July 19, 2010

Stephanie Brown, Seattle Department of Transportation
Pat Cagney, U.S. Army Corps of Engineers
Elliott Bay Seawall Scoping Comments
c/o Tetra Tech, Inc.
1420 Fifth Ave, Suite 550
Seattle, WA 98101
Via email: seawall@seattle.gov

RE: Elliott Bay Seawall Project Scoping Comments

Dear Stephanie and Pat:

We are writing to provide scoping comments on the *Elliott Bay Seawall Project* for the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA) processes – the draft Environmental Investigation Study (DEIS).

People For Puget Sound is a non-profit membership organization working to restore the health of Puget Sound.

People For Puget Sound supports moving forward on the Seattle Central Waterfront seawall/water's edge replacement quickly because of the potential for failure. We support environmentally-friendly new water's edge.

Our specific comments follow:

- **Range of options for each location.** We would like to see a range of options presented for each portion of the seawall (linear extent) so that the waterfront design team - currently being solicited through an RFQ process - will have a choice of ideas for each area of the waterfront.

- **Innovative techniques**. We also support the inclusion of innovative "push the envelope" solutions without consideration of financial or other politically-oriented barriers. We have found that techniques considered infeasible in one year can become feasible within a year or two because of advances in technology.

- **Ecological goals**. People For Puget Sound has three goals for the Central Waterfront:

    - **A continuous fish migration corridor**. Up to 20 million juvenile salmon leave the Duwamish River annually and an unknown percentage of them turn right and migrate along the Seattle Central Waterfront. We believe that their pathway should be unimpeded in the new waterfront by using a variety of techniques. For example, piers can be pushed out (when they are redeveloped, over time), natural, passive lighting techniques can be used to eliminate shadows from the overwater gangplanks and piers, beaches can be installed, soft and tiered edges can be incorporated along the water's edge, etc.

    - **30% habitat**. To match the diminishment of the Green/Duwamish system to about 30% of its original flow and habitat function, we need to bring <u>up</u> the amount of linear habitat along the nearshore of Elliott Bay to 30% within each reach – that is, bring up the amount in the Central waterfront to 30%. We do not see this as pristine habitat but

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rather artificial or restored habitat that provides the needed functions of rest, food and shelter for our endangered Chinook salmon and other aquatic species. A 12 foot tidal sweep on a vertical seawall does not provide those functions. We applaud the city for experimenting with the seawall facing-panels, but we do not favor those as an option in any but the most extreme locations where there is absolutely no choice but to have a vertical wall.

- **Diversity of habitat types**. Similar to any other functioning ecosystems, we support the installation of a variety of habitat types along the linear extent of the waterfront ranging from beaches to bird perches.

- **Human contact**. One of the major negatives of today's waterfront is the lack of direct human experience with the water. We support the addition of beaches (in addition to the ecological benefits) in the areas with the shallowest bathymetry so that humans can have more of a direct connection with Puget Sound. This connection helps bolster educational efforts about the need to protect the Sound. The addition of beaches also would provide locations for tribes to bring in canoes for their major events.

- **Enhanced recreational opportunities**. As a follow-up to the above comment, we would like to see maximum options for recreational uses all along the waterfront including water wading, bird watching, boat/cargo watching, small non-motorized craft launch and use, and tidepooling.

- **Working waterfront**. People For Puget Sound supports the continuation of a functional working waterfront. The maritime uses that are currently supported should continue. Significant income to the city from tourism-related activities should also be supported. We do not view these activities as being incompatible with environmental features and environmental stewardship.

- **Hazardous contaminated sediment sites**. Along the Central Waterfront, there are a number of locations in which the sediment is contaminated from historic sources. The DEIS should address these contaminated areas and determine the steps needed to clean them up as part of the seawall replacement process.

- **Ongoing pollution.** The DEIS should address the ongoing sources of toxic chemicals to Elliott Bay from the Central Waterfront from roadway stormwater runoff and aerial deposition. The redevelopment of this area offers an excellent opportunity to both significantly reduce these sources of pollutants and to demonstrate how it can be done well in an urban core area.

- **Strength.** Given that the seawall is no longer being required to hold up the underlying soil and weight of an elevated viaduct, the engineering should match the current project needs (1000-year earthquake for an area with minimal structures).

- **Scope**. We understood the extent of the scope of the Central Waterfront project, from 2003, to include the edge of Terminal 46. Even if construction in that area is considered part of Phase II of the project, we think that technical aspects should be included in the DEIS.

- **Statement of Needs and Purpose**. This statement should match the Central Waterfront adopted goals in the sections that related directly to the seawall and water's edge.

- **Creative methods for physical barriers.** We support the use of innovative techniques to block wave energy, where needed and appropriate along the waterfront. Ideally, these barriers could also serve ecological purposes such as bird islands or shallow water edges for fish migration.

- **Climate change.** Please consider climate change and sea level rise in all options proposed.

- **Matrices for evaluation**. Finally, please use ecological goals in defining the strengths and weaknesses of all options proposed.

We have attached images that show how habitat can be incorporated into an urban core. We would be pleased if you end up using any of these in your work. If you publish any of these, please give attribution to both People For Puget Sound and to the artist Stephanie Bowers.

Thank you for your consideration. You can reach me at (206) 382-7007 X172 if you have any questions or concerns.

Sincerely,

Heather Trim
Urban Bays and Toxics Program Manager

attachments