



July 19, 2010

Mr. Patrick Cagney
U.S. Army Corps of Engineers, Seattle District
P O Box 3755
Seattle, WA 98124-3755

**RE: EIS Scoping
Elliott Bay Seawall**

Dear Mr. Cagney:

Thank you for the opportunity to comment on the scoping for the Elliott Bay Seawall project in Seattle. Puget Sound Energy (PSE) owns and operates natural gas facilities within the project area and will be a key stakeholder in the utility coordination process.

The construction of the Seawall Project and associated waterfront improvements could significantly affect PSE's natural gas system. Insufficient details are available at this time to determine the scope of these impacts; however PSE, along with other utility purveyors, will be required to adjust any portion of the natural gas system that presents an unavoidable conflict with the Seawall Project.

Complete removal and/or relocation of PSE facilities – especially waterfront services - within the project area may be necessary in order to accommodate the planned construction activities. The Seawall Project construction plan must include a workable plan for ensuring continued provision of utility service to waterfront customers. Of particular concern are the multiple simultaneous projects being managed by different agencies. The relocation of utilities should be closely coordinated so that each utility adjustment does not conflict with another utility's relocation plans **for all overlapping projects**. For these reasons, PSE requests that natural gas impacts and relocations be specifically identified in the utilities section of the EIS.

PSE facilities within the potential project impact area include:

- 12-inch high pressure supply line (the only north-south high pressure feed through Seattle);
- Numerous intermediate pressure lines that provide feed for local services;
- District regulators that steps down pressure from the high pressure system into the intermediate and low pressure systems.

The future location of PSE's relocation facilities cannot be determined until survey-level detail of the project area is provided. In general, to accommodate the future placement of both the high pressure pipeline and a single intermediate pressure line, PSE will require an exclusive seven foot corridor (the final configuration will be determined during design.)

Other areas of concern that should be addressed in the EIS include:

- Corrosion control measures for the new sea wall, including coatings and cathodic protection requirements. Stray current interference between CP systems on the sea wall and natural gas facilities must be identified and mitigated through engineering design.
- Identification of new permanent locations for two District Regulators currently located at Spring Street east of Alaskan Way, and Pike Street on Alaskan Way.
- Special focus on the coordination of any relocated natural gas and Seattle Steam facilities due to separation standards.

Please include Puget Sound Energy as a party of record for this project. All future correspondence and project notices related to environmental review and permitting should be sent to:

Elaine Babby
Puget Sound Energy
Senior Land Planner
P O Box 97034, EST11W
Bellevue, WA 98009-9734

If you have any questions you can contact me at elaine.babby@pse.com or (425) 462-3805. We look forward to cooperatively working with your team on this important project.

Sincerely,



Elaine Babby
Sr. Land Planner, Puget Sound Energy

Cc: Julie Kelly, PSE Project Manager
David Namura, PSE Community Relations Manager

