumulative impacts of multiple projects in very close proximity. It is difficult to convey adequate information to the public about accessing this area due to the daily construction changes from multiple projects – a list for any one week can be many pages long. It becomes even more difficult for the regional facilities which attract people from outside the Seattle area to explain to visitors how to access these facilities. This issue is common to other major tourist attractions such as CenturyLink Field, the Seattle Aquarium and other waterfront sites. A cumulative impacts analysis should consider the timing of all of the envisioned projects with the intent of minimizing duplication, and reducing, as much as possible, the continuous rerouting of people and vehicles.

Responsible SEPA Official
Seattle Department of Transportation
September 25, 2013
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The issue of parking must be addressed, both in the interim and for the long term. Parking along the waterfront has historically been available to fans going to sporting events. In fact, Safeco Field and CenturyLink Field were both directed in their respective Master Use Permit(s) to direct people to park in the CBD, which includes the waterfront. The loss of parking has created serious problems for everyone and must be replaced by no less than a comparable number of parking spaces not allocated to other uses. The loss has been compounded by having multiple projects that only report the loss by each project separately. Thus, a bad parking situation has been made worse, and has resulted in a serious deficit. The waterfront will be a regional attraction and like the stadiums, will require expanded parking to host families and visitors who necessarily rely on private vehicles to arrive in the area. The current deficit must be understood and the impacts corrected, both during construction and in the final project.

Again, we appreciate the opportunity to comment, and we look forward to working with City staff and the consultant team as this once-in-a-lifetime project proceeds. If you have any questions, please call our Director of Transportation Planning and Neighborhood Relations, Susan Ranf, at (206) 346-4236.

Sincerely,



Bart Waldman

cc: Kevin Callan, PFD Executive Director
Tom Backer, PFD Legal Counsel
Susan Ranf, Seattle Mariners
Melody McCutcheon, HCMP Law Offices

To: _____
Cc: _____
Subject: FW: Waterfront Seattle Scoping
Date: Wednesday, October 02, 2013 8:18:31 AM

Not sure if this got included in the other scoping comments.

David

From: Brady, Angela [mailto:Angela.Brady@seattle.gov]
Sent: Thursday, September 26, 2013 11:21 AM
To: Mazzola, Mark; David Mattern; Erin Tam (etam@enviroissues.com); McIntosh, Hannah
Subject: FW: Waterfront Seattle Scoping

These are mostly design comments, but here are SPU's scoping comments.
-A

From: Patterson, Gavin
Sent: Thursday, September 26, 2013 11:05 AM
To: Brady, Angela
Cc: SPU_AWVSRP
Subject: Waterfront Seattle Scoping

Angie,

I have never been totally clear about SPU's role in scoping for SDOT projects that we are closely involved in. As a result, I have not really paid much attention to the call for scoping comments. However, I did put these ones together this morning, knowing they were due yesterday. Can you still make use of them? There should be little that you are not already anticipating:

- Construction of the promenade improvements hold the risk of damaging or impacting SPU facilities installed during the Elliott Bay Seawall project. These include both water and sewer facilities which were designed with the intent of avoiding conflicts with Waterfront improvements. In order to continue to operate and maintain these facilities into the future, Waterfront Seattle design will need to be coordinated with SPU.
- New drainage facilities, including code-required water quality treatment for PGIS (GSI to the max extent feasible), will be required for the entire right of way. Work with SPU staff to develop the best options. If non-standard drainage facilities are required or desired for the promenade area, we need to resolve O&M responsibility.
- Do not build immovable, permanent structures on top of SPU facilities.
- SPU will be constructing a CSO control project along with the Waterfront Seattle project, with facilities located in Alaskan Way, and with control structures (underground vaults) required at both King St and Pike St.

- SPU requests that the Waterfront Seattle contract include language reflecting our CSO Consent Decree. We can provide sample language at the appropriate time. The gist of it is that any type of water quality violation, sanitary sewer overflow, etc., is very serious and the contractors would not only be responsible for cleanup, but also for any regulatory penalties imposed.

Thanks, and sorry for being late.

Gavin



THE SUQUAMISH TRIBE

PO Box 498 Suquamish, WA 98392-0498

September 25, 2013

Attn: Peter Hahn, Director; c/o Mark Mazzola, Environmental Mgr.
Seattle Dept. of Transportation
P.O. Box 34996
Seattle, WA 98124-4996

RE: Scoping Comments Waterfront Seattle – Alaskan Way/Promenade/Overlook Walk

Dear Mr. Hahn:

The proposed Waterfront Seattle project occurs within the Suquamish Tribe's ("Suquamish") Usual and Accustomed Fishing Grounds and Stations and has the potential to impact treaty-reserved fishing rights, natural resources, cultural, and archaeological resources. The Seattle nearshore and uplands areas are historically significant to the Suquamish people, and this area continues to be important to Suquamish culture today.

The City of Seattle ("City"), led by Seattle Department of Transportation, is seeking scoping comments on the proposed Waterfront Seattle – Alaskan Way/Promenade/Overlook Walkway, a project that includes the following components along and connected to the downtown Seattle Waterfront: Creation of new public spaces; a new roadway between King Street and Battery Street with provisions for multiple modes of transportation; a promenade adjacent to Elliott Bay; a new structure providing a pedestrian connection between Pike Place Market and the new promenade; replacement of two pedestrian bridges to the waterfront; and improvements to Columbia and Seneca Streets between Alaskan Way and First Avenue.

Suquamish requests that the EIS address and/or analyze the following for their potential impacts resulting from construction, long-term operation, and maintenance of the proposed actions:

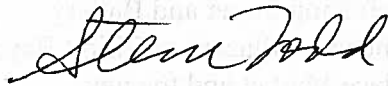
- Historic and Archaeological Resources - Suquamish is concerned of not being consulted regarding cultural resources issues for long-term planning of the waterfront. The City appears to be using the document - *A Working Plan for Art on the Central Seattle Waterfront* SDOT, Seattle Planning, and Seattle Parks and Recreation 2012 - to develop interpretive displays and themes for the long-term development of the entire waterfront. Suquamish disagrees with the adequacy of sources cited in this document, and it fails to identify important Suquamish cultural resources concerns. Suquamish notes that affected tribes were not consulted in the development of this document.
- Tribal Fishing Rights – Potential impacts from Waterfront Seattle construction and long-term operation and maintenance on treaty-reserved tribal fishing activities, and access to those activities.

- *Fish and Wildlife Species and Habitat* – Potential impacts to fish and other wildlife and their habitats
- *Stormwater and Water Quality* – Potential water quality impacts of stormwater. Please include proposed changes to stormwater treatment and outfall locations.
- *Hazardous Materials* – Potential impacts of hazardous materials from construction of Waterfront Seattle

Suquamish strongly recommends that the City include in its designs for Waterfront Seattle the following: Re-vegetation with native plants along Alaskan Way that would enhance both the terrestrial and nearshore ecological conditions; enhancement of stormwater collection and treatment through low impact development (LID) technology; and removal of existing hazardous materials along the waterfront. Finally, Suquamish recommends that the City consider how design and construction of new infrastructure for Waterfront Seattle may affect or preclude future shoreline restoration actions.

Suquamish appreciates the opportunity to provide scoping comments on the Waterfront Seattle project. Please contact me for Environmental/Fisheries issues, and Dennis Lewarch, the Suquamish Tribal Historic Preservation Officer, for Historic and Archaeological Resource issues.

Sincerely,



Steve Todd
Ecologist



Washington State Department of Transportation

Lynn Peterson
Secretary of Transportation

September 25, 2013

Mr. Peter E. Hahn, Director
Seattle Department of Transportation
c/o Mark Mazzola, Environmental Manager
PO Box 34996
Seattle, WA 98124-4996

SUBJECT: WSDOT Comments on Waterfront Seattle - Alaskan Way/Pedestrian Promenade/Overlook Walk

Dear Peter,

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to provide scoping comments to the City on your EIS process for Waterfront Seattle. In particular, WSDOT looks forward to the coordination that will occur between the Waterfront Seattle Project and the Alaskan Way Viaduct Replacement Program and the WSDOT Ferries Division's (WSF) Seattle Multimodal Terminal Project.

WSDOT's specific comments are provided below.

WSDOT Property

The City shows use of two WSDOT-owned parcels, 1) Pier 48, and 2) a portion of the Integrus parcel at Pike Street. Coordination between the City and WSDOT will be needed to further discuss the proposed use of those properties. City acquisition of these properties has not been discussed with WSDOT and further discussion will need to take place.

Construction Traffic Management

WSDOT looks forward to coordination with the City in regards to construction traffic management while both WSDOT and City projects are under construction along the waterfront area.

Waterfront Streetcar

WSDOT understands that a streetcar running along the waterfront is still being studied by the City. WSDOT has primary concerns about this proposal: 1) a streetcar would reduce the capacity of the street, due to in lane stops and signal timing changes and, 2) a late decision to include a streetcar would cause a major change to the design of the street and

would incur delays and increases in design costs. WSDOT believes this design is incompatible and needs to be further discussed.

Elliott Way Design

The current design for Elliott Way does not appear to work well for freight traffic, with an in street bike lane northbound up a nearly 7% grade and a sharrow southbound. This design increases the likelihood of truck and bicycle conflicts. WSDOT recommends studying a design that places all pedestrian and bicycle traffic on the east side of the street, with positive separation from vehicular traffic. WSDOT does not believe a sidewalk is needed on the west side of the street.

Street Reconstruction

WSDOT does not believe reconstruction of the following streets is necessary: Elliott Avenue north of Blanchard, Bell Street between Elliott and Western, Western Avenue between Lenora and Blanchard, and Lenora Street from Elliott Way to Western Avenue. Any street reconstructions that are included within the scope of the project should be performed to reconnect Alaskan Way to Elliott/Western.

Alaskan Way Roadway Design and Operations

The Pine Street intersection must be designed to accommodate all vehicles, including large freight trucks.

The proposed design includes two ferry queuing lanes between Yesler Way and Washington Street. WSF supports this element of the roadway design because the two-block length of the ferry queuing lanes will benefit all users, significantly reducing the potential for traffic headed to Colman Dock to congest the through general purpose and transit/right-turn lanes during peak ferry use times. This queuing space will also enable shorter signal timing, ultimately meaning shorter wait times for pedestrians crossing Alaskan Way.

WSF believes an intelligent traffic signal operations system needs to be implemented at the Marion Street/Alaskan Way, Marion Street/Western Avenue, and Marion Street/First Avenue signals and integrated with Seattle Ferry Terminal operations. Lack of signal synchronization would lead to delays that would be mitigated by increased vessel crossing speed, thereby increasing fuel consumption. Adaptive signalization will improve the efficiency of traffic exiting the terminal and allow ferry vessels to remain on schedule. WSF would like to work with SDOT to evaluate system options with a goal of increasing overall efficiency. As part of the discussion, WSF would assess options that would allow WSF to provide real-time ferry loading and schedule information to these adaptive signal systems in order to implement a ferry-transit signal priority.

In addition, WSF requests that SDOT consider providing a through movement for traffic exiting Colman Dock at Yesler Way. This would provide another option for travelers headed north after leaving the ferry terminal.

Colman Dock Transit Hub

Colman Dock is a key regional transit hub providing a critical transportation link across the Puget Sound. In 2012, 8.4 million riders, including 4.3 million foot passengers, used the facility. As one of three Center City Multimodal Hubs, Colman Dock has been identified as a key element of the City's transportation system intended to function as both a destination and transfer point for a variety of transportation users. As such, WSF's priority is to ensure that SDOT's future design of the roadway, signals, cycle track and pedestrian promenade in front of Colman Dock provides safe and efficient access to and from the facility for all customers.

Following several months of correspondence regarding specific curb-zone requirements to accomplish this goal, WSF remains concerned with the current design in front of Colman Dock. WSF requests SDOT evaluate a one-way load/unload zone adjacent to the entrance of the ferry terminal, between Marion Street and Columbia Street. This feature is typical of other multimodal transit hubs, and would accommodate ADA pick-up/drop-off, taxis, buses, and other short-duration loading and unloading.

With expected increases in pedestrian volumes, and a much wider promenade, the potential for vehicle-pedestrian conflicts will likely increase. WSF and SDOT should work together to identify options to reduce conflicts to keep people safe, while preserving efficient operations at Colman Dock and the look-and-feel of the promenade. One concept that should be evaluated would be the use of landscaping and/or other design treatments to channel pedestrians at intersections where the promenade crosses ferry terminal access/egress points. Additionally, the City shall maintain the existing curb cut for southbound bicycles to access the ferry toll plaza and automated bicycle entrance. This dedicated entrance is a safety improvement that provides separation between the bicycles and vehicles accessing the toll plaza.

Specifically related to ADA accommodations, improved accessibility for people with disabilities is one component of the Seattle Ferry Terminal at Colman Dock project currently under design. WSF would like to see the City's proposed design be supportive of these improved accommodations. Safe and convenient access to Colman Dock for those with disabilities should be a key consideration of the design.

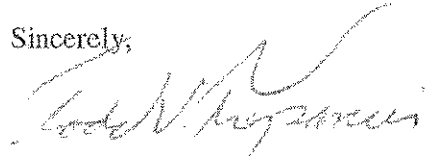
WSDOT looks forward to further, close collaboration with SDOT as design is advanced.

For comments related to WSDOT Property, Waterfront Streetcar, Elliott Way Design, and Street Reconstruction, please contact Alec Williamson at 206-805-5442 or williar@wsdot.wa.gov. For comments on Construction Traffic Management, please contact Rob Brown at 206-805-5416 or brownr@wsdot.wa.gov. For comments on the Alaskan Way roadway design and Colman Dock transit hub, please contact Genevieve Rucki at 206-515-3461 or RuckiG@wsdot.wa.gov.

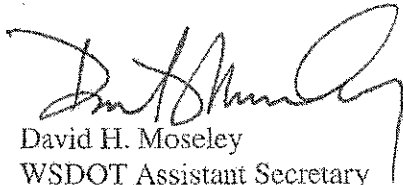
Waterfront Seattle – WSDOT scoping comments
September 25, 2013

Thank you for the opportunity to provide scoping comments, and as noted above,
WSDOT looks forward to continuing coordination on the Waterfront Seattle Project.

Sincerely,



Todd V. Trepanier, P.E.
Administrator
Alaskan Way Viaduct Replacement Program



David H. Moseley
WSDOT Assistant Secretary
Ferries Division

cc: Nicole McIntosh, WSF
Genevieve Rucki, WSF
Allison Hanson, WSDOT Environmental



**WASHINGTON STATE
MAJOR LEAGUE BASEBALL STADIUM
PUBLIC FACILITIES DISTRICT**

110 Edgar Martinez Drive South
P.O. Box 94445
Seattle, WA 98124
(206) 664-3076

www.ballpark.org

SEPA Responsible Official
Peter E. Hahn, Director
Seattle Department of Transportation
c/o Mark Mazzola, Environmental Manager
P.O. Box 34996
Seattle, WA 98124-4996

Re: Comments on Scope of the Waterfront Project EIS

Dear Mr. Hahn:

The Washington State Major League Baseball Stadium Public Facilities District (PFD) appreciates the opportunity to comment on the scope of the Environmental Impact Statement (EIS) for the Waterfront Seattle—Alaskan Way / Promenade / Overlook Walk project (Waterfront Project). As you may know, 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's investment in the ballpark is not compromised.

While we recognize that the work areas for the Waterfront Project are not located immediately adjacent to Safeco Field, we remain concerned about potential impacts from the project on our facilities, our fans, and our tenant, the Seattle Mariners. Accordingly, we would like to make the following comments about the scope of the environmental review:

First, the City should broaden the list of environmental resources to be evaluated in the EIS. While the scoping notice identifies some key elements of the environment for review, the EIS should also examine potential impacts of the Waterfront Project on other elements of the natural and built environment, including earth, air, energy and natural resources, and recreational resources (such as Safeco Field and CenturyLink Field and Event Center). Without appropriate environmental review, careful project design, and appropriate mitigation measures, the Waterfront Project could have significant adverse impacts on our facilities and the public. We support an EIS that evaluates the full range of environmental resources and develops appropriate mitigation measures to reduce project impacts.

Second, the PFD is very concerned about the traffic and transportation impacts that construction of the Waterfront Project may have on access to and from the ballpark. We understand that some traffic lane or roadway closures may be required as part of the project, including some closures for extended periods. These closures would require traffic detours and lane re-routing that could affect traffic and

BOARD OF DIRECTORS

Charley Royer, Chair
Bob Wallace, Vice-Chair
Terrence A. Carroll
Joan Enticknap
Charles V. "Tom" Gibbs
Hyeok Kim
Dale R. Sperling

transit access to and from Safeco Field. Because construction of this project will take many years to complete, and because construction impacts may be significant if not appropriately mitigated, we urge SDOT and its project partners to evaluate carefully construction impacts and appropriate mitigation measures (including route alternatives) in a separate section of the EIS.

Similarly, traffic circulation, vehicle access, and pedestrian access are vital to the continued operation and success of Safeco Field. We understand from the public scoping meeting and agency handouts that the EIS will examine the substantial changes to the existing transportation network that will be caused by the Waterfront Project, including impacts on all transportation modes. We ask that this analysis include an evaluation of “event traffic” conditions to ensure that “worst case” traffic impacts are evaluated in the EIS.

Third, the PFD is concerned about pedestrian and fan safety and the impact of the Waterfront Project on pedestrian access to and from the ballpark. Hundreds of baseball fans access Safeco Field on game days via the Washington State Ferry System’s Colman Dock. Maintaining safe pedestrian access from the ferry terminal to Safeco Field through the Waterfront construction work area will be vital to minimizing project impacts. We ask that pedestrian access and safety be separately analyzed as part of the transportation section of the EIS.

Fourth, we are concerned about the cumulative impacts resulting from the construction of this and many other public and private projects at the same time in the Central Waterfront and South Downtown areas. We urge you to include a well-developed discussion of cumulative impacts in the EIS. Public projects likely to occur at the same time include the Alaskan Way Viaduct Replacement Project (including South End, Central Waterfront, and North Portal improvements), the proposed SODO arena, and other SDOT and WSDOT projects in the vicinity. Private projects may include the continued redevelopment of the North Lot of Qwest Field (east half) and a host of other projects in the Pioneer Square, International District, and SODO areas.

A cumulative impacts analysis should thoughtfully consider the timing of all of these projects and the opportunity for imposing some common mitigation measures that reduce otherwise potentially significant impacts (e.g., from construction truck/haul traffic). Absent careful analysis and appropriate mitigation, these cumulative impacts could be significant.

Fifth, we understand that the Waterfront Project will include new local transit service along the waterfront. We encourage the City to include in the EIS a full evaluation of a range of alternatives for providing such service, including returning the historic George Benson trolleys along a waterfront line. Recent reports indicate promising news regarding the cost of retrofitting the vintage trolleys (one-third less expensive than purchasing new cars), as well as possible locations for their maintenance and storage. At the same time, we understand that the Port of Seattle has expressed concerns about freight movement along the waterfront and the impact of any fixed-rail transit alternatives. We would expect that these issues could be fully addressed in the EIS for all of the local transit services being considered, including trolleys.

This evaluation of new local transit service should include a careful assessment of the number of transit vehicles per hour that would be required to provide equivalent transit capacity, and it should assess the impacts resulting from the different transit options being evaluated (historic streetcar, retrofitted streetcar, modern streetcar, battery powered mini-bus, or battery powered full-size coach). For example, the historic Benson trolleys have a seated capacity of 43 passengers. If the trolleys are operated with 15-minute headways (4 trips/hour), the hourly seated capacity would be 172 passengers/hour. In contrast, the proposed battery-powered mini-buses have a seated capacity of 12.

To achieve the same seated transit capacity as the Benson trolleys would require running more than 14 mini-bus trips/hour. This requires a larger fleet of vehicles and operators to provide a comparable level of transit capacity. In addition to higher capital and O&M costs, this also results in more vehicles/hour, which may have an impact on freight and other traffic operations. The EIS should perform this (or a similar analysis) to ensure that the local waterfront transit options and their impacts can be appropriately compared and evaluated.

This EIS should also consider evaluating options for connecting this local waterfront transit service to the proposed City Center Connector (CCC) service and the First Hill streetcar line. The preferred alternative for the CCC service now appears to be a First Avenue alignment, which could accommodate both the retrofitted Benson trolleys or modern streetcars. If a connection between these lines proves viable, this expanded route could provide a much-enhanced experience for Seattle visitors by connecting the Waterfront, First Avenue, Pioneer Square, Pike Place Market, and South Lake Union/MOHAI with a single-seat ride. It could also offer a connection to the First Hill streetcar line and all of its destinations. If the Benson trolleys are used for this transit service, they would provide an historic tie between the waterfront and these other places of historic significance in the city. The Waterfront EIS should explore these connection options and evaluate their impacts.

Finally, we would like to renew our commitment to work with SDOT and its project partners regarding mitigation planning for implementing this major project. As a spectator sports facility and pedestrian venue, the continued success of Safeco Field turns in large part on our baseball fans' and patrons' ability to access our facility. We understand that facility access may be affected during Waterfront Project construction, but we believe that if we work together on mitigation planning, the impacts of construction can be reduced. We look forward to seeing a detailed analysis of potential mitigation measures in the draft EIS, and we will provide comments and suggestions to you throughout the environmental review process.

We also note that our tenant, the Seattle Mariners, has submitted a separate comment letter. The PFD joins in the concerns and issues raised by the team.

Again, we appreciate the opportunity to comment, and we look forward to working with the City of Seattle and the consultant team as this important project proceeds. If you have any questions, please give our Executive Director, Kevin Callan, a call at (206) 664-3076 or (206) 767-7800.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles V. Gibbs", is written over a horizontal line.

Charles V. "Tom" Gibbs
Committee Chair, Maintenance and Operations

cc: PFD Board members
Kevin Callan, Executive Director
Tom Backer, Legal Counsel
Bart Waldman, Seattle Mariners
Susan Ranf, Seattle Mariners
Melody McCutcheon, HCMP Law Offices



September 24, 2013

Mr. Peter E. Hahn, Director
Seattle Department of Transportation
c/o Mark Mazzola, Environmental Manager
PO Box 34996, Seattle, WA 98124-4996

Email: UplandEISscoping@waterfrontseattle.org

Re: Comments on Scope of EIS for the Waterfront Seattle from Washington State
Public Stadium Authority

Dear Director Hahn:

The Washington State Public Stadium Authority (PSA) appreciates this opportunity to comment on the scope of environmental review for the proposed Waterfront Seattle (Alaskan Way/Promenade/Overlook Walk) EIS. The PSA is the public agency that owns CenturyLink Field and Event Center (CenturyLink). PSA is charged with being the steward for and protecting the public's \$300 million, statewide investment in these facilities.

The PSA supports the City's efforts to revitalize the waterfront and create the new Waterfront Seattle project. CenturyLink is located at the southern terminus of the proposed Waterfront Seattle project.

Together with the Washington State Major League Baseball Stadium Public Facilities District, which owns Safeco Field, the PSA adopted a Stadium District Concept Plan earlier this year. That Concept Plan, which includes the Stadium Transition Overlay and immediately adjacent areas to the north owned by the PSA, envisions increased open space, enhanced pedestrian and bicycle connections to transit and to the Waterfront, and the creation of a vibrant community in the Stadium District. Of particular relevance to the Waterfront Seattle project, the Concept Plan identifies Railroad Way as an important connection to the Waterfront and outlines a concept for the redevelopment of this corridor (see Concept Plan, pp. 55-60).

In addition, the City and various stakeholders in the Stadium Transition Overlay area, including the PSA, are in the midst of a planning effort to address the future development of the Stadium District Area.

As part of preparing the EIS for the Waterfront Seattle project, the PSA requests that the City consider and evaluate the effect of these planning efforts on the Waterfront Seattle project, and vice versa. In particular, the PSA requests that the City evaluate the interrelationship between

Mr. Peter E. Hahn
September 24, 2013
Page Two

the Concept Plan and the City's plan for Railroad Way that is part of the Waterfront Seattle project, and evaluate ways to implement the vision from the Concept Plan into the final Waterfront Seattle design.

Further, the proposed EIS should evaluate the transportation impacts associated with development of the Waterfront Seattle project in light of the other development ongoing in the area, including the proposed new Arena at the south end of the Stadium District.

Thank you in advance for your consideration.

Very Truly Yours,

WASHINGTON STATE PUBLIC
STADIUM AUTHORITY

A handwritten signature in black ink, reading "Ann Kawasaki Romero". The signature is written in a cursive, flowing style.

Ann Kawasaki Romero
Executive Director



September 26, 2013

Peter Hahn, Director
City of Seattle Department of Transportation
700 Fifth Avenue
Seattle, WA 98124-4996

RE: Scoping Comments for the Seattle Waterfront Environmental Impact Statement (EIS)

Dear Mr. Hahn,

On behalf of the Washington Trust for Historic Preservation, please accept these comments related to the EIS scoping process for the Seattle Waterfront project along Alaskan Way. The Washington Trust is a nonprofit advocacy organization that works to preserve and safeguard the historic and cultural resources of Washington.

A variety of historic resources, including two of Seattle's most prominent historic districts, lie within the location of the proposed work and are likely to be adversely affected. Of paramount concern is the impact increased traffic lanes and revised traffic alignments will have on both Pioneer Square and Pike Place Market. Historically, Pioneer Square has been directly connected to the waterfront – a portion of the historic district runs along Alaskan Way. This connection must be carefully considered as transportation needs are assessed and designs proceed.

In addition, the Washington Trust urges the design process for the redevelopment of Alaskan Way to be sensitive to existing historic resources being affected by other projects, namely the Seawall Replacement project. Historic seawall railings are by necessity being removed as part of the replacement. But their re-installation, of either salvaged historic railings or newly manufactured replica railings, appear to be subject to design preferences associated with the Alaskan Way project. Retention of elements currently associated with historic districts and other resources currently listed in or eligible for listing in national, state or local historic registers should be a priority.

Finally, the Washington Trust looks forward to participating in the Section 106 and 4(f) review process, to the degree that each process applies to this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Moore'.

Chris Moore
Field Director

Katheryn Seckel

From: Upland EIS Scoping <uplandeisscoping@waterfrontseattle.org>
Sent: Thursday, September 26, 2013 3:09 PM
To: Katheryn Seckel
Subject: Fwd: Waterfront EIS Scoping Comments by UNITE HERE Local 8
Attachments: UNITE HERE LOCAL 8 Waterfront EIS Scoping Comments.pdf

----- Forwarded message -----

From: **Stefan Moritz** <stefan@unitehere8.org>
Date: Wed, Sep 25, 2013 at 4:34 PM
Subject: Waterfront EIS Scoping Comments by UNITE HERE Local 8
To: UplandEISscoping@waterfrontseattle.org

Waterfront EIS Scoping Comments by UNITE HERE

Dear Director Hahn,

Thank you for the opportunity to offer comments as part of the EIS scoping process for the Seattle Waterfront. UNITE HERE Local 8 represents hospitality workers in Seattle, including in downtown hotels, stadiums, convention centers, and restaurants. It is our mission to improve the lives of workers and their communities through organizing, coalition building, and policy advocacy.

The redevelopment of our waterfront will spur significant growth in tourism and hospitality-related industries. But unchecked growth of the hospitality industry will likely have serious adverse impacts on the environment, particularly through impacts on traffic and housing. We urge you to carefully consider these impacts.

Impacts on Traffic

Hotels and convention facilities have a distinctly different land use impact than other uses expected on the waterfront. For example, hotels generate more midday and evening traffic than many other uses, resulting in more daily traffic overall. Office and residential uses would create sharp, but predictable, peaks every weekday in the morning and afternoon due to commuting. Hotel/convention projects would typically generate smaller peaks for some combinations of events but higher peaks for larger events. These increased daily traffic volumes, as well as different hourly traffic patterns throughout the day, should be carefully considered in the Waterfront EIS.

Impacts on Housing

Hotel developments have disproportionately larger impacts on housing demand and housing affordability than any other land use. According to a recent study, hotel workers in Seattle earn a median annual wage of \$22,960^[1], which would be equivalent to 38% of area median income (AMI) for a household with a sole earner.^[2] Many hospitality workers can be considered part of the working poor in our region.

Using recent data from the Washington Employment Security Department^[3] and the American Community Survey^[4] it can be reasonably estimated that about 80% of permanent hotel jobs created will be low wage, with workers earning 50% or less of median income.^[5] The proportion of low-wage workers is consistent with the 2000 nexus study commissioned by the City of Seattle for the commercial density bonus program. That study shows that 88% of all hotel jobs are non-supervisory service, support, administrative or clerical.^[6]

A recent study prepared for the City of Seattle by Community Attributes found that Seattle averages 1.33 workers in the labor force per household. Using a similar method to that study, we estimate that, that out of every 1,000 new hotel jobs created, 800 will be lower-wage jobs. This will result in 640 new households in the region (out of 750 total units) that will need to be affordable at 80% AMI or less. If we further assume that half of the workers filling the new jobs are sole breadwinners, then at least 320 will need units affordable at 50% AMI. The other 320 will still need affordable units, ranging from 50% AMI to 80%.^[7]

At a minimum, 43% of the households created will need units affordable at 50% or below. The comparable figure for all of the downtown workforce is 11%.^[8] **Hotels create roughly four times the demand for 50% AMI units than overall downtown jobs.**

Estimated Affordable Housing Demand - Hotels	
Jobs created	1,000
Demand for housing units (all income levels)	750
Workers earning 50% AMI or less	800
New households at 80% AMI or less	640
New households at 50% AMI or less	320 (43% of units)
New households at 50% to 80% AMI	320 (43%)
Total demand created for new affordable units	640 (85%)

These impacts on housing and public services are significant when considering the low wage jobs that hospitality growth will generate. We urge you to consider these impacts carefully as well.

Summary

The redevelopment of the Seattle Waterfront is a tremendous opportunity to not only rebuild the waterfront, but also to improve the lives of many members of our community by working towards environmental sustainability. This opportunity can only be fully realized through careful study and mitigation of the adverse impacts on traffic and housing that hospitality development will generate.

Thank you for your consideration of these comments.

Sincerely,

Stefan Moritz

UNITEHERE**! Local 8**

2800 First Avenue Ste. 3, Seattle, WA 98121

Office Phone: [\(206\) 470-2992](tel:(206)470-2992)

Cell Phone: [\(206\) 963-3166](tel:(206)963-3166)

Fax: [\(206\) 728-9772](tel:(206)728-9772)

Stefan@unitehere8.org

[1] Our Pain, Their Gain, The Hidden Costs of Profitability in Seattle Hotels, Puget Sound Sage, April 2012, p. 18

[2] Seattle Office of Housing, Income and Rent Limits, Multifamily Rental Program, 2010 limits.
http://www.seattle.gov/housing/development/limits_Multifamily.htm

[3] <https://fortress.wa.gov/esd/employmentdata/docs/occupational-reports/occupations-industry-matrices.xls>

[4] Analysis of American Community Survey data prepared for Unite Here by Puget Sound Sage

[5] 50% Median income for an individual was \$30,000 in 2010 and \$30,350 in 2013. See http://www.seattle.gov/housing/development/docs/2010_Income_and_Rents_MF_Rental.xls) and (http://www.seattle.gov/housing/development/docs/2013_Income_and_Rents_MF_Rental.pdf)

[6] Keyser Marston Associates, *Jobs Housing Nexus Analysis: Office and Hotel Buildings Downtown Seattle Linkage Program*, May 9, 2000.

[7] In line with the Community Attributes study, we assume other earners in a household will earn about the same as the hotel workers.

[8] *Community Attributes*