

DRAFT
December 3, 2010

Angela Freudenstein
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Seattle, WA 98104-4019

RE: Alaskan Way Viaduct Replacement Project 2010 Supplemental Draft
Environmental Impact Statement and Section 4(f) Evaluation

Ms. Freudenstein,

Thank you for the opportunity to comment on the Alaskan Way Viaduct Replacement Project 2010 Supplemental Draft Environmental Impact Statement and Section 4(f) Evaluation (SDEIS). The Pike Place Market Preservation and Development Authority (PDA) operates under a charter agreement with the City of Seattle wherein the PDA serves as public trustee with the mission to ensure that the traditional character of the Public Market is preserved, oversee and manage renewal, rehabilitation, renovation, development and restoration in and around Pike Place Market including concern for rehabilitation and redevelopment of surrounding areas which may affect the character of the Market Historic District.

The Pike Place Market is one of the most significant economic, cultural and historic resources for our City and region. Accordingly, and consistent with our charter, the PDA has an ongoing interest and obligation to carefully consider the impacts related to the Alaskan Way Viaduct removal and SR99 re-routing alternatives. We have taken a strong position in support of the bored tunnel alternative because we believe that it enables the revitalization of Seattle's waterfront while maintaining important north-south transportation capacity for our region.

There are, however, issues and impacts that have not been fully addressed in the SDEIS, and we respectfully request that further analysis be conducted around the following impacts:

- Impacts to the Market due to traffic diversion and construction staging in the North and South Portals. Access and circulation during construction are both key to the economic survival of the Market. Our small businesses depend on their ability to accept delivery of fresh product during business hours. Our customers

need to know that they can get to the market and find a place to park once they get there.

- Impacts related to the demolition of the viaduct, (identified SDEIS in Phase 8) scheduled for January 2016 with an estimated active construction/demolition window of 9 months. The responsibility for demolition of the viaduct falls within the project parameters of this SDEIS.

SDEIS Comments

The PDA has carefully reviewed the SDEIS including a recent presentation by Project Director Ron Paananen. We recommend some modest proposals that will support the Market's economic viability during tunnel construction and viaduct demolition and ensure it's preservation as an important historic asset:

- During the FEIS, request that further analysis be done of construction-related impacts to truck and customer access and parking. We would request that the PDA be actively involved in this analysis and in the development of mitigations to address those impacts including review of potential replacement parking options and directional signage to assist with navigation from key access points where the north and south portal work are taking place.
- Request that mitigation resources be directed to marketing and transportation management programs during tunnel construction and Viaduct demolition.
- Request that the FEIS acknowledge and reflect the importance of the Market and Market District as a historic resource and consider appropriate mitigation measures to ensure it's preservation including a more review of Section 4(f) evaluation of the Market as a vital historic asset.
- Request that the FEIS reflect the full compliment of Social Services and social resources in the Market including the Senior Center, Pre-School, Medical Center and the Food bank.
- Request that the FEIS acknowledge potential impacts to Pike Place Market as outlined specifically in Attachment A – Comments on Specific SDEIS.

The PDA looks forward to working with WSDOT and all of the other project and program partners to realize the Full Program goals in a mutually beneficial manner while fulfilling our core mission as stewards of the Markets past, present and future in the public trust.

Sincerely,

Ben Franz-Knight
Executive Director

cc: PPM PDA Council

Attachment A

Draft Comments on Specific SDEIS

Below is a summary, identified by chapter, of potential areas of concern related to Pike Place Market.

Chapter 2 – Summary - Page 22 – Effects to Parking

The SDEIS specifically addresses north and south portal parking only, but does not mention lost parking under viaduct. While this is addressed later in Chapter 6, the Market is not identified as a specific resource that may be impacted.

Chapter 2 – Summary – Page 23 – Item 15 – Historic and Archaeological Resources.
There are a number of historic resources and districts that are identified, however, this section does not include Pike Place Market or the Market Historic District.

Chapter 2 – Summary – Page 24 – Item 16 – Community, Social Services, and Low-Income or Minority Populations.

Does not acknowledge significant Social Services Provided in the Market i.e. daycare, senior center, medical center, low-income housing, and foodbank.

Chapter 2 – Summary – page 30 – Item 21 SR 99 users – Event Traffic.

Does not include acknowledgement of Pike Place Market as regular source of “special event” volume traffic times for the Market (holiday weekends, summer, spring break etc.)

Chapter 2 – Summary – Page 31 – Item 23 – Historic Resources

List does not include Pike Place Market/Market District as a historic location that may be impacted by noise – viaduct demolition most significantly and truck traffic.

Chapter 4 – The Project Area – Page 77 – Item 7 - Typical traffic and travel conditions.

North and South portal assessment of “special event” traffic, does not address high-volume traffic times for the Market (holiday weekends, summer, spring break etc.)

Chapter 4 – The Project Area – Page 81 – Item 12 -Visual Features of project area.

“Although Pike Place Market has sweeping outward views, the colorful views from within the market are what make it unique. The market’s traditional produce and goods stalls are mixed with a broad variety of shops, restaurants, offices, and apartments. Narrow brick-paved streets, modest market buildings, and the bustle of street oriented activities make this a pedestrian-friendly environment. Victor Steinbrueck Park is a prominent part of the view both to the west and southwest.”

Worth noting for the inward focus on the market. While the actual reality of the impact of the Viaduct demolition will be a much more outward focus and presence for the Market from the waterfront perspective.

Chapter 4 – The Project Area – Page 81-82 – Item 15 – Historic Resources.

Does not directly mention Pike Place Market as a historic resource in the project area. Although diagram on page 82 (exhibit 4-17) shows the Pike Place Historic District.

Chapter 5 – Bored Tunnel Alternative – Page 104 – Existing viaduct ramp volume at Western exit is 18,100 per day.(exhibit 5-17)

Worth noting the high volume of traffic utilizing the western exit and need to study specific vehicle patterns of travel to the market and how those patterns may change and how the impact of those changes can be mitigated.

Chapter 5 – Bored Tunnel Alternative – Page 120 – item 17 – Historic Resources.

Pike Place Market/District is not mentioned as part of Historic resources that might be affected. This section of the SDEIS is important as it includes the first mention of Section 106 National Historic Preservation Act and need for mitigation measures to be addressed by a MOA (Memorandum of Agreement). The Pike Place Market should be included in this consideration.

Chapter 6 – Construction – Page 134 – Item 8 – How would the Viaduct be Removed?

“Demolition of the Viaduct is anticipated to begin in January 2016, early in stage 8, and take 9 months...Viaduct demolition activities are assumed to require two shifts per day, 5 days per week in the north and south portal areas, and two shifts per day 6 days per week along the central waterfront. Two construction teams would be working at the same time in different locations. Viaduct demolition and removal would occur from just south of S. King Street to the Battery Street Tunnel. Equipment used to remove the viaduct would include extended-arm trackhoes with concrete-pulverizing attachments (concert munchers), trackhoes with a concrete-breaking hammer attachment, manlifts, forklifts, track-mounted backhoes, and several pickup truck and dumptrucks.”

Given the duration, scope and heavy machinery involved in the demolition extensive mitigation measures need to be reviewed to address noise, traffic and access especially given the 6-day-a-week work schedule currently proposed.

Chapter 6 – Construction – Page 135 - 136 – Item 11 - Construction staging Areas.

Two staging areas present potential impacts on the Market (truck traffic, visual etc.) City of Seattle Right of Way (ROW) under the viaduct will be used for viaduct demo. BNSF/Lenora Street Construction Zone (between Pine and Bell Street) used for material storage, viaduct demo and Alaska Way resurfacing (longer term staging use). The use of these staging areas will intensify truck, machinery and material hauling traffic in and around the Market and Market District, adequate measures to mitigate these impacts will be important.

Chapter 6 Construction – Page 143 – Item 19 - Noise Impacts.

Active demo of viaduct – truck and material movement etc. may have adverse impacts on Market visitors, businesses and residents. All three distinct populations of Market/District community should be acknowledged and mitigation measures considered.

Chapter 6 – Construction – Page 144 – Item 21 – Impact on views during construction.
Viaduct demo may pose view impacts for the market and residents and guests/visitors.

Chapter 6 – Construction – Page 144 – Item 22 – Temporary Construction Easements.
This section mentions the removal, both temporary and permanent, of parking during the viaduct demolition. Beyond PC1North are there other potential impacts to direct and indirect market parking?

Chapter 6 – Construction – Page 144 – Item 23 – Impacts on local and regional economy.
This section does not address the potential economic impacts of disruption to waterfront and travel/transport routes especially given the economic importance of Pike Place Market.

Chapter 6 – Construction – Page 145, 146, 147 – Item 23 – Effects on parking.
Up to 160 parking spaces in the central waterfront area may be lost during the tunnel work (stages 1-7) and up to 750 lost during the viaduct removal (most not to be replaced). “Parking removals during viaduct demolition would make it more difficult to find parking along the central waterfront and in Pioneer Square during the demolition activities. Drivers may need to look for parking spaces several blocks farther from their destination than they normally would or use pay lots instead of on-street parking. There are numerous off-street parking lots near the central waterfront.”

Vehicles will be more likely to fill market parking lots outside of this area including Market lots – need to review mitigation measures to address loss of direct market patron parking including replacement parking.

Chapter 6 – Construction – Page 148, 149 - Item 24 – Historic Resource Impacts.
Section 4(f) review

No mention of Pike Place Market (either in text of SDEIS or in Appendix J. Pike Place Market does not appear to have been included in the list of resources evaluated for use under Section 4(f). Potential economic impacts from traffic diversions and viaduct demolition would appear to pose enough potential threats to qualify for review.

Chapter 6 – Construction – Page 156, 157, 158 – Item 37 – Construction Mitigation.
Parking Mitigation – the suggested measures include the following:

- Encourage privately held parking lots to institute measures that reward short-term parking.
- Provide short-term parking (off-street), especially serving retail and commercial areas.
- Partner with private and public parking facilities to implement e-Park, an electronic guidance system displaying real-time parking availability on right-of-way signs, facility signs, and the Seattle Parking Map website. Dynamic message signs would be located on key access points to the downtown, Pioneer Square and the central waterfront.

- Launch the Seattle Parking Map, featuring on-street parking regulations and off-street parking locations, hours of operations, and short-term parking rates.
- Develop a parking plan for construction workers to identify appropriate parking options for construction workers and discourage use of short term visitor/customer parking.
- Provide strong enforcement of short-term parking regulations in the immediate project area (two-three-block radius).

No replacement parking is mentioned or discussed, viable options and mitigation measures including replacement parking need to be considered.

Chapter 7 – Cumulative Effects – Page 162 – Item 5.

“Full program” includes the tunnel, viaduct demolition, seawall replacement and waterfront redevelopment. In total over 10 years of significant construction, traffic redirection and development, consideration needs to be given to the long-term economic impacts to the Market given the length of active construction along key access routes.

Chapter 8 – Comparison of Alternatives – Page 189-190 – Item 8 – Impacts on drivers, bicyclists and pedestrians.

Does not contemplate the potential for significant negative impacts to the Market with the Cut-and-Cover alternative and the changes to the flow of traffic on Western the alternative presents. Also does not include consideration of extensive impacts due to traffic disruption during construction of the Cut-and-Cover alternative.

Chapter 8 – Comparison of Alternatives – Page 191 – Item 10 – Change in Views.

Potential impacts to the Market from the Elevated Structure Alternative would be significant for visitors and residents.

Chapter 9 – Tolling – Page 222 – Item 14 – Potential impacts of tolling.

Based on the various tolling models there may be increased congestion and traffic volumes on surface streets, potential direct impacts on Market visitors should be reviewed possibly cross-referencing any key market patron demographic data with tolling impact demographic data.