

Elliott Bay  Seawall  
Project

# Scoping Summary Report

September 2010

*Submitted to:*



City of Seattle  
Department of Transportation  
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# Elliott Bay Seawall Project

## SCOPING SUMMARY REPORT

### *Agreement No. T09-24*

September 2010

The Elliott Bay Seawall project is a joint effort between the City of Seattle Department of Transportation (SDOT), and the U.S. Army Corps of Engineers (USACE). To conduct this project, SDOT contracted with:

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City of Seattle, Department of Transportation  
**Elliott Bay Seawall Project: Scoping Summary Report**

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# CHAPTER 1. INTRODUCTION

## PURPOSE OF REPORT

The U.S. Army Corps of Engineers (Corps) and the City of Seattle, the non-Federal Sponsor, are preparing an Environmental Impact Statement (EIS) for a proposed seawall replacement project along the Elliott Bay shoreline in Seattle, WA. An initial notice of intent for this project was issued on March 31, 2006 (71 FR 16293). Since that time, the scope of the project has changed to include the evaluation of seismic damages and to consider additional alternatives and in June 2010, the scoping process was recommenced. This scoping report describes the 2010 scoping process and summarizes the comments received through that process. Included in this report are a brief project history, project purpose, description of alternatives being considered, documents related to the scoping process, and verbatim copies of all comments received.

## PROJECT BACKGROUND

The existing Elliott Bay Seawall provides protection to Seattle's downtown waterfront from storm waves and the erosive tidal forces of Puget Sound. It supports Seattle's waterfront surface street, Alaskan Way and other critical transportation infrastructure and utilities that serve downtown Seattle. The seawall also protects numerous commercial, public and residential structures and facilities. The seawall is 75 years old and is reaching the end of its useful life. The timber elements of the structure have experienced significant decay and deterioration from continued exposure to storm waves and tides, leading to potential structural instability. An earthquake of moderate intensity and/or duration can cause liquefaction of the soils supported by the wall, resulting in loading conditions for which the structure was not designed. Failure of the seawall under any of these circumstances would result in a high risk to public safety and substantial environmental degradation from the damage to utilities and infrastructure and release of contaminated soils and groundwater.

The seawall extends for appropriately 7,166 feet along Seattle's waterfront, between S. Washington Street on the south and Broad Street to the north. The proposed action would involve an extensive structural rebuild or replacement of the seawall in order to reduce damage resulting from storms, tidal forces, erosion and earthquakes.

The proposed action was previously considered along with the proposed replacement of the State Route (SR) 99 Alaskan Way Viaduct, which runs parallel to a portion of the seawall. The SR 99 Alaskan Way Viaduct and Seawall Replacement Project Draft Environmental Impact Statement (AWVSRP DEIS) was issued by the U.S. Department of Transportation Federal Highway Administration (FHWA), Washington State Department of Transportation (WSDOT) and the City on April 9, 2004. A Supplemental Draft Environmental Impact Statement (AWV SDEIS 1) was issued by the same parties on July 28, 2006. The AWVSRP DEIS and SDEIS 1 included evaluation of the rebuilding of the Alaskan Way Seawall because it is essential to the function of transportation facilities and is at risk of collapsing in a large earthquake. The geographic area covered in the DEIS and SDEIS 1 was virtually the same as the study area proposed by the Corps.

## **PROJECT PURPOSE**

The purpose of the proposed rehabilitation effort is to protect public safety, critical infrastructure and associated economic activities along the Elliott Bay shoreline from expected future damages associated with coastal storms, shoreline erosion and earthquake damage that could lead to failure of the existing seawall.

## **STUDY AREA**

The study area for the project is bounded by Broad Street to the north, S. Washington Street to the south, Western Avenue to the east, and extends out into Elliott Bay to the approximate western edge of the piers, which is also the approximately 50 foot bathymetric depth.

## **PROJECT ALTERNATIVES**

A number of seawall replacement alternatives are being considered including the no action alternative. Several structural, non-structural and construction technique options will be considered including soil improvement, secant piles and buttress fill, among others; more than one option may be included in the preferred alternative. Additionally, in conjunction with any of the structural options, the seawall alignment will be considered; examining where the seawall face can be reconstructed in the existing alignment or if it can be pulled back landward. Similarly, habitat restoration and recreational access options will be considered with any of the structural options.

## **NEPA AND SEPA REQUIREMENTS FOR SCOPING**

The Corps and the City are undertaking the preparation of a joint EIS that meets the requirements of both National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA), referred to hereafter as the joint NEPA/SEPA EIS. NEPA and the Corps implementation regulations require a formal scoping process when initiating work on an EIS. The City, as the local non-Federal sponsor of the project, is responsible for SEPA compliance on the project. SEPA and the City's implementation ordinance also require a scoping process and allow for expanded scoping such as is being used for this project.

As part of the scoping process, all affected Federal, State and local agencies, Native American Tribes, private organizations, and the public have been invited to comment on the scope of the EIS.

At the time of publication of the Notice of Intent (NOI) in May 2010, the following issues of concern had been identified for in-depth analysis in the DEIS: 1) construction impacts, particularly those related to noise, transportation, and effects to businesses and residences within/adjacent to the construction zone; 2) impacts associated with potential variations of existing seawall alignment; 3) potential impacts to historical properties; and 4) potential benefits to the Elliott Bay aquatic ecosystem.

## PUBLIC INVOLVEMENT PROCESS

The co-lead agencies have conducted an intensive public outreach effort as part of scoping, including required legal ads and other official notifications, additional display ads (both in print and via the internet), and the mailing of postcards to the project mailing list, including adjacent property owners.

- A federal Notice of Intent and Scoping Notice was published in the Federal Register on May 28, 2010.
- Legal notices were placed in two legal newspapers (Seattle Times and Seattle Daily Journal of Commerce) two weeks prior to the meeting, in conjunction with the SEPA Determination of Significance.
- A **postcard** was:
  - **Mailed to all** carrier routes in the project area (between Alaskan Way & 1<sup>st</sup> Avenue West-East, and between Broad St. & King St. North-South). Residents and businesses received the postcard two weeks prior to the event.
  - Mailed to relevant agency and tribal contacts.
- As available at other venues, additional **postcards** were distributed at briefings and organizations.
- SDOT staff walked through the project area and distributed copies of the scoping announcement to businesses.
- An **e-mail** was sent to key groups (businesses, neighborhood, and community groups, and City of Seattle neighborhood service centers) and the emerging project listserv/database two weeks prior to the meeting.
- An **e-mail** was also sent to elected officials including city council and state representatives.
- An announcement was posted on the project **web site** two weeks prior to the meeting.
- A **press release** was drafted distributed by SDOT and the Corps using their typical protocol to major local media one week prior to meeting.
- **Digital display ads** were placed on Bainbridge and Bremerton route Washington State Ferry flat screen televisions, and at the Colman Dock terminal.
- **Print Display ads** were placed in the following publications between one and two weeks prior to meeting:
  - Seattle Times
  - Seattle Weekly
  - International Examiner
  - Vashon Beachcomber
  - West Seattle Herald
  - Belltown Messenger
- **Online Display Ads** were placed in the following online locales:
  - Crosscut.com
  - Seattlepi.com
  - Seattleweekly.com
  - Seattletimes.com
  - Kitsapsun.com
  - Publicola.net
  - Bainbridgereview.com

- A notification was sent to appropriate City **social media** outlets that cater to the local community around the waterfront (i.e. SDOT Twitter feed and Central Waterfront Facebook page) one week prior to the meeting, and the day of the meeting.
- Calendar event requests were requested and posted on over 30 **community blogs/community calendars** (SDOT Blog, Seattle Citywide Events Calendar, The Alliance for Pioneer Square, etc.) and other associations one week prior to the meeting.

## NOTICE OF INTENT

NEPA requires that scoping begin with the publication of an NOI. The NOI for the Elliott Bay Seawall project was published in the Federal Register on May 28, 2010. The NOI described the proposed action, the regulatory environment, project alternatives, the public involvement effort, scoping meeting details and environmental review coordination efforts. The NOI also started the scoping period that ended on July 19, 2010. (The NOI, as published, can be found in Appendix A.)

## DETERMINATION OF SIGNIFICANCE

Scoping under SEPA begins with the issuance and publication of a Determination of Significance and Request for Comments on Scope of EIS. The DS includes a description of the proposal and its location and a summary of areas for discussion in the EIS. The DS also included information on submitting comments during scoping and establishes a deadline for receipt of scoping comments. The DS for this project was signed on May 27, 2010, published in the State Department of Ecology SEPA Register on June 1, 2010 and in the City's Department of Planning and Development Land Use Bulletin (SEPA Register) on June 3, 2010. The scoping comment period ended on July 19, 2010, coinciding with the end NEPA scoping period. (The signed DS can be found in Appendix B.)

## PUBLIC SCOPING MEETING

A public scoping meeting was held on Wednesday, June 16, 2010 at the Bell Harbor Conference Center along the Seattle waterfront and within the project study area. The open house ran from 4 p.m. to 7 p.m., with a presentation and opportunity for formal public comments at 5:30 p.m. The meeting notice was included in both the NOI and DS, as well as in legal ads placed in the Seattle Daily Journal of Commerce and the Seattle Times. Display ads, either in print or on websites, were placed with the Seattle PI, Seattle Times, Crosscut, Seattle Weekly, Publicola, Bainbridge Review, Kitsap Sun, Vashon Beachcomber, West Seattle Herald, Pacific Publishing, and the International Examiner. Display ads were also placed on Washington Street ferry runs to Bainbridge Island and Bremerton.

In addition, postcards were mailed to all carrier routes in the project area, with approximately 7,000 residents and businesses receiving it two weeks prior to the public meeting. The postcard was also mailed to 100 Alaskan Way Viaduct program contacts, distributed at briefings and organization meetings, and provided to the Alaskan Way Viaduct program for use at upcoming festivals and farmer's markets. (A copy of the postcard is included in Appendix C.)

A project website was also established to provide information on the project and to allow the submission of on-line scoping comments. The site, <http://www.seattle.gov/Transportation/seawall.htm>, provides a project overview and history and additional information. The site will be updated on a regular basis as the project moves forward. The Corps also has a project website that can be accessed at

[http://www.nws.usace.army.mil/PublicMenu/Menu.cfm?sitename=ELLIOTTBAY&pagename=ELLIOTT\\_MAIN](http://www.nws.usace.army.mil/PublicMenu/Menu.cfm?sitename=ELLIOTTBAY&pagename=ELLIOTT_MAIN) or through a link on the City's website.

Corps, City and consultant team staff were available during the open house portion of the public meeting to discuss the project and answer questions from the public. A copy of the display boards used during the open house is included in Appendix D. Approximately 65 people attended the public scoping meeting. The sign-in sheets are included in Appendix E.

The Corps and City gave a 30-minute presentation outlining the project history and possible alternatives and options. The PowerPoint presentation given during the meeting is included in Appendix F. The public hearing portion of the meeting followed, with four persons testifying or asking questions. The transcript of the hearing is included in Appendix G.



## CHAPTER 2. PUBLIC SCOPING COMMENTS

### SUMMARY OF COMMENT STATISTICS

A total of 39 individuals and 17 organizations submitted scoping comments on the Elliott Bay Seawall Project. The comments were submitted by a variety of means:

	Number of commentors
Comment forms submitted during scoping meeting	8
Comment submitted by e-mail during scoping meeting	1
Verbal comments directly to court reporter at scoping meeting	2
Verbal testimony during public hearing	4
Comment submitted using online comment form	16
Comments submitted by e-mail	19
Comments submitted to mail (hard copy)	6

The seventeen organizations that submitted comments were:

- AIA (American Institute of Architects)
- Argosy Cruises/Tillicum Village/Royal Argosy
- Blue Marlin Marine Solutions LLC
- King County Metro
- Muckleshoot Fisheries
- People for Puget Sound
- Port of Seattle
- Puget Sound Energy
- Seattle Aquarium
- Seattle Historic Waterfront Association
- Seattle Mariners
- United States Environmental Protection Agency
- Waterfront Ecology Team
- Waterfront Landings Condominium Association
- Washington State Department of Ecology
- Washington State Ferries
- Washington State Major League Baseball Stadium Public Facilities District

## COMMENT TOPICS

Comments received during scoping were classified under one of twenty-one different topics. A given letter, e-mail or other communication often included comments on several topics. These specific comments were interpreted and coded in an electronic database under these categories. The following table shows the number of comments by category.

Category	Number of Comments
Air Quality	5
Alignment/Alternatives	13
Cultural/Historical/Archeological	1
Construction	18
Economics	8
Energy/Climate Change	9
Geology/Soils	4
Habitat/Vegetation/Fish/Wildlife	13
Hazardous Materials	3
Land Use/Parks and Recreation	11
Noise/Vibration	6
Project Process	19
Project Cost	1
Project Design	40
Project Need	3
Public Involvement	8
Public Services/Utilities	5
Transportation	19
Visual	2
Water Quality	2
ADA/Accessibility	1

## REPRESENTATIVE SCOPING COMMENTS

All of the comments received during the scoping period are attached to this report. The Public Hearing transcript can be found in Appendix G, while all written comments (e-mail, comment cards, and letters) can be found in Appendix H. The full text of the comments is provided so that decision-makers and project staff and consultants working on the Elliott Bay Seawall Project have the opportunity to see the comments and the context in which they were provided. Pertinent comments are being considered as the project moves forward through conceptual design and environmental review; activities that are taking place after the end of the scoping period.

In order to provide an overview of the comments received, this report includes the following summary of representative comments received during the scoping period. Note, this is not meant to be a comprehensive, verbatim list of comments.

## Air Quality

- Concerned about air quality as a neighborhood resident.
- Mitigation for dust and air pollution from construction needs to be included in DEIS.

## Alignment

- Aim for adaptable, lowest-impact solution. Shoreline solution should represent best practices in green engineering. Jet-grouting is not a low impact or an adaptable solution.
- Include a greater variety of alternatives, ranging from self-sustaining beaches and natural edge conditions to a vertical wall with improved surface textures. Allow for mix-and-match alternatives.
- Extend project area and EIS scope to northern edge of Pier 46; area is target for redevelopment and seawall alternatives should not preclude future restoration.

## Construction

- How will construction affect the railroad tunnel?
- Concerned about how long the project is taking. And about safety during construction.
- Concerned about staging areas as neighborhood resident.
- Look at alternatives that reduce the amount of construction time and avoid critical tourist season because of adverse impacts on historic businesses along the waterfront.
- Organize the construction of the seawall and the upland portions of surface Alaskan Way in a coordinated fashion, because the idea is to dig once.
- Consider the use of precast concrete cells that could be installed using a clam shell excavator. The spoils could be used to backfill the previous cell. The cells could be pinned using concrete pile.
- Any decision to combine seawall construction and viaduct removal should be based solely on showing that it reduces costs and minimizes disruption.
- Close coordination with WSDOT needed, specifically construction sequencing, to ensure that construction effects on local streets, property owners and ongoing WSDOT projects are minimized. WSDOT assumes seawall construction sequencing from north to south.
- A secure perimeter should be maintained at all times around the ferry terminal for revenue control and homeland security requirements.
- Construction is planned at ferry terminal at period throughout proposed seawall construction. Coordination of construction activities and schedules with WSDOT, WSF and City.

## Cultural/Historic/Archaeological

- Respect the history of the waterfront including retaining parts or all of the historic railing. Don't overly sanitize the waterfront.
- Support engaging our history – past, present and future, promoting diverse uses and activities and the creation of urban connections to surround and immediately adjacent urban districts. Project should sustain the ecosystem of and accentuate the edge of the waterfront.

## **Economics**

- DEIS should accurately consider the existing environment that the project will impact, especially the customers of the central waterfront business community. Issues include, but are not limited to, seasonality of customers (May to early-October is peak), automobile and bus access, parking availability (including summers and weekends), through pedestrian access, and transportation functions based on the piers.
- Construction on the waterfront from May through October is potentially devastating to waterfront businesses. The only mitigation for construction during this period is compensation to allow the businesses to maintain their core staffs until the disruption is over.
- Address impacts to Port and tenant assets and operations in case of catastrophic seawall failure.
- Keep the Aquarium's survival and future in mind as you proceed through the planning process.

## **Energy/Climate Change**

- EIS should include a Sustainability Chapter that specifically evaluates the climate change impacts on the design.
- Please consider climate change and sea level rise in all options proposed.

## **Environmental Justice/Social**

- Construction plans should take wheelchair accessibility into consideration.
- ADA access to/from ferry terminal should be maintained.

## **Geology and Soils**

- What precautions are included to deal with the risk of liquefaction caused by earthquakes?
- Please address the potential that soil strengthening improvements along Alaskan Way may have a destabilizing impact on adjacent soil structure performance.

## **Habitat/Vegetation/Fish/Wildlife**

- Would like to see a minimum of 30% habitat along the central waterfront – not seawall face treatment but little beaches and other kinds of diversity. Would like to see continuous fish migration corridors.
- Speculative habitat recreation methods should not take precedence over treating the area as a transportation corridor.
- What are the best approaches to supporting aquatic and intertidal ecology and where might these approaches be viable?
- Please discuss potential for disruptions to existing habitat adjacent to Pier 66.
- Concerned about designs that result in a net filling of the aquatic environment.
- Is it possible to completely avoid jet grout, which makes the hard edge permanent, is destructive of intertidal habitat, and is difficult to remove to adapt to conditions that may change.

## **Hazardous Materials**

- The DEIS should address contaminated areas and determine the steps needed to clean them up as part of the project.

- The DEIS should address the ongoing sources of toxic chemicals to Elliott Bay from roadway stormwater runoff and aerial deposition.
- Target to remove all contaminated soils where possible, even when to do so is not necessary for project construction.

## Land Use/Parks and Recreation

- Include a dog park in the design.
- Include a children's park for residents and tourists.
- Preserve existing park at foot of Washington Street and enhance to accommodate a small craft boat launch.
- Maximum options for recreational uses along the waterfront including water wading, bird watching, boat-cargo watching, small non-motorized craft launch and tidepooling.

## Noise/Vibration

- Concerned about noise as a resident across from seawall.
- Look at alternatives that reduce the amount of construction noise.
- Re-examine locations of baseline noise measurements to reflect seawall project, rather than AWV project.
- Include noise mitigation measures in the Draft EIS.
- Extended exposure to vibration from construction equipment may make it difficult to live in nearby buildings built on piles.
- Timing with the tunnel is critical. Vibration on both sides of Western Avenue at the same time can be a problem with the fill.

## Process

- Seawall design should not prejudice waterfront master plan by defining wall location, adjacent roadway location, adjacent infrastructure or final wall profile.
- How can seawall construction be completed before feasibility studies and EIS are complete? How can seawall design be completed when waterfront design is only ½ complete?
- Reexamine schedule, priorities and methods of replacing the seawall based on primary consideration of risk, minimization of disruption to the waterfront and total cost, including mitigation cost.
- Mitigation should be fully disclosed in the DEIS.
- When comparing alternatives, use quantitative evaluation measures – impact on intertidal habitat, viability of salmon migration, viability of human access of the water, impact on water quality, and attractiveness of active water uses. Compare alternatives to the site as it was after settlement but before construction of the existing seawall.
- Please use ecological goals in defining the strengths and weaknesses of all options proposed.

## Project Design

- What is the design life of the new seawall? Can seawall be adapted to meet a higher level as sea levels rise over time? How will adjacent structures and streets be adapted to a higher seawall over time?

- Seawall, along with surface waterfront design, will significantly impact our livability into the next century. Seawall should be thought of as a living structure. One side shores up the land; the other is the aquatic community. Opportunity is to view the wall as a “Bluewall” and design and integrate the needs of aquatic ecology while holding the land.
- Concerned about configuration of street (pedestrians, vehicles, open space, trolley, mixed uses) after seawall is built.
- Come up with a range of options so that the design team is able to look at options for the edge. Would like to see a diversity of habitat options all the way along the current edge. Design does not need to be a linear straight feature, but have cutouts and diversity.
- What are the initial and future loads that will be used in engineering the new seawall?
- Create a softer edge to Elliott Bay and include many uses not currently on the waterfront, such as recreational, place for people to congregate and a better pedestrian environment for ferry users. Small beach and benefits for marine life should be considered.
- On-going seawall maintenance should be addressed under the no build alternative.
- Consider close proximity of WSF facility to seawall at north end of holding lanes during design to avoid or minimize impacts on adjacent existing pile and timber lagged walls and associated tie backs.
- Support the addition of beaches in the areas with the shallowest bathymetry so that humans can have more of a direct connection with Puget Sound.
- Support the use of innovative techniques to block wave energy where needed and appropriate along the waterfront.
- Maximize natural shoreline habitat through creation of natural beach conditions, adjacent landscape areas, and inlets which conduct storm drainage from downtown impervious surfaces by means of stream bed environments, recreating natural drainage conditions and creating a more complex shoreline environment.
- Natural erosion can be controlled with the use of a proper weep hole drain.
- The new Seattle Central Waterfront should engage and integrate the complex ecosystems that intersect at the water’s edge – marine life and health of Puget Sound, natural conditions along the shoreline and the human ecology that is an extension of city life.
- Demonstrate how the seawall design can make the water more accessible to the public.
- Alternative solutions should be developed to form a palette for use by waterfront design team, including: habitat areas, beaches, plazas/platforms/shelves stepping down to water level; new inlets/coves.

## Project Need

- Purpose and Need Statement should match the Central Waterfront adopted goals in the sections related directly to the seawall and water’s edge.

## Public Information

- Public meetings need to be held later in the day so that working folks may participate.
- Might be worthwhile to make arrangements for community meetings at places of residence.

## Public Services and Utilities

- Construction plans must include a workable plan for ensuring continued provision of utility service to waterfront customers. 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.
- Corrosion control measures for the new seawall, including coatings and cathodic protection requirements should be addressed.
- Is it possible to locate all utilities under the street, far from the water's edge, to maximize flexibility for water-side ecology and recreational uses?

## Transportation

- Concerned about access to home and garage.
- Will there be any provisions to revive the waterfront streetcar? Don't tear up the trolley tracks.
- Access to residences need to be taken into account as lane closures are contemplated during construction.
- Additional traffic during the construction period (Phases 1 and 2) from Ballard/Interbay/Magnolia that is anticipated on Alaskan Way once the Elliott/Western ramps to SR-99 are closed should be considered, as well as appropriate mitigation.
- Any reduction in available parking as a result of seawall construction should be mitigated.
- If construction occurs in summer, no parking spaces serving the waterfront should be taken by construction workers.
- Construction during summer months should provide means for accommodating existing pedestrian volumes. The existing pedestrian study for the viaduct replacement EIS is defective as it was done in November, not summer.
- Coordinate access to ferry terminal during construction. A minimum of two access points are required at all times to respond to emergency and security incidents. Ferries need to meet existing sailing schedules which are impacted by both terminal access and egress.
- Vendor, taxi and passenger pick-up and drop-off uses at ferry terminal should be considered under traffic impacts.
- Analyze potential diversion of ferry riders to alternate ferry services, highway system and transit services as a result of seawall construction.

## Visual Quality

- Nighttime construction lighting is inconsistent with a residential area. Mitigation may be possible in winter, but not in summer when windows need to be open.
- Make it pretty!

## Water Quality

- Sustainable design techniques for management of stormwater runoff should be clearly articulated and evaluated.

## Other

- There were several comments concerning the Alaskan Way Viaduct project including comments proposing the combination of the seawall and an Alaskan Way Viaduct solution.

## NEXT STEPS

As previously stated, all comments are being shared with the Corps, the City and the consultant team. This scoping summary report will also be posted on the project's website. Pertinent comments will be taken into account as the environmental and design processes move forward.

Public and agency outreach will continue throughout the duration of project planning, including project open houses, newsletters, website updates, meetings with organizations, agencies and tribal representatives.

There will be a formal review and comment process when the Draft Environmental Impact Statement (DEIS) is issued in 2011, including an open house and public hearing. Comments made on the DEIS will be formally addressed in the Final Environmental Impact Statement.



**City of Seattle**

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**APPENDIX A.  
NEPA NOTICE OF INTENT**

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*September 2010*





**City of Seattle**

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**APPENDIX B.  
SEPA DETERMINATION OF SIGNIFICANCE**

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*September 2010*





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**APPENDIX C.  
SCOPING ANNOUNCEMENT POSTCARD**

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*September 2010*





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**APPENDIX D.  
SCOPING MEETING DISPLAY BOARDS**

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*September 2010*





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**APPENDIX E.  
SCOPING MEETING SIGN-IN SHEETS**

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**APPENDIX F.  
SCOPING MEETING PRESENTATION**

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*September 2010*





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**APPENDIX G.  
SCOPING MEETING COMMENT TRANSCRIPT**

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*September 2010*





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**APPENDIX H.  
WRITTEN SCOPING COMMENTS**

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*September 2010*