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July 19, 2010

Elliott Bay Seawall Scoping Comments
c/o Tetra Tech, Inc.
1420 Fifth Ave, Suite 550
Seattle, WA 98101

RE: Alaskan Way Seawall EIS Scoping Comments from Port of Seattle

To the NEPA/SEPA Responsible Official:

Thank you for the opportunity to review and comment on the scope of the Alaskan Way Seawall EIS. We recognize the importance of this project to Port business and operations. We take this opportunity to summarize our Port ownership and operations near the seawall, to discuss related infrastructure that those facilities rely on, and to respond directly to items in your request for comments.

I. Potentially affected Port facilities include container and cruise terminals in the Elliott Bay and our property and bulkhead ownership along the seawall. These properties represent a variety of land uses and vary in their access needs. The uses include public access points, Port headquarters and operations, and the time-critical operations of our facility tenants.
II. Port facilities rely on surrounding infrastructure which, in turn, depend on the seawall's structural support, including: the transportation functionality of Alaskan Way, the mainline rail trackage, and infrastructure in the street right-of-way.
III. Finally, we comment on the project phasing and the impact of project alternatives on various elements of the environment.

I. Port facilities, ownership/operations and tenant operations

Container terminals: While our container terminals lie to the south and west of the seawall, the seawall plays a vital role in keeping the transportation arteries flowing to minimize transportation congestion in the North Duwamish area. Port facilities on Elliott Bay function as an international trade gateway, contributing to our local, regional and national economy. Container trade through the Port peaked at 2.1 million 20-foot equivalent units (TEUs) in 2005 and has averaged approximately 1.7 million TEUs per year since then. It should be noted that recent trends show recovery of container volumes and point to long-term container growth. Maintaining the capacity of traffic operations in the Alaskan Way corridor is essential to the smooth and efficient flow of imports and exports between ship and land.

Cruise terminals: The Seattle cruise ship business has experienced substantial growth since homeporting began in the last decade. The Port of Seattle's cruise ship terminals have hosted at least 200 ships per year since 2008; this year, we expect about 225 cruise visits with about 858,000 passengers. The cruise ship

terminal at Pier 66 sits between two sections of the seawall under study. The second cruise terminal is located at Terminal 91 (T-91), at the north end of Elliott Bay. Though not directly dependent on the seawall, the T-91 cruise terminal relies heavily on the ability of airport charter buses to access the terminal via Alaskan Way.

Pier 66 and Pier 69/Other uses: Our Bell Street Pier complex at Pier 66, which has been growing since the mid-1990s, depends on the seawall for access and infrastructure. Similarly, the seawall supports access and infrastructure at Port Headquarters at Pier 69 for Port employees and visitors. Pier 69 also shares space with the Victoria Clipper ferry, which provides services to approximately 250,000 passengers annually, and the Arctic Storm Management Group.

Other terminals: The Port's Grain Terminal at Terminal 86 (T-86), though not directly dependent on the seawall itself, depends heavily on the ability of cargo shipments to move efficiently through the Alaskan Way corridor. Both the Burlington Northern Santa Fe (BNSF) and Union Pacific railroads access this terminal, which has a capacity of 3.99 million bushels of grain. Disruptions to the movement of freight through this corridor could significantly impact operations at the T-86 Grain Terminal, which serves as a critical site for trade in our region.

POS properties and bulkheads along the seawall: Our properties adjacent to the seawall are varied in their use and have distinct access issues:

LOCATION	LAND USE/ACCESS
Pier 69 Includes 550-575 ft of City seawall construction 1. Port Headquarters 2. Victoria Clipper passenger terminal 3. Arctic Storm Management Group 4. Public access along pier apron	1. Port employees/visitors generally park in the World Trade Center Parking Garage, 2 blocks south. 2. Many Victoria Clipper passengers also park remotely; significant numbers of commercial & private vehicles queue on Alaskan Way in front of P-69 for pick-up/drop-off. 3. Water-dependent tenant, reserves the right to moor a boat here. 4. Waterside access is available to the public at P-69
Pier 66, Bell Street Pier Complex Includes 800-825 ft of City seawall construction at Marina and north apron; the bulkhead on which P-66 itself sits pre-dates the City's seawall. 1. Cruise ship terminal 2. Conference center, restaurant complex & viewpoint, marina, grocery/deli 3. Public plazas: rooftop & fountain 4. World Trade Center & parking facility on east side of Alaskan Way 5. Bulkhead	1. We will provide detailed information on cruise terminal operations at your request. Those needing access needs include charter buses, commercial & private autos, & provisioning trucks during the half-day Port call for 2000-3000-passenger ships. 2. Most visitors park in the WTC garage & cross over Alaskan Way on the Bell St. pedestrian overpass. 3. Public recreation opportunities (including marina) 4. World Trade Center includes offices & restaurant. 5. The City Seawall breaks at Pier 66, which sits atop a bulkhead built around 1915, and strengthened in the 1990s w/ construction of Bell St. Pier.

North Elliott Bay Terminals	
1. T-91 Cruise ship terminal 2. T-86 Grain Terminal	1. Airport charter buses access the T-91 cruise terminal via Alaskan Way. Charter buses to T-91 prefer the Alaskan Way route to Airport. 2. Grain exports access T-86 via the rail lines paralleling Alaskan Way along the North Seawall.

II. Related Infrastructure:

The seawall is integral to the functioning of Alaskan Way as a corridor for transportation and utilities and for supporting the BNSF Railway's mainline.

Alaskan Way surface: The existing surface Alaskan Way plays an integral role for access to waterfront properties, transit, freight delivery and over-legal trucks, tourist activities, bicycle route, ferries (both state and private), and cruise ship access. Specifically, our properties above rely on Alaskan Way surface street for their access, be it passenger vehicles, freight deliveries, or pedestrians/bicycles. It is important to note that Alaskan Way is designated as the over-legal route through downtown. Alaskan Way also provides public transit: in the recent past, the Waterfront Streetcar has run along this roadway, and we currently utilize Metro Transit Route 99.

Utilities: We are concerned that a failure of the seawall could cause loss of power, steam, data and communications, water, and sewer operations to our facilities.

Rail: The mainline BNSF railroad tracks for the West Coast run parallel to the seawall from the Seattle tunnel's North Portal near Stewart Street to Bay Street. Seattle and Tacoma container cargo shipments rely on intermodal transfers to rail lines for about 65-70% of the imports and 50% of the exports and the BNSF Railway carries more than half of these containers to the north on this mainline. In addition, the Pier 86 Grain Terminal (located to the north near Galer Street) depends on these tracks for access from the mainline. Passenger trains also operate daily on this track.

III. Comments on Project Phasing, Project Alternatives, and Elements of the Environment

Project Phasing: Located on the north end of the Central Waterfront, the Port of Seattle is very interested in the project phasing for the northern half of the seawall. We ask that the document explain the relative risk and reasoned decision making for project phasing regarding this northern half. Additionally, please explain how the seawall replacement schedule will fit with the schedule for the Alaskan Way Viaduct replacement project.

Project Alternatives: At the public scoping meeting held on June 16, 2010, SDOT and the Army Corps of Engineers presented two general options for seawall replacement construction: ground improvement and drilled shafts. The EIS should carefully evaluate alternative construction methods that will impact elements of the surrounding environment as listed below.

Elements of the environment: Given the Port land uses and operations described above, we ask that you address the following impacts in your analysis.

- Impacts to recreational properties: Please address how plans to stabilize the shoreline south of the bulkhead at Pier 66 may affect conditions at the Bell Harbor marina and access to the north apron area of the pier. Similarly, please provide information about how shallow water habitat restoration would affect these recreational areas. Please also address impacts on public access at Pier 69 and the Bell Street Pier.
- Impacts to marine habitat: In developing Pier 66 in the 1990s, the Port carried out substantial clean-up work along the waterfront. There is a four-acre sediment cap and a very healthy habitat mitigation site within the marina (lying west of the city's seawall). Please address the potential for disruptions to this habitat.
- Impacts associated with no action: Please address impacts to Port and tenant assets and operations in case of catastrophic seawall failure impacting the corridor and adjacent infrastructure.
- Impacts to transportation corridors: This is a significant concern, as Alaskan Way provides access and through trips for multiple transportation modes. Please identify the proposed construction process and mitigation measures and discuss resultant impacts, including possible disruptions to service.
- Geotechnical impacts: Please address the potential that soil strengthening improvements along Alaskan Way may have a destabilizing impact on adjacent soil structure performance, such as on our bulkhead at Pier 66.
- Impacts to businesses and residences from noise and air quality: Please address air quality and noise impacts to Port operations and tenants as described above.
- Socio-economic impacts associated with large, multi-year construction project: Please address impacts on Port operations and tenants.

Efficient access and infrastructure for Port properties is vital to our economy. We look forward to working with the Corps and the City on this study to provide necessary data or contacts within the Port and develop a workable solution for the risk of seawall failure. Thank you for your efforts.

Sincerely,

Geraldine Poor
Regional Transportation Manager
206-787-3778

cc: City – Stephanie Brown
POS – Akiyama, Blomberg, McKenna