Draft Final
Permit Strategy

Submitted to:

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SR 99: Alaskan Way Viaduct & Seawall Replacement Project

Draft Permit Strategy

Agreement No. Y-7915

Task AX

The SR 99: Alaskan Way Viaduct & Seawall Replacement Project is a joint effort between the Federal Highway Administration (FHWA), the Washington State Department of Transportation (WSDOT), and the City of Seattle. To conduct this project, WSDOT contracted with:

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Table of Contents

List of Tables

List of Figures

List of Appendices

ACRONYMS

AWVSRP Replacement Project	Alaskan Way Viaduct and Seawall
CFR	Code of Federal Regulations
City	City of Seattle
CPT	Core Permit Team
CSO	combined sewer overflow
CZMA	Coastal Zone Management Act
DAHP	Washington State Department of Archaeology and Historic Preservation
DON Neighborhoods	City of Seattle Department of
DPD and Development	City of Seattle Department of Planning
Ecology	Washington State Department of Ecology
EIS	environmental impact statement
FHWA	Federal Highway Administration
IPT	Integrated Project Team
JARPA Application	Joint Aquatic Resources Permit
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
NPDES System	National Pollutant Discharge Elimination
PE	Project Engineer

PF	Permit Forum
PS&E	Plans, Specifications and Estimates
PSCAA	Puget Sound Clean Air Agency
Port	Port of Seattle
RCW	Revised Code of Washington
ROW	right-of-way
SCL	Seattle City Light
SDOT	City of Seattle Department of Transportation
SEPA	State Environmental Policy Act
SHPO	State Historic Preservation Office
SMC	Seattle Municipal Code
SPU	Seattle Public Utilities
SR	State Route
SWPT	System-Wide Permit Team
UIC	Underground Injection Control
USACE	U.S. Army Corps of Engineers
USC	United States Code
USFWS	U.S. Fish and Wildlife Service
WAC	Washington Administrative Code
WDFW	Washington State Department of Fish and Wildlife
WDNR	Washington State Department of Natural Resources
WSDOT	Washington State Department of Transportation

Alaskan Way Viaduct and Seawall Replacement Project - Permit Strategy

1.0 Executive Summary

Construction of the Alaskan Way Viaduct and Seawall Replacement Project will be a long-term and complex project involving construction over a seven to ten year time period, coordination between several different partners, and work with a number of regulatory agencies to obtain and manage permits. In order to assure that permitting is conducted in the most efficient way possible, this Strategy Document was developed to identify potential methodology to streamline permitting practices. The methodologies presented in the document relate to timing, staffing, and procedures.

The authors used existing WSDOT and SDOT environmental procedures as a baseline and also evaluated permitting processes and agreement developed for other complex projects, such as the Sound Transit Light Rail project and the Monorail project. This document is intended to address recommendations made by the Expert Review Panel, a group that evaluated the project's schedule and procedures in 2005. The recommendations from the JLARC report, a study of permitting issues by the Joint Legislative Audit and Review Committee in 2005 were also considered and incorporated where possible.

This document does not lay out all procedural steps to achieve permit streamlining. The intent of the document is to serve as a guide for development of future work plans to achieve the strategies that have been identified and that are finally agreed upon. It is anticipated that a coordination group of regulatory agencies will be created (Permit Forum) and that the Forum will assist in finalizing a number of the strategies.

Each section of the document discusses existing and proposed measures, and the following general strategies have been identified for permitting of this project:

1. Use of interagency agreements to provide dedicated agency staff for early and on-going project technical input, guidance, and application review, along with use of a formal agency coordination group to

guide permitting efforts and assure timely transfer of information regarding impacts, regulatory requirements, schedule between the agencies and the design team.

2. Managing timing in submittal of permit applications by confirming permit linkages and timelines relative to design and SEPA/NEPA – this effort will include batching of the same types of applications, master agreements to establish special processes for issuance of overall permits with subsequent approvals, confirming with the regulatory agencies the processes needed to extend permits when they expire, and scheduling application development relative to completion of NEPA/SEPA work.

3. Creative and interactive management of permit processes and timeline. This would involve evaluating the project schedule to confirm where standard permitting practices will not achieve the project schedule and working with agencies on use of less traditional permitting procedures, particularly use of performance standards rather than specific project conditions, batching of permit applications, and development agreements to address permitting needs, processes, and opportunities.

4. Close coordination of permitting staff who will have negotiated permits with construction and compliance staff and processes in order to assure permit conditions are feasible and provide feedback to agencies on project construction methods as well as to assure that environmental commitments are carried forward into construction via construction coordination and inspections.

5. Use of formal QA/QC measures to assure product and process effectiveness.

6. Documenting permit process and decision-making in the event of legal challenge and assuring that project close-out is performed adequately to ensure permit appropriate close-out.

7. Use of change management systems to anticipate and address project scope or other changes and assuring projects schedules are updated regularly to effectively coordinate environmental and construction processes.

A number of work plans and on-going activities have been identified by this document. A number of them are underway, but not yet completed. Those work plans will be used by the Permit Team Management and

Project Permit Team to implement the strategies proposed by this document.

1.1 Introduction

This report builds on and amplifies the information contained in the *Environmental Permits and Approvals Guide prepared for the Alaskan Way Viaduct and Seawall Replacement Project* (AWVSRP), dated April 2006 (Appendix A). This strategy document lays out processes to minimize risk and maximize coordination between all parties: permit authorities, engineers, designers, permit writers, and contractors. Coordination between all parties will be necessary to ensure that the permit process runs smoothly, the permitting process stays off of the project's critical path, and the project conforms to the terms and conditions of approval during construction.

This document has been prepared to function as a living document that will be amended as needed over time and that will serve as a tool to use in developing permit applications and managing permits. The document is also intended to serve as a resource for the Permit Forum (described in Section 3) to use in confirming all permits that will be required as well as the process needed to obtain those permits. The document presents recommended approaches for permitting, which will require final agency approval.

This report provides the following:

- Review of timing for permits – when they are needed, how they fit into the overall project schedule, and which activities trigger them;
- Methodology for streamlining permit review to address how permits will be obtained;
- Identification of roles and responsibilities of the people tasked with obtaining permits and approvals;
- Discussion of processes to manage change and risk during the life of the project (regulatory changes, project changes, etc.);
- Methodology for how environmental and permitting conditions, commitments, and mitigation will be implemented and monitored;
- Discussion of what is involved in closing out permits;
- Processes for agency, internal team and contractor coordination; and
- Procedures to document the permit process.

1.2 Project Description

The existing Alaskan Way Viaduct (State Route [SR] 99) and Alaskan Way Seawall were damaged in the 2001 Nisqually earthquake, are at the end of their useful life, and must be replaced. The FHWA, WSDOT, and the City of Seattle plan to replace the existing facilities to provide structures capable of withstanding earthquakes and to ensure that people and goods can safely and efficiently travel within and through the project corridor. The SR 99 corridor provides vital transportation connections for downtown Seattle, as well as between various other regional destinations. The seawall supports Seattle's central waterfront, the Alaskan Way surface street, and numerous utilities serving downtown Seattle. The seawall also retains the land beneath the foundations of the viaduct. Failure of either structure would create severe hardships for the city and region and could possibly cause injury or death.

A Draft Environmental Impact Statement (DEIS) was completed in March 2004. The DEIS evaluated five Build Alternatives and a No Build Alternative. In late 2004 the lead agencies narrowed the five alternatives down to two (Tunnel and Rebuild) to move forward. In December 2004, the project proponents identified the Tunnel Alternative as the Preferred Alternative and carried the Rebuild Alternative forward for analysis as well.

Since that time, engineering and design have been updated and refined for the Tunnel and Rebuild alternatives. Due to the magnitude of the changes in the design of the Rebuild Alternative, it has been renamed the Elevated Structure Alternative. In addition, a number of construction scenarios have been proposed, and in July 2006, these two alternatives were further evaluated in a Supplemental Draft Environmental Impact Statement (SDEIS). This document addresses permitting processes that would be needed for either alternative.

1.1 3 Overview of Project Permitting and Risks

The AWVSRP is anticipated to take anywhere from 7 to 10 years to construct depending on the alternative and construction methods chosen. The project permitting needs are complex and the design schedule is aggressive as a matter of necessity. The project involves multiple partners, including Federal Highway Administration (FHWA), Washington State Department of Transportation (WSDOT), and the City of Seattle (City). The work involves activities that trigger over 30 types of permits and approvals, and multiple permits will be required over the life of the project. The different permits required result in the involvement of 14 federal, state, and local permitting authorities or

entities, each with its own mandates and regulations which may conflict with each other. During the design and construction process, there are likely to be changes in design concepts, as well as changes in laws, regulations, plans and policies that could pertain to or affect permitting. Site conditions may change, triggering the need for new or additional permits.

In order to achieve the project's aggressive construction schedule, permitting must be conducted as efficiently as possible. The complexity and timing of the project make avoiding schedule delays imperative since any delay would have large impacts on project costs as well as area businesses and traffic. All of the issues above make it extremely important to have a flexible strategy to obtain permits and approvals without delaying the schedule, along with a process for managing change and risks.

To that end, an integrated group of staff was brought together to develop this strategy document, and that group will continue on to assist with the navigation of the permitting process. The group will be charged with assuring that all regulatory agency issues are properly addressed and that permits are obtained in a timely manner. The team is known as the Project Permit Team and the roles of the team members, along with a proposed agency coordination process, are discussed in Section 3.1.

2.0 Required Permits and Approvals

The permits and approvals necessary for the project are separated into two groups – those required for construction and those required for operation. The construction permits are further separated into two groups: environmental permits and contractor permits. Generally, the environmental permits for construction would be obtained by the project, while the contractor permits are those to be obtained by the contractors for their specific areas of construction work. Section 2.2.2 provides additional information on contractor permitting.

For the purposes of this report the following definitions of *permit* and *approval* apply:

> A *permit* is defined as an official document required by law that gives permission for a specific activity under certain conditions. An example is a Section 404 permit issued by the USACE.
>
> An *approval* means a document or process other than a permit that requires a signature by someone in authority at an agency that has jurisdiction over a particular activity. Similarly to permits, an approval may also include specific conditions with which the project must comply. An approval may include documentation, certification, concurrence, easement or license. The Water Quality Certification issued by the Department of Ecology is an example of an approval.
>
> Note that the term *permit* may be used generically within this document to apply to both permits and approvals. Where the discussion pertains specifically to an *approval* rather than a *permit*, that distinction is made.

2.1 Activities Triggering Permits and Approvals

Based on currently-available design concepts and information available from the SEPA/NEPA process, a suite of permits has been identified that would be needed to construct and operate the project. These permits and their timelines and schedules are discussed in detail in the Environmental Permits and Approvals Guide (Appendix A). Different types of project activities trigger the need for these permits and this document discusses the potential phasing and batching of the permit applications. Table 1 shows the permits likely to be needed, as well as the general conditions and specific triggering activities (again - based on currently available design information)

In general, work in or near the water generally triggers a suite of water resource and shoreline-related permits and approvals. These include permits issued by the USACE (Section 404 and Section 10 permits), the Washington Department of Fish and Wildlife (Hydraulic Project Approvals), and the City (Shoreline Substantial Development Permit), as well as approvals by the Washington State Department of Ecology (Section 401 Water Quality Certification, and Coastal Zone Management Act [CZM] certifications).

In addition, any activity that changes the land use, disturbs the ground or involves movement of dirt triggers the need for permits, including City master use permits, grading permits, and drainage review approvals. Discharges of groundwater trigger the need for National Pollutant Discharge Elimination System (NPDES) permits both for construction and operations from Ecology. Construction dewatering may also trigger the need for an NPDES permit.

The need for approvals is also triggered by construction activities that would impact special areas of influence such as historic preservation districts (e.g., the Pioneer Square Preservation District) or areas that hold special franchises, easements or licenses. Work within City rights-of-way triggers the need for a street use permit. Note that several projects or approvals addressed in this document would generally not be considered 'environmental' permits. They are addressed here since they have high potential to negatively impact project schedule and since they will most likely be obtained by the project.

Note that neither SEPA/NEPA activities nor Section 106 (Historic Preservation Act) are included in Table 1 or discussed in detail in this document, but those environmental review processes will be completed where appropriate prior to issuance of permits. The Section 106 process is being completed concurrently with NEPA/SEPA analysis.

Changes to project scope may necessitate need for additional SEPA or NEPA analysis and it remains to be seen whether mitigation measures developed through SEPA and NEPA will require additional environmental review. However, it is assumed that the EIS will address all environmental impacts of the project including those that could result from implementation of mitigation measures. Please see Section 3.3.1 for additional discussion of SEPA and NEPA and their relation to the permit processes listed below.

1 ***Table 1 - Summary of Environmental Permits/Approvals***

Permit or Approval	Responsible Agency	General Conditions Requiring	Statutory Authority	Project Triggering Activities[1]
Federal Permits or Approvals[2]				
Clean Water Act - Section 404 Individual and Nationwide Permits	USACE	Discharging, dredging, or placing fill material within waters of the US, drainage channels with a direct connection to surface waters, or adjacent wetlands.	33 USC § 1344 33 CFR § 323	In-water work, temporary over water structures between piers, rip rap replacement, work on seawall, CSO/outfall work.
Rivers and Harbors Act - Section 10 Permit	USACE	Obstruction, alteration, or improvement of any navigable water (e.g., rechanneling, piers, wharves, dolphins, bulkheads, buoys).	33 USC § 401 et seq. 33 CFR § 322	Over water structures between piers, rip rap replacement, work on seawall and CSO outfall work.
Electrical Transmission Outage Request	Bonneville Power Administration/ Regional Transmission Authority	Clearance and shutdown of electric transmission lines.	16 USC 832a 16 USC 832b	Regional transmission line relocation.

[1] As project design proceeds, additional triggering activities may be identified. This table is subject to change.

[2] Note that Endangered Species Act approval is occurring under a separate process associated with the preparation of the Environmental Impact Statement.

Permit or Approval	Responsible Agency	General Conditions Requiring	Statutory Authority	Project Triggering Activities[1]
Marine Mammal Protection Act, Incidental Harassment Authorization	National Marine Fisheries Service (NMFS)	The "take" of protected species through activities that harass but do not harm or kill, generally through noise, vibration, or suspended sediment..	16 USC § 1361 et seq. 50 CFR §§ 101-108	In-water pile driving and any other in-water work.
State Permits or Approvals				
Clean Water Act - Section 401 Water Quality Certification	Ecology	Activity requiring a federal permit/license for discharge into navigable waters.	33 USC § 1341 RCW 90.48.260 WAC 173-225	In-water work, temporary over water structures between piers, rip rap replacement, work on seawall, CSO/outfall work (any activity that also triggers a USACE Section 404 permit).
Temporary Water Quality Modification (possibly required) – approval would most likely occur as part of the 401 and not a stand-alone approval. Approval must be issued by Administrative Order of some kind.	Ecology	Activity requiring a federal permit/license for discharge into navigable waters where water quality standards cannot be met for a short duration. Allowed on a case-by-case basis and only when no impact expected to fisheries or habitat.	WAC 173-201. A.110	Same work covered by 401 Certification, but applicable in instances where water quality standards cannot be met.

Permit or Approval	Responsible Agency	General Conditions Requiring	Statutory Authority	Project Triggering Activities[1]
Coastal Zone Management Certificate	Ecology	Applicants for federal permits/licenses associated with any over or in-water work are required to certify that the activity will comply with the state's Coastal Zone Management program (Shoreline Management Act).	16 USC 1451 et seq. 15 CFR 923-930 RCW 90.58	In-water work, temporary over water structures between piers, rip rap replacement, work on seawall, CSO/outfall work (any activity that also triggers a USACE Section 404 permit).

Permit or Approval	Responsible Agency	General Conditions Requiring	Statutory Authority	Project Triggering Activities[1]
State Permits or Approvals (continued)				
NPDES Construction Stormwater Permit (Individual, although coverage under the General permit may be available for portions of the work depending on how the project is phased.)	Ecology	All soil disturbing activities where construction activity will disturb 1 or more acres and will result in discharge of stormwater to receiving water, and/or storm drains that discharge to a receiving water. Also required if detention facilities will be constructed to retain stormwater on site.	33 USC § 1342 40 CFR Parts 122, 123 and 124, Subchapter D WAC 173-226	Overall project demolition and construction activities, including utility relocations.
State Wastewater Discharge Permit (Construction)[1]	Ecology	Discharge or disposal of municipal and industrial wastewater into surface waters, groundwater or to an NPDES-permitted wastewater treatment plant.	RCW 90.48 WAC 173-220	Discharge of process water such as that resulting from dewatering, wheel washes, or sawcutting to surface waters, groundwater or sewer system.
State Individual Wastewater Discharge Permit (Tunnel facilities permit)	Ecology	Discharge or disposal of municipal and industrial wastewater into surface waters, groundwater or to an NPDES-	RCW 90.48 WAC 173-220	Discharge of water from the tunnel during operation over the life of the facility.

[1] Control of process water could occur via this separate permit. It may also be possible to address the issue within the Individual Construction NPDES permit. The Project Permit Team will confirm need for this permit with agency staff.

Permit or Approval	Responsible Agency	General Conditions Requiring	Statutory Authority	Project Triggering Activities[1]
		permitted wastewater treatment plant.		
NPDES Municipal Stormwater General Permit (Operations) (MS4)	Ecology	Activities resulting in the disposal of waste material into a waterbody.	RCW 90.48 WAC 173-220	Modifications to and discharges to the municipal stormwater system.
State Permits or Approvals (continued)				
NPDES CSO Wastewater Discharge Permit[1]	Ecology	Activities resulting in the disposal or waste material into a waterbody.	RCW 90.48 WAC 173-220	Modifications to the combined sewer system and discharge of stormwater (to the CSO) from operations.
Underground Injection Control Registration	Ecology	Discharge of fluids to the ground through any man-made or improved hole or distribution system.	RCW 43.20A.165 WAC 173-216	Use of UICs to re-inject water from dewatering activities into the ground.

[1] SPU operates the City's Stormwater and Combined Sewage Overflow systems and manages the two NPDES permits listed in this table for these systems. Both WSDOT and SDOT are municipal permittees under the NPDES program and hold Municipal Stormwater Permits. State roadways would ordinarily be subject to the conditions of WSDOT's NPDES Municipal Permit, but in this case, since the project work will involve revisions to the City's stormwater system and the project will drain to the City's system, it is anticipated that the project will be covered under the City's NPDES Municipal Permit.

Permit or Approval	Responsible Agency	General Conditions Requiring	Statutory Authority	Project Triggering Activities[1]
Removal of Underground Storage Tanks	Ecology and City of Seattle	Removal or abandonment of underground storage tanks.	RCW 90.76 WAC 173-360 Add City code reference	Removal or decommissioning of existing underground storage tanks if discovered.
Hydraulic Project Approval	WDFW	Projects that will use, divert, obstruct, or change the natural flow or bed of any state waters (e.g., culvert work, realignment, bridge replacement), rip rap placement, work on seawall.	RCW 77.55.100 WAC 220-110	Seawall work, rip rap replacement, sheet pile walls, temporary over water structures.
Aquatic Use Authorization	WDNR	Using state-owned aquatic lands (includes harbors, state tidelands, shorelands, and beds of navigable waters).	RCW 79.90 WAC 332-30 RCW 47.12.026	Possibly for seawall work and any other proposed, use of WDNR lands.
State Permits or Approvals (continued)				
Archaeological Excavations	Washington Department of Archaeology and Historic Preservation	Excavation of archaeological objects or resources.	RCW 27.44 RCW 27.53 WAC 25-48-060	If archaeological resources are identified during construction.

Permit or Approval	Responsible Agency	General Conditions Requiring	Statutory Authority	Project Triggering Activities[1]
Local Permits or Approvals				
Environmentally Critical Areas Ordinance Review	City of Seattle Department of Planning and Development (DPD)	Construction activities that are proposed in or near designated Critical Areas. (At this time the only critical areas identified are Liquefaction and Landslide hazard Zones.)	SMC 25.09	Central waterfront work, in-water work.
Master Use Permit	DPD	All development activity. Activities in the ROW are exempt unless the ROW is in the shoreline area.	SMC 23.76	For work outside of the ROW or within Shoreline Area.
Shoreline Substantial Development Permit	DPD	Any "substantial development" within 200 feet of the waters of the state.	SMC 23.60	All work within 200 feet of the shoreline.
Grading Permit	DPD	Depending on location and zoning, construction activities that would alter grades by certain amounts or involve various cumulative volumes of excavation, fill, dredging or other earth movement require a grading permit.	SMC 22.800	Grading activities outside of the ROW. Grading within the ROW is specifically exempted from this type of permit.
Local Permits or Approvals (continued)				
Stormwater and Drainage Control Review	DPD	Any land disturbing activities or construction of new impervious surface over 750 square feet.	SMC 22.800	Most likely for work outside of ROW.

Permit or Approval	Responsible Agency	General Conditions Requiring	Statutory Authority	Project Triggering Activities[1]
Demolition Permit	DPD	Removal of an existing structure.	SMC 23.76	For removal of Viaduct or other existing structures, including buildings.
Building Permit	DPD	Design and construction of new buildings or structures.	SMC 22.100	Construction of new buildings or structures outside of AWVSRP ROW.
Side Sewer Permit	DPD	Temporary construction dewatering and discharge of dewatering to the sanitary sewer system.	Director's Rule 3-2004, and SPU Rule 02-04	For stormwater and wastewater utility work.
Side Sewer Permit	DPD	Change in connection (add or delete) City side sewers		
Seattle Noise Code – Noise Variance	DPD	Activities that would exceed established noise standards based on zoning, time of day and type of activity.	SMC 25.08	Work outside of hours established by code.
Over-the-Counter Contractor Permits	DPD	Various building and construction activities including Mechanical; Electrical; Sign; Elevator; Fire Alarms; and others.	SMC Title 22 Uniform Building Codes	Contractor schedule for these triggering activities - items such as electrical, plumbing, and mechanical work, temporary and permanent signs, installation of fire alarms, construction and use of elevators, energy inspections and several others.

Permit or Approval	Responsible Agency	General Conditions Requiring	Statutory Authority	Project Triggering Activities[1]
Local Permits or Approvals (continued)				
Street Use Permits (typically obtained for these types of activities) o Utility work o Construction Traffic Approvals o Tree removal/ protection	City of Seattle Department of Transportation (SDOT)	Various activities requiring improvement, modification, or use of a public ROW.	SMC Title 15 City Ordinances 117393 and 108200 SMC 15.04	Any work within City ROW. Activities that require the detour of traffic or that will result in large truck traffic in the Downtown Traffic Control Zone, removal or decommissioning of existing underground storage tanks,
Historic District Approvals o Pioneer Square Preservation Board o International Special Review District o Pike Place Market Historical Commission	City of Seattle Department of Neighborhoods (DON); Preservation Boards	Any proposed new buildings or structures, or changes to existing buildings/structures within the historic district, require review.	SMC 23.66 SMC 25.24	Work in any of these historic districts. Three separate approval processes.
Landmark Building Approval	City of Seattle Department of Neighborhoods (DON)	Activities that might impact a designated landmark.	SMC 23.47	Buildings 25 years or older may qualify as landmarks.

Permit or Approval	Responsible Agency	General Conditions Requiring	Statutory Authority	Project Triggering Activities[1]
Construction Dewatering Approval	King County	Discharge of water from construction dewatering activities into sanitary sewer system (Elliot Bay Interceptor).	KCC 28.84	Discharge of water from construction dewatering activities into sanitary sewer system (Elliot Bay Interceptor).
Side Sewer Permit, for Construction or Repair	DPD	Repair of existing or construction of new side sewer connection to public sewer system.	SMC 21.16	Excavations that may require temporary removal and replacement of existing side sewers.

2.2 Construction Permits

This section discusses the permits that will be required to construct the project and documents which agency will issue them. Permits will be obtained by either the project or the contractor.

2.2.1 Permits and Approvals to be Obtained by the Project

The project will be responsible for obtaining permits and approvals requiring complex long-term agency negotiations and appeal processes. Permits to be obtained by the project are the following:

Federal Permits/Approvals

- Section 10/404 Permit from USACE
- Electrical Transmission Outage Request from Bonneville Power Administration
- Marine Mammal Protection Act Incidental Harassment Authorization from NMFS

State Permits/Approvals

- State Individual Wastewater Discharge Permit from Ecology
- Hydraulic Project Approval (HPA) from WDFW
- Aquatic Use Authorization from WDNR
- NPDES and State Wastewater Discharge Permits (Construction) from Ecology
- State Waste Discharge Permit (for operation of tunnel facilities) from Ecology
- Section 401 Water Quality Certification with possible Temporary Water Quality Modification from Ecology
- Coastal Zone Management Certificate from Ecology
- NPDES Municipal Phase I Stormwater and Combined Sewer Overflow Permits (operating permits) from Ecology [5]
- Archaeological Excavation Approval from DAHP
- Underground Injection Control Registration from Ecology

[5] SPU will be the entity responsible to assure these two NPDES permits are in place. The project team will work with SPU as needed to assure project compliance with the permits.

Local Permits/Approvals (From City of Seattle unless noted otherwise)

- Environmentally Critical Areas Ordinance Review
- Master Use Permits
- Shoreline Substantial Development Permit
- Street Use Permits
- Historic District Approvals (Pioneer Square Preservation Board, International Special Review District, Pike Place Market Historical Commission)
- Landmark Building Approval Side Sewer Permits for Dewatering
- Construction Dewatering Approval - King County
- Stormwater and Drainage Control Review[6]
- Grading Permit(s)
- Noise Variance
- Side Sewer Permits for Dewatering
- Side Sewer Permits for Connecting/Disconnecting Sewers

Appendix C, Permit Team Membership, provides current contact names and information for staff who would be working on these permits.

2.2.2 Permits and Approvals to be Obtained by the Contractor

The following construction-related permits will be obtained by the contractor:

- Building permits
- Electrical permits
- Mechanical permits
- Elevator permits
- Demolition Permit
- Other over-the-counter permits related to specific construction codes and standards (plumbing, fire alarms, etc.)

These are all issued by the City of Seattle. Contractor bid packages will include a specification requiring the contractor to obtain appropriate permits and to meet the terms and conditions of permits. The project will work closely with contractors to ensure that permit conditions are consistent with permits previously issued and that permits are obtained in a timely manner. Additional contractor permit requirements and coordination activities are being evaluated by the project. See also Section 3.3.4 for discussion of coordination with contractors on permitting.

[6] The Permit Core Team will coordinate on environmental issues as needed, but the design team will be primarily responsible to obtain this approval.

2.2.3 Main Points and Recommendations

- **Use of staff with specific expertise and who can undertake permit work with a long lead time to obtain more complete permits on the project's schedule.**

2.3 Operational Permits

Operation of either the Tunnel or the Elevated Structure alternative will require two NPDES permits from Ecology. These are two existing City NPDES permits, administered and overseen by Seattle Public Utilities (SPU).

The first permit is the National Pollutant Discharge Elimination system Waste Discharge Permit No. WA 003168-2 , which governs the management of combined sewer overflows (CSOs) in the City. The other permit is the National Pollutant Discharge Elimination System and State Waste Discharge General Permit for Discharges from Small Municipal Separate Storm Sewers for the Cedar/Green River Water Quality Area and the portion of the Kitsap Water Quality Management Area located in King County., Permit # ???? This permit governs the management of stormwater in the City and went into effect on August 4, 1995. It technically expired on July 5, 2000, although it has been extended by Ecology until a new permit has been completed. The City is in the process of negotiating a new NPDES permit with Ecology. That permit is in draft form and is expected to be final and in effect on ??? These two permits include water quality and quantity limits for discharges of stormwater and CSO into Elliott Bay.

SPU is responsible for coordinating with Ecology and the project on these two permits. City staff will be the lead point of contact for communication and coordination with Ecology as these permits relate to AWVSRP utility (stormwater and sewer) relocation or replacement. SPU and the project will work closely on any potential modifications that Ecology may require to these two existing permits, in order to ensure that permit conditions are consistent with the planned operation and construction of the chosen alternative.

A third operational permit that would be required is an NPDES Waste Discharge Permit for the tunnel alternative in order to control stormwater and any groundwater seepage that might occur. A series of catch basins, drains, and pumps associated with the tunnel would eventually route water that enters the tunnel to Elliot Bay. The project would apply for this permit.

The remaining sections of this document lay out the specific strategies to be employed in obtaining project permits.

2.3.1. Main Points and Recommendations

- **Use existing permits where possible.**
- **Engage in close coordination with the City on environmental issues (permit coverage and stormwater design in particular)**

3.0 Permit Acquisition and General Application Process

As discussed previously, the majority of permits required for this project will be applied for by the project. The team of staff who will be working on permitting is specifically known as the Project Permit Team. Representatives on the Project Permit Team and a proposed group of regulatory agency staff members to be known as the Permit Forum will coordinate to provide input on application development. This Section describes: the overall Project Permit Team components, organization, and roles and responsibilities; the general permit application process; strategies for how permits and approvals will be obtained; how permit conditions will be developed and incorporated into the project; and how permits and approvals will be managed through the life of the project.

Appendix B, Permit Responsibility Matrix, expands on Table 1 of this document and provides information on: agency staff currently associated with project permitting, the Team staff permit lead, appropriate application materials, duration of permits, and prerequisites to obtain these permits. Appendix B serves as the preliminary guide for staff preparing permit applications to assure that permitting occurs in the sequence required. Assumptions set out in this appendix will need to be validated by the regulatory agencies

3.1 Project Permit Team

The Project Permit Team is the organizational structure for obtaining project permits. It consists of an affiliation of three groups: the Permit Strategy Team, the Project Core team and support staff from the Integrated Project Team.

This section describes the roles and responsibilities of the team members as well as the anticipated role of the proposed agency coordination group that will interact with the PPT - the Permit Forum (PF). It is hoped that the PPT and PF staff will function as an integrated team to accomplish the project's permitting objectives. Figure 1 shows the organizational structure of the PPT and how the Permit Forum would interact with this group

3.1.1 Permit Team Organization

The Permit Team is a group of City and WSDOT staff who have been working hand in hand to develop permit processes and strategies for the project. Their work is lead by the Permit Team Manager. The City staff are from various departments including the Department of Transportation (SDOT), Seattle Public Utilities (SPU), and Seattle City Light (SCL). It is anticipated that representatives from the Seattle Fire and Police Departments and the Seattle Department of Planning and Development (DPD) will be added.

Figure 1 Team Organizational Structure

The Permit Team is responsible for assisting in the development and implementation of the permit strategy. The team provides strategic advice on permit streamlining, construction coordination, and compliance, and internal City of Seattle processes. The team may also assist in the peer review of permit applications as they are developed, and in some instances will take primary responsibility to obtain specific permits or approvals (e.g., City Light staff will obtain BPA approvals and SPU is responsible to updating the City's stormwater and waste discharge permits) etc.).

3.1.2 Permit Core Team

The Permit Core Team consists of a team of consultants that brings permit application development, process management, and agency coordination expertise to the project. This team is managed and directed by the Permit Team Manager. The group's responsibilities include:

- Coordinating development and on-going revision of the permit strategy;
- Holding weekly permit strategy meetings, including assuring that meetings are scheduled and minutes are taken;
- Assisting in managing and coordinating Permit Forum Meetings;
- Preparing and updating the permit schedule and integrating it with the overall project schedule;
- Coordinating with the Integrated Project Team staff to obtain information and materials for permit applications;
- Preparing permit applications;
- Maintaining records and documenting the permit process;
- Assisting the Permit Team Lead in overall coordination of the permit process;
- Tracking permit review and responding to agency comments; and
- Working with the project Environmental Compliance team to ensure that permit conditions are incorporated into construction bid documents and that project work complies with permits.

3.1.3 Integrated Project Team Support

Interacting with the two groups discussed above is a third set of staff who are part of the larger Integrated Project Team [1] that is developing the AWVSRP. These staff members bring with them the technical details and expertise needed to inform the permitting process. These staff matrix in from their organizations to support WSDOT's project permitting effort. The interaction of the rest of the Project

[1] The Integrated Project Team consists of engineering and technical staff from the lead agencies and consultants who are responsible for coordinating on project design elements and who will support the preparation of permit application materials.

Permit Team with this group is coordinated and managed by the Permit Team Manager. Upon request, the IPT support teams will provide required exhibits, plans, and technical information needed to complete permit applications. The team will also incorporate mitigation plans and environmental commitments developed as part of the EIS and all applicable permit conditions into project plans. Coordination with this group will also help convey out and reinforce the impact to permitting from changes in project scope and schedule.

3.1.4 Permit Forum

The Permit Forum, a group to conduct a formal partnering effort, is in the process of being formed. It is anticipated that it will consist of regulatory staff from the various federal, state, and local agencies that will be reviewing permit applications and issuing permits. The agencies that will be represented should include: Ecology, WDFW, USACE, WDNR, NMFS/USFWS, and the City (SDOT and DPD). Some of these representatives are WSDOT liaison staff that work at the various federal and state agencies. The role of the Permit Forum is generally to facilitate and streamline permit review to ensure issuance of permits in a timely manner.

Assuming that the Permit Forum operates similarly to WSDOT's MAP team, that team concept works to coordinates agency review processes. At meetings of the MAP team, the project can be described to all agency staff at one time, questions and responses from each agency staff members are heard by all other agency staff members, and any feedback given to staff developing the permit applications is heard by all agencies. This can help assure that conflicting directions on approach or data needed are not given by different agencies. The MAP team itself also takes the primary responsibility to resolve any differences in agency approaches or requests, rather than the staff who are developing the applications. Any differences in approach that agency members may have are discussed and resolved by the team. This team approach also makes it easier to obtain quick feedback from agency staff when needed since the team concept itself imparts a high level of accountability for agency actions and responses. Using a permit development and review process similar to the MAP team process along with staff dedicated to the project, is one of the major streamlining tools recommended in this document.

The Permit Forum will begin meeting during early project design and plan development, beginning in early 2007. The Permit Forum will establish its own operating procedures. This group's process should include:

- Participating in on-going and numerous project development and pre-application meetings
- Providing review of project design submittals and plans at increasing levels of detail;
- Conducting early review of permit applications, and notifying the group working on the applications of the need for changes or additions prior to completion of environmental review;

- Providing guidance on how SEPA/NEPA mitigation measures will be integrated into permits where needed;
- Providing draft conditions and/or permits for review prior to issuance to allow resolution of potential conflicts;
- Working collectively to assure an efficient permitting process with no conflicting permit conditions; and
- On-going site visits as needed to personally review project components and impacts.

It is anticipated that the forum will continue to meet during construction to keep the permitting agencies up to date on construction details and potential permit issues.

3.1.5 Main Points and recommendations

- **Use of formalized agency coordination group to maximize communication**
- **Use of staff expertise as dictated by interlocal agreement to obtain permits**

3.2 Dedicated Staff

A primary strategy to ensure timely and consistent permitting efforts is to use dedicated agency staff for the project. This type of staffing model has been proven effective on other large, complex state projects. Dedicated staff on behalf of the regulatory agencies would need to be available to participate in project discussions and activities when needed in order to keep the project on schedule. Without this critical component, the project's chances of success would be diminished. Where interlocal agreements have not yet been completed, completion of those agreements will be important in order to assure that funding is committed and duties are clearly identified

3.2.1 State and Federal Agency Staff

WSDOT has provided staff on the project development teams, as well as funding for dedicated staff at USACE, NMFS/USFWS, Ecology, and WDFW to assist with permitting and project review. Regulatory agency staff may be needed for short-term intensive activities and will be needed regularly for the duration of the project. The concept is to provide for a lead staff person responsible for coordinating permit reviews at the agencies. However, while WSDOT is funding liaison staff positions at these agencies, the liaison staff members are not assigned solely to this project; therefore, it is recommended that interagency agreements be clarified to ensure that adequate dedicated resources are provided for the project.

3.2.2 Dedicated City of Seattle Staff

The City is currently providing dedicated staff to serve as members of the IPT and to coordinate interdepartmental document review. The City further plans to fund additional staff in the Department of Planning and Development (DPD) and the Street Use Division to assist with obtaining City permits and the ongoing management of those permits. There will be a City Lead responsible for coordinating the review of permits through the City departments. The project Permit Team Manager and the City Lead will be the primary points of contact for coordination on City environmental permits. SPU will also be responsible for negotiations with Ecology and for updating its existing NDPES stormwater and CSO operational permits. As with federal and state agency staff, City staff may be required for short-term peak times, as well as for extended periods of time, and interagency agreements will need to be signed, if not already completed, to document funding sources and identify roles and responsibilities.

3.2.3 Main Points and Recommendations

- **Use of dedicated staff at regulatory agencies via interlocal agreements**

3.3 Generalized Permit Process

This section provides a guide to the process that will be followed for permitting activities. Improvements to this process may be identified as project work proceeds and the Permit Forum will need to discuss and approve the final process. Figure 2 is a flow diagram of the anticipated generalized permit process for the overall project.

Figure 2 Flow Chart of Permitting Process

3.3.1 Timing

There are many points in the permitting process that can cause delays in obtaining permits. These include submittal of incomplete applications, difficulties in setting pre-application meetings, for projects with a federal nexus the length of time to complete the NEPA process, and numerous and lengthy appeal processes. The project will employ several strategies to minimize time delays typically encountered during the permitting process. These are described below.

A main strategy recommended in this document is to submit permit application packets prior to the issuance of the final SEPA or NEPA EIS, after the design concurrence milestone[1] has been reached. This should allow sufficient review time so that the only impediment to a permit decision would be the issuance of a final SEPA EIS for state and local permits, and the issuance of a Record of Decision (ROD) for federal permits (see Figure 2). During the review period, permitting agencies will inform the Permit Core Team of application deficiencies. The Permit Core Team will in turn provide additional information needed to complete the application packet. The Permit Forum will play a critical role in keeping the application process moving relative to SEPA/NEPA efforts.

City and state permits cannot be issued prior to completion of the SEPA environmental review. After the issuance of the FEIS (anticipated in late 2007), the project will 'decouple' the SEPA and NEPA processes by issuing a SEPA Notice of Action Taken. At this point, barring an appeal, SEPA will be complete and SEPA documents will be submitted to permitting agencies. Once SEPA is complete, the permit applications should be complete and can undergo any necessary public review. Public review and hearings should generally take 30 days after which City and state permits can be issued. City permits have a 10- to 21-day appeal period following issuance. State permits have a 30-day appeal period following issuance.

The SEPA process will be completed earlier than the NEPA process and federal permits cannot be obtained until after the issuance of a NEPA FEIS and subsequent issuance of the Record of Decision, 90 days later (early 2008). Federal permits may be issued following issuance of the ROD if there are no legal challenges.

3.3.2 Obtaining Permits and Approvals

It is anticipated that permits will be obtained in one of three ways. The first approach is a project wide permitting process, and it refers to the process of obtaining one permit (Corps 404 permit for example) to cover all activities over the life span of the project. The second approach involves entering a master agreement

[1] The Design Concurrence Milestone occurs at the end of preliminary or conceptual design and requires approval by WSDOT, SDOT, and FHWA.

with the City for City permit processes to allow one overarching approval by Commission for activities such as shoreline substantial development, followed by administrative approvals for additional project work under the applicable code. A third strategy involves obtaining discrete permits requried for specific actions. These types of applications may be submitted in batches or individually. Staff of the Permit Core Team are working with the Permit Team to develop specific language for City permitting agreements. Table 2 shows the initial recommendation for how applications and permits could be packaged and issued.

3.3.2.1 Project-Wide/One Permit for the Life of the Project

For the AWVSRP, there are a number of activities for which project-wide permitting makes the most sense and for which the regulatory agencies would most likely require one project-wide permit in any event. The advantage of obtaining one permit to cover the entire project is a reduction in the number of opportunities for appeals. The potential disadvantage may come later in the project if site conditions were to change, if the scope of construction activities were to change, or when permits expire. These conditions would require permit amendments or extensions. Permit amendments would generally be subject to public review and appeal periods, which could impact the project schedule.

If appeals of the revised or extended permit were filed, stop work orders might need to be issued until the appeals were resolved. Section 3.4.4 describes how performance-based permit conditions may be used to minimize the need for permit modifications. Section 3.5 describes the strategy to resolve changed conditions by identifying a process which will be used when conditions change to the extent that permit amendments are required.

The federal and state permits listed in the first column in Table 2 typically are issued for the life of the project. The timeframe for obtaining these permits, particularly the Section 404/10 permit can be long, as the permit requires coordination on the state's Section 401 and CZM Certifications, as well as compliance with the Endangered Species Act, Marine Mammal Act, and Magnuson Stevens Fishery Act. In addition, there are several opportunities for appeal of state permits, potentially causing the permit approval to be delayed. It makes sense to apply for the permits for in-water work for the life of the entire project, with an understanding that the permits may need to be extended or re-issued over time since the construction period for the project will exceed the lifespan of most permits.

The City permits listed in column 1 of Table 2 (noise variance and stormwater review) may also be issued for the life of the project. The noise variance code is in the process of being updated and, in its new form, will be amenable to providing permit coverage for the entire project. Stormwater and drainage control is being coordinated as part of the project design, with City staff participating as members of the IPT. Drainage features are being addressed and designed comprehensively to manage the entire project's construction and operational stormwater runoff. The

shoreline substantial development permit could be applied for either as a life of the project permit or a master agreement/phased permit as described below. The Shoreline Substantial Development permit would be a particularly good candidate for life of project permitting if the AWVSRP facility is deemed an "essential public facility" by the City[1]. The facility is already defined as such by state standards.

Whether obtaining one project-wide permit or an overall permit with subsequent approvals as discussed below, the benefit of the single permit for the life of the project is that it provides a degree of certainty regarding approval conditions (i.e., the design team would know the exact construction criteria or conditions).

3.3.2.2 Project-wide Master Agreement with Subsequent Approvals

This permitting strategy involves obtaining one master permit for the life of the project under the terns of a development agreement that establishes a process to obtain subsequent phased approvals as the project proceeds. This type of agreement has been executed before. For example the City entered an agreement with Sound Transit for the Central Link Light Rail project that allowed for the review of phased or batched permits via an overarching 'master' agreement. The agreement is found in a 2000 Memorandum of Understanding, as well as in City ordinances approved by City Council. The agreement requires concurrent review of permit submittals by the DPD and SDOT and allows the issuance of construction permits by these agencies throughout the life of the project. It is proposed that similar 'master' permit agreements be developed for the AWVSRP jointly by the Project Permit Team and City for the following:

- Seattle Shoreline Substantial Development Permit
- Master Use Permits (MUP)
- Seattle Street Use or Improvement Permits

It seems likely that for regulatory actions such as shoreline substantial development permitting, not enough project detail would be available during the period established on the project schedule for permitting in order to issue the standard type of shoreline permit. The Master Use Permit would establish performance standards for the project, under which subsequent shoreline approvals could be issued administratively. The administrative permit process would be quicker than the Council process for the Type 4(?) permits. Subsequent shoreline approvals would then be requested as design detail becomes available. The schedule and geographic

[1] An Essential Public Facility includes those facilities that are typically difficult to site, such as airports, state education facilities and state or regional transportation facilities, state and local correctional facilities, and solid waste handling facilities.

location for the individual design elements to be addressed under subsequent approvals would determine how and when the permit applications are packaged.

3.3.2.3 Discrete Permit Applications

There are specific State permits that would be issued for particular activities. There are also specific City permits that would be issued for specific activities or for work on individual sites associated with the proejct. Applications for discrete City permits could be batched based on type of activity or location. A development agreement may need to be in place with the City to facilitate an efficient batch reivew process of discrete permits.

Batching of permit applications was accomplished under the terms of the interlocal agreement for the Central Link Light Rail project. Any similar agreement with the City for this project should also address batch processing of the discrete permits that would be obtained by the contractor. Batching of permits, whether the applications are submitted by the Project Permit Team or the contractor, should provide a benefit to the City by making the application process more efficient. There will be a large volume of permit applications submitted to the City over the years of project construction, and processing them individually though a standard process is likely to negatively impact the project schedule.

As an example of how permit batching would work, side sewer and demolition permits are generally issued as discrete permits; however, it would work well to process these discrete permit applications in batches based, perhaps, on geographic areas. For the purposes of the environmental impact statement and design, the project has been divided into the south, central waterfront, north waterfront, and north sections. If the project is sectioned off in a like manner for the purposes of construction, then this approach would be beneficial. For side sewer permits the City could review all the side sewers affected within each city block.

Some of the activities associated with the AWVSRP would be either located within or adjacent to three special districts: Pioneer Square, International District, and Pike Place Market. Each of these areas has special approval processes that are administered separately. The board/commission reviews the proposed activity using its regulations and guidelines. The board or commission then makes recommendations to the City Department of Neighborhoods as to whether the Certificate of Approval should be issued, issued with conditions, or denied.

There are buildings classified as Landmark Buildings that may be impacted by the project. In order to make alterations to those structures, specific approval would be required from the Landmark Preservation Board. The process for this approval is generally similar in nature to the special districts described above.

The Permit Core Team will coordinate with these special district Boards to determine the most efficient method of submitting materials and obtaining

approvals. Discussions with the District Boards will clarify whether all activities proposed within each of the districts could be addressed by one approval of each Board.

3.3.2.4 Permits Obtained By The Contractor

The contractors will be responsible for obtaining the permits for which they are responsible in a timely manner. It is anticipated that the project permit team will remain closely involved with contractor permitting activities to assure that, for permits with specific environmental conditions, the permit conditions are consistent with permits previously issued. This involvement with contractor activities will also help assure that the contractor is applying for permits as necessary and will assist the team in ensuring contractor compliance with permit conditions.

The construction contract(s) will specify additional permitting requirements for the contractors to complete and once a contractor is on board, they will be responsible to complete construction-based permits. This will require coordination and development of a communication plan. The Permit Core Team will work closely with the Compliance Team, which is leading the development of this plan.

This communication plan should include, but not be limited to expectations concerning:

- coordination meetings to confirm contract environmental issues and progress;
- nature and timing of written correspondence
- points of contact;
- forwarding of permits obtained by Contractor to the Permit Core Team;
- filing of permit documentation;
- any special protocols by which contractors will obtain permits from the city; and
- protocol for contractor self-reporting of potential permit violations.

It is anticipated that at least some contractor permits may be obtained in batches. It may not always be possible to batch permit applications, simply due to the nature and timing of construction and the potential for different contractors to provide different pieces of project work. For the permits that the contractor will obtain, it will be their responsibility to identify the most logical construction timing sequence and need for permits for specific pieces of work, and batching simply may not be an option. In those cases, the contractor would apply for individual permits. However, the use of dedicated staff along with development agreements to be proposed to the City to streamline permitting should help provide for expedited application review.

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Table 2 – Summary of Permitting Packaging Strategies

PROJECT-WIDE PERMITS		DISCRETE PERMITS			CONTRACTOR PERMITS
One Permit for Life of Project	Master Agreement/Phased or Batched	By Activity	For Facility Operation	By Geographic Area or Site	City/State
▪ Section 404/Section 10 permit issued by USACE ▪ Hydraulic Project Approval (HPA) issued by WDFW ▪ Section 401 certification and Temporary Water Quality Modification if needed issued by Ecology ▪ Coastal Zone	▪ Shoreline Substantial Development Permit issued by the City ▪ Master Use Permits (MUP) issued by the City ▪ Street Use or Improvement Permits issued by the City	▪ State Wastewater Discharge Permit for construction process water discharge issued by Ecology ▪ Grading permit issued by the City ▪ Electrical Transmission Outage Request ▪ Underground Injection	▪ NPDES Municipal General Stormwater Permit (MS4) issued by Ecology ▪ NPDES Wastewater Discharge Permit for CSO Operation issued by Ecology ▪ State Individual Wastewater Discharge Permit for Tunnel Operation issued by	▪ Pioneer Square Preservation Board Approval ▪ International Special Review District Approval ▪ Pike Place Market Historical Commission Approval ▪ Landmark Building	▪ Building permits ▪ Electrical permits ▪ Mechanical permits ▪ Plumbing permits ▪ Elevator permits ▪ Fire Code Inspections ▪ Energy Code Compliance and

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Management approval issued by Ecology ▪ Aquatic Land Use Authorization issued by WDNR ▪ Noise Variance issued by the City ▪ Stormwater and Drainage Control Review issued by the City ▪ MMPA Incidental Harassment Authorization issued by NMFS ▪ Construction Stormwater Individual Permit issued by Ecology [1]		Control Registration	Ecology	Approval ▪ Side Sewer Permit issued by the City ▪ Construction Dewatering Approval issued by King County ▪ Demolition Permit issued by the City ▪ Removal of Underground Storage Tanks ▪ Archaeological Excavations ▪ Evironmentally Critical Areas Ordinance Review	Approval

Footnote: Note that the Individual NPDES Construction Permit is listed as a life of the project permit. One project SWPPP will initially be prepared, and that SWPPP will be amended as the project proceeds, based on contract, geographic area, or other criteria to be determined.

3.3.3 Main Points and Recommendations

- **Choose early timing of permit application submittals relative to completion of SEPA and NEPA**
- **Engage in early coordination with the City to discuss and concur on methods of submittals and packaging including: electronic submittals and special permit intake processes**
- **Use of 'non-standard' permit processes to keep permitting on a faster track such as master agreements to establish processes for City permits (phased shoreline permits and batching of permits including contractor permits)**
- **Obtaining project-wide permits as soon as possible to provide a degree of design assurance and start any appeals as soon as possible**
- **Work with agencies on procedures to extend permits when needed**

3.4 Developing Permit Conditions

It is anticipated that staff of the Permit Core Team will work closely with the Permit Forum as permit conditions are developed to assure consistency among permits and help assure that permit conditions are implementable. Proactive coordination with design work will also occur to help assure project impacts are addressed and that conditions are incorporated to design plans as early as possible.

3.4.1 NEPA/SEPA Commitments and Mitigation Plans

The Permit Core Team will serve as a resource to the Permit Forum to help ensure that environmental commitments and mitigation measures developed during the EIS process are incorporated into permits and approvals. The Environmental Compliance Team (ECT) Lead who will have primary responsibility to translate permit conditions into contract language will also participate in this permit development effort. The ECT Lead will work with the NEPA/SEPA Team Lead to forward SEPA/NEPA mitigation issues as well as final permit conditions to the design team for incorporation to the project plans. Section 4.1 also discusses this issue in more detail.

3.4.2 Standard Permit Conditions

There are standard permit conditions that typically accompany the various types of permits. The Permit Forum will work with the Permit Core Team to identify standard permit conditions and areas where performance might better meet

regulatory requirements and goals of the project. The Core Team will also work with the Environmental Compliance Team Lead on this task.

Many permit conditions are commonly based on known and accepted construction Best Management Practices (BMPs). For example, many permit authorities recognize and require Ecology's *Stormwater Management Manual for Western Washington* BMPs for managing erosion and stormwater runoff during construction to be incorporated into project design. The City of Seattle has a similar set of design guidelines, *City of Seattle Standard Specifications for Road, Bridge, and Municipal Construction,* 2005, Section 8.1, that the project is anticipated to follow. The Permit Core Team will work with Integrated Project Team staff to assure that appropriate BMPs are incorporated into the plans and documents as part of the application submittal packages.

Typical BMPs may not always be appropriate for the proposed construction methods and there will be some construction methods which will be left up to the contractor to identify. For these types of situations, the project environmental and permitting needs would be best served by employing performance standards rather than typical BMPs.

3.4.3. Performance Standards

Use of performance standards is now widely accepted in the permitting of construction projects. Performance standards provide specific outcomes which the project must attain to be in compliance with permits. For example, instead of specifying that straw bale BMPs be used to slow down water and filter out sediment, a performance standard would instead specify that appropriate BMPs be used to minimize runoff velocities and retain sediment on the site.

The use of performance standards has proven to be effective when properly managed. Performance standards also ensure that the contractor retains responsibility to design and implement BMPs that work rather than simply relying on pre-determined BMPs.

Some permitting agencies have extensive experience relying on performance standards in addition to typical BMPs. It would be necessary to introduce the topic and discuss it in some detail for agencies that have not previously used that method.

The Project Permit Team will work with the permitting agencies to promote the use of performance standards where appropriate. The Project Permit Team may also consider involving the permitting agencies in development of the environmental portion of the construction contract. This will promote project understanding among the permitting agencies, assist in developing trust among the personnel involved, and give the permitting agencies a sense of "buy-in."

3.4.4 Main Points and Recommendations

- **Identify internal coordination processes to translate agency coordination into design and construction documents**
- **Proactively reviewing standard permit conditions with agencies and getting that information into design as early as possible.**
- **Use of performance standards to speed permitting and establish maximum flexibility for the contractor(s)**

3.5 Permitting Through the Life of the Project

3.5.1 Change Management System

Because of the long time frames and the complex nature of the project, it is necessary to create a process for managing change. It is vital to have a plan in place with the design team and permitting authorities so that changes made during the permit process do not unduly delay permit approval. In addition, it is important to have a process for managing change during construction. A change management plan will be developed by the Permit Core Team to account for changes in project design, regulations, and project conditions. The change management plan will include, but not be limited to:

- Design-freeze (This concept gives design a goal date by which to incorporate as many of the project elements as possible in order to avoid permit modifications or changes during the application process, and avoids daily changes during the application process. If changes do occur, it gives design a second design-freeze date by which to incorporate changes comprehensively.);
- Communication plan for interactions between all members of the Project Permit team to assure information on project changes is conveyed as early as possible;
- Forms for recording design changes affecting a permit application;
- Forms for recording construction changes that affect the permitted description of the work under a particular permit; and
- Use of the project's commitment database with its attendant tracking of responsibilities by the Environmental Compliance Team..

3.5.2 Permit Renewals

Most permits for this project have a regulatory time frame with expiration, while some do not. Potential strategies with regard to permit time frames have received a preliminary review by the Project Permit Team and are being more fully investigated. One strategy is to identify permits that could be issued with longer than typical time frames. A second strategy is to evaluate vesting regulations to determine how best to assure that all phases of the project, which will be under construction for many years, can be assured to be constructed as planned and conditioned. The Permit Core Team will fully develop these strategies in coordination with the Permit Forum. Use of dedicated staff working on the project (both on the Project Permit Team and the

1 Permit Forum) will help identify and implement consistent and effective permitting
2 strategies in this regard over the life of the project.

3.5.3 Main Points and Recommendations

- **Use of a change management plan to create efficient process to address change when it does occur with associated use of contingency planning, to include: design freeze concept, communication plan with documentation of changes**
- **Work with Permit Forum to proactively flesh out permit renewal processes**

4.0 Tracking Permit and Mitigation Commitments

The following management strategies or tools will be employed to conduct this task:

- communication plan and staff coordination;
- commitment tracking database;
- use of contract documents; and
- coordination of permit timing and design.

Implementation of these strategies is the responsibility of the Project Compliance Team. The Permit Core Team will assist the Compliance Team in the development of these procedures. WSDOT's *Environmental Procedures Manual, M31-11 March 2006, Part 5* outlines the process whereby mitigation and permit conditions are incorporated into contract documents and tracked through project construction. The project will be following these procedures.

4.1 Mitigation and Permit Conditions/Commitments

EIS mitigation measures and applicable permit conditions will need to be provided to the contactor for implementation and compliance as part of the contract scope. Environmental commitments and conditions will be translated into special provisions of the contract and become conditions of performance. Under the terms of the construction contract, the contractor will be responsible for complying with all federal, state, and local rules, regulations, and permit conditions related to environmental protection and worker health and safety.

The Permit Core Team will have worked with the agencies to obtain permits and will be the best source of information on any potential subtleties of those approvals. The Environmental Compliance Team will be primarily responsible to translate that permit information into contract plans and specifications. The Permit Core Team's continued involvement in that process of translation will help assure accurate incorporation of that information into the construction bid documents and contracts

where appropriate. This activity will also require close coordination with the NEPA/SEPA team lead.[1]

Once permits are received, the Permit Core Team will make certain they are forwarded to the Environmental Compliance Team in a timely manner, and that group will be responsible to enter permit requirements to the tracking database that will be developed, and to further assure permit compliance as construction proceeds.

Commitments contained in policy guidance and interagency agreements will also be included in construction contract documents as applicable for implementation by the contractor. Environmental aspects of these documents will be included in the contractor documents and tracked by the Environmental Compliance Team Lead.

4.2 Commitment File

Commitments identified during initial design and subsequent project phasing will have been incorporated into the overall project Commitment File and maintained for the duration of the project by the ECT Lead. In addition, conditions attached to each permit will be included in the Commitment File. Commitments that are the contractor's responsibility will also be added to the commitment file. The commitment file to be developed will e bas4d on protocols established by WSDOT's Environmental Procedures Manual.

4.3 Main Points and recommendations

- **Use of specialized and dedicated staff (ECT Lead) and formal and informal processes to interact with contractors and construction team**
- **Use of existing coordination procedures as a baseline**
- **Coordination of project staff with expertise to assure environmental information is translated to contacts correctly**
- **Use of formal commitment file to track and document environmental processes and issues**
- **Careful use of contract documents to accurately convey environmental issues and to control contractor activities related to permits**
- **Use of regular site visit by ECT staff t help assure compliance per permits**

[1] The NEPA/SEPA Team Lead is a member of the Integrated Project Team.

5.0 Risk Management System

5.1 Permitting Risks Currently Identified

Table 3 shows the activities and issues that have been evaluated and considered to pose risks to successful permitting of the project, along with methods to address those risks. This section includes the issues identified by the Expert Review Panel analysis of the project, completed in September of 2006. The information in this section should serve as a basis for on-going discussions by stakeholders to identify any further risks and appropriate risk management tools as the project proceeds.

Table 3 Project Permitting Risks

Risk	Method to Address	Status
Permit applications are not submitted on time, causing schedule delay	Assure team includes adequate numbers of trained staff to prepare applications and coordinate with agency staff	Teams, staffing, and procedures are in place
	Assure project team coordination procedures are in place to obtain design information when needed	Communication and coordination protocols to be confirmed and followed
	Permit strategy developed to guide process and timing	Draft Strategy complete
	QA/QC process to assure adequate documents and procedures	Overall QA/QC measures for the project will be followed. Draft Strategy includes specific QA/QC measures for permitting
Permits are not issued at anticipated time, causing schedule delay Or Legal challenges prevent activation and implementation of permits	Provide for dedicated regulatory agency staffing and agency senior management involvement	Some staffing agreements are in place; others are needed
	Enter Permit or Development Agreements to streamline permitting, consolidate reviews, resolve disputes, etc	Need to initiate detailed discussions with City o Seattle in particular
	Pursue legislative changes to streamline permitting	The Permit Team is currently pursuing shoreline code amendments to City code.
	Work with regulatory staff to define performance standards and assure permit conditions are feasible and implementable	Teams are in place (Project Permit Team and Permit Forum) to address
	Develop contingent schedule in the event of potential appeals or legal action	Project Permit Team to work with design team to address schedule questions and work not requiring permits

	Work with agencies to define lead project work that may proceed prior to permits (staging area activities etc.)	Project Permit Team to work with design team to address schedule questions and work not requiring permits
Permit linkages are not adequately identified	Incorporate information into base schedule	Project Permit Team to provide on-going coordination with design and scheduling staff.
Permits expire before work can be completed	Development of permitting agreements with agencies specify procedures for permit renewals or modifications Use of Permit Forum process to facilitate extension processes Permit Forum can assist in prioritizing work phases to maximize permit time.	Project Permit Team is in place to work with agencies and determine best process to address
EIS process is not completed on current schedule delaying issuance of permits	Develop contingent schedule Complete 'at-risk' applications	Project Permit Team to to work with scheduling staff to address impacts as needed. Draft strategy recommends proceeding with permit submittals prior to completion of SEPA/NEPA process
Work is stopped during construction due to unanticipated environmental conditions (Unanticipated archeological resources, wet conditions, construction stormwater management problems, or contamination)	• Project Permit Team to develop agency coordination and contractor procedures and process to address • Project Permit Team also to develop non-dependent work plan to allow unaffected work to continue	Compliance Team is being assembled and will address Project Permit Team to work with design and scheduling staff to identify these measures.
Project design changes during construction putting the project out of regulatory compliance (i.e. permits need modification or no longer apply)	Develop and implement change management plan to address	Project Permit Team developing the plan

5.2 Quality Assurance/Quality Control Plan

The Permit Core Team will draft a written QA/QC Plan for permitting that will provide for an independent level of quality assurance through management, product reviews, and audits to assure that the project's overall requirements for quality control are being met. This section discusses those plan elements, which will be consistent with the *Program Quality Assurance/Quality Control Plan* developed by Hatch Mott McDonald, which outlines the overall framework for implementation of quality for the design and construction of the AWVSRP.

5.2.1 Quality Assurance/Quality Control for the Permitting Process

All permit applications and support materials developed for the project will go through a QA/QC process. The purpose of the process is to help ensure that

application materials are complete and to reduce the number of potential requests for additional information from regulatory agencies. In addition to evaluation of document adequacy, the procedures for permitting coordination and application development will be regularly 'audited' by the Project Permit Team to confirm their adequacy and ease of implementation. As a final QC check, the overall effectiveness of the QA/QC procedures will be revisited by the Permit Core Team on a regular basis to ensure they are working as intended. The Plan may be amended as needed. The Plan will include but not necessarily be limited to the following components: 1) clarification of roles and responsibilities; 2)staff training on QA procedures; 3) quality audits; 4) document control and filing; 5) internal checks and peer reviews; 6) process evaluations; and 7) lessons learned. A QA/QC Manager will be assigned to assure compliance with the Plan for the permit process.

5.2.1.1 Permit Document Quality Assurance/Quality Control

All permit application materials will receive at least two rounds of evaluation. The initial draft will be prepared by staff of the Permit Core Team and will receive technical review by other members of the discipline involved. After that review, and after any required changes have been made to the permit document, a second draft will be prepared and submitted to the IPT where it will be evaluated by a QA/QC team chosen based on their involvement with the project and area of expertise. This QA/QC team can vary by type of permit document. This team will use a checklist to be developed by the Permit Core Team to provide comments on this second draft. Once any revisions are made, a final draft package will be prepared, reviewed, and approved by the Permit Team Lead. The Environmental Manager will have final review and approval authority. At this point, the application materials will be ready for submittal to the regulatory agencies via the Permit Forum or other method determined by the PF team's charter.

5.2.1.2 QA/QC Checklists for Permit Deliverables

QA/QC checklist(s) will be developed by the Permit Core Team for use by members of the Project Permit Team and regulatory agencies. The checklists will most likely be based on existing checklists used by the WSDOT MAP team and the regulatory agencies and will address timing for submittal information as well as completeness of application packets. The checklists will be used prior to and concurrently with development of the application materials being discussed with the Permit Forum, in order to assure that the applications contain all necessary materials. The checklists will address specific permit deliverables and will identify the persons preparing the materials as well as those reviewing. The checklists will generally include, but not be limited to, the following information:

- confirmation that all items are included as required by the agency(ies);
- review of written materials for adequacy, accuracy, and consistency with other project documents – with space to document problems, and proposed recommendations or requested changes;

- verification of calculations;
- review of CADD, GIS, and any other drawings and graphics to assure that they meet format and content requirements;
- confirmation that the materials appropriately address requisite SEPA/NEPA mitigation measures; and
- formatting and spell checking.

The checklists will include space for signatures by all parties and will document the QA/QC process for permit applications. The checklists will be included as part of the documentation files for the project.

5.2.2 Regular Review of Procedural Quality Assurance/Quality Control

Senior staff on the Project Permit Team will conduct QA/QC control reviews to verify that procedures are working as anticipated and desired. Some elements that will be checked during the QA/QC process reviews include:

- Staff qualifications and staffing levels;
- Completeness and organization of permit-related project files;
- Thoroughness of application development; and
- Effectiveness of agency coordination including conflict resolution measures.

The actions that constitute QA/QC measures for environmental compliance during construction are briefly addressed in Section 4.0 of this document. Construction management practices will follow WSDOT standard protocols for quality control.

5.3 Main Points and Recommendations

- **Use of risk management processes to preliminarily and continuously identify risk and develop mitigation measures**
- **Use of quality control and assurance measures to assure effective permitting processes and adequate documentation**

6.0 Permit Close Out

Permit close out involves coordination with permit authorities, documentation of inspection and monitoring results, and file maintenance. It is anticipated that the Project Permit Team's coordination of close-out activities with the regulatory agencies will occur via the PF process. Compliance reports must be filled out after project completion. Typically, these are compiled annually by WSDOT Regional Environmental Offices and submitted to Maintenance and Operations staff at headquarters. Permit close out procedures will be developed for this project by the Project Permit Team using WSDOT procedures and guidance.

Construction work on contracts financed in whole or in part with federal funds are subject to final inspection and final acceptance. Project type and size determine whether FHWA, the WSDOT Headquarters Construction Office, or Regional Office will conduct the final inspection.

Final inspections are performed on all federally aided projects any time after 90 percent completion and no later than 30 days after physical completion. Final acceptance reports will be completed on the AWVSRP and will be completed by the construction project engineer as soon as all project requirements have been met. The ECT Lead will be involved in the final inspection to assure environmental issues have been resolved. Some environmental commitments will require a final inspection and notification of completion to the resource agency. The Environmental Manager will make that final agency notification.

6.1 As-Built Drawings

Submittal of as-built drawings to the City is anticipated to be a condition of permits issued. Permit related or not, this transfer of information will need to occur in a timely manner since it has specific implications for on-going maintenance and development activities around the City. Development of the AWVSRP will involve revisions to sewer and other underground utility systems. This data transfer process is anticipated to include checklists and an as-built plan tracking system to ensure transfer of as-builts and its implementation will be included as part of the project's close-out procedures. The Project Permit Team will coordinate with the IPT to develop a process for tracking transfer of as-built drawings to the City.

6.2 Main points and Recommendations

- **Coordination with permitting agencies through project closeout to assure coordination and closure of environmental issues**

7.0 Formal Agency Coordination

7.1 Communication Protocol

7.1.1 Internal Project Permit Team Communications

Internal Project Permit Team coordination will be accomplished by locating all members of the group in the same physical space at the AWVSRP office to assure direct access and through regular meetings such as the weekly one held by the Permit Strategy Team. The weekly Permit Strategy Team meetings include most of the Project Permit Team members. This meeting is held weekly to discuss permitting issues and project developments, and to identify risks and opportunities affecting the permit process. The agendas for these meeting will be prepared by the Permit Core Team.

All internal communications should be directed through the Permit Team Manager or her designated alternate. It is anticipated that communications will occur in both formal and informal processes. The Permit Team Manager will track project progress.

Project Permit Team members will need to keep the Permit Team Manager informed regarding work progress, status of deliverables, project issues, work schedule changes, and other relevant information. Members will report to the Permit Team Manager if circumstances arise that interfere with their ability to complete their work.

7.1.2 Project Permit Team Interface with Regulatory Agencies

It is critical to project success to facilitate regular and successful interactions with agency permit writers One of the main strategies in this regard is to develop user friendly ways to keep agency staff apprised of project schedules and contract ad dates and inform them in advance of application submittals, or submittals of revised materials or agency requested information. Potential coordination methods currently identified are: regularly-occurring (frequency to be determined) meetings; informing agencies in writing of when there will be 30, 60, or 90 percent submittals; establishing a single point of contact for agencies to call with questions; providing presentation and other materials to agencies to give them an idea of the level of effort they will need to put forth to support the project. It is anticipated that the Permit Forum will stay in place through construction.

A second strategy of the team approach is to prepare a project activity report that describes the activities involved with each permit application, the design effort in support of permits, and recent project activities and developments. This report will help to keep permit review staff briefed and up to speed on the project, as well as to document permit activities. Tracking the permit activities may also reveal ways to further streamline the permitting effort.

7.2 Documentation

7.2.1 Documentation of Interactions Between Project Permit Team and Permitting Authorities

The Permit Core Team will document all formal communications with permitting authorities. The communications files will be maintained in the AWVSRP office by the Permit Core Team and will include the following items:

- Permit agency meeting minutes;
- Project Change Forms;
- Permit Forum session minutes;
- Agency Correspondence – letters, e-mails, record of communications, including permits and letters of approval or notices of violation

Documentation procedures will be conducted in concert with the overall document control procedures established by Parsons Brinckerhoff for the project.

7.2.2 Critical Decisions/Agreements/Reasons Decisions Were Made

It is important to have a record of both what decisions were made and why they were made in regard to the project permitting effort. This information may be critical for project appeals or litigation where it may be necessary to demonstrate why certain decisions were made that affected project design, construction means and methods, compliance with permit conditions, and implementation of mitigation measures. Recording these decisions is also important to enable the team to learn what worked and what didn't, so these lessons can be applied to further permits for the project or to future projects. The Permit Core Team will be responsible for preparing a quarterly report that describes these decisions. SDOT and WSDOT Legal staff may be involved in developing the final protocol for this effort.

7.3 Agreements

7.3.1 Agreements to Streamline Permitting

Development agreements for permit streamlining should be pursued with the City of Seattle for this project. Examples of this type of agreement are the ones that the City entered into with Sound Transit and the Seattle Monorail Authority. These agreements specified the process and procedures to be used for streamlining the City's permit review. They also provided certainty in processing permits in a timely fashion by identifying roles and responsibilities for the staff dedicated to work on these permits (both at the City and the transit agencies) as well as the general process of permit review.

The City of Seattle agreement with Sound Transit allowed for an overall blanket permit from the City for activities such as side sewer connections. The City reviewed each side sewer connection, but issued one overall permit per contract for this work. Because of the large number of side sewer connections that will be affected by the AWVSRP, there may be opportunities to develop performance standards that can be applied to the connections, thereby enabling the use of a blanket permit for the entire project (versus the need for hundreds of side sewer permits). There were also agreements between and between City departments such as SPU and DPD, which allowed SPU to issue.

Agreements entered into with the City for the AWVSRP will need to include but not be limited to:

- Staffing levels and availability including specific roles, responsibilities, and expectations, as well as management of those staff;
- Funding for the appropriate staffing;
- Definition of permit processes and timelines (such as batching processes for application submitted by the Project Permit Team and contractors, specific intake procedures, and review time);
- Dispute resolution procedures; and
- Processing and coordination of potential appeals.
-

7.4 Main Points and Recommendations

- **Specify internal team and agency coordination measures to assure successful working relationships (i.e. keeping agencies apprised of upcoming submittals and design reviews)**
- **Use of documentation to clarify issues and create a legal record**
- **Use of interlocal agreements to facilitate permitting**

8.0 Schedule

Permitting timelines need to be integrated to the overall project schedule on an on-going basis. This step is particularly important because it gives all staff working on the project a common understanding and expectation for how long the permit process will take. The intent is to keep permitting off the critical path of the project. The permit schedule will show all logic, including design milestones of plans supporting permit applications, in order to be certain the design is tracking with the anticipated permit timelines. The Permit Core Team will continue to work with scheduling and design staff of the Integrated Project Team to assure that information on status of environmental processes is accurately incorporated to the project schedule and that design schedules accurately reflect that status.

Schedule information developed for managing the project will also be shared with the Permit Forum to keep them apprised of project progress as well as the role of environmental permitting in the project timeline.

8.1 Main Points and Recommendations

- **Use of schedule information to keep regulatory agencies apprised of progress and timing needs and to keep design and construction staff informed on process timing**

Appendix A

Environmental Permits and Approvals Guide – To Be Added

Appendix B

Permit Responsibility Matrix

Appendix C

Project Permit Team Membership

Figure C-1 shows the currently-proposed AWVSRP Project Permit Team organization. Kate Stenberg is the overall Environmental Manager for the AWVSRP. Her role is oversight of the entire environmental compliance process (NEPA and SEPA processes and permitting). Sandy Gurkewitz is the Project Permit Team Lead and has responsibility for leading and coordinating the Project Permit Team and acquisition of permits and approvals through the life of the project.

Figure C-1 Team Organizational Structure

Table C-1 below provides the current contact information for the entire Project Permit Team including name, Project Permit Team function, phone numbers, and e-mail address.

TABLE C-1 Project Permit Team Contact Information

Name	Role	Agency or Association	Office Phone	Alternate Phone	E-Mail
Kate Stenberg	Environmental Manager	Washington State Department of Transportation			
Sandy Gurkewitz	Permit Team Manager Manages project permitting processes	Seattle Department of Transportation	206-267-3784	(206) 484-7498	gurkews@wsdot.wa.gov
Kathy Fendt	Permit Core Team	Parametrix	(206) 267-3833	(425) 681-5505	fendtk@wsdot.wa.gov kfendt@parametrix.com
Jesse Halsted	Permit Core Team	Parametrix		(503) 704-7044	halstej@wsdot.wa.gov jhalsted@parametrix.com
Chad Durand	Permit Core Team	Anchor		(206) 409-1862	cdurand@anchorenv.com
vacant	Permit Core Team	Consultant			
vacant	Permit Core Team	Consultant			
vacant	Permit Core Team	Consultant			

Name	Role	Agency or Association	Office Phone	Alternate Phone	E-Mail
Joyce Kling	Permit Team	Seattle Department of Transportation			
Joy Keniston-Longrie	Permit Team	Seattle Public Utilities			
Gavin Patterson	Permit Team	Seattle Public Utilities			
Laurie Geissinger	Permit Team	Seattle City Light	206-386-4585		laurie.geissinger@seatle.gov
Scott Powell	Permit Team	Seattle City Light			
TBD	Permit Team	Seattle Department of Planning and Development			
Gwen McCullogh	Environmental Compliance Team Lead	Washington State Department of Transportation			
Rick Conte	Utilities Lead				
Katherine Cassedy	Traffic Team Lead				
Steve Pearce	Urban Design Team Lead				

Name	Role	Agency or Association	Office Phone	Alternate Phone	E-Mail
David Mattern	SEPA/NEPA Team Lead				
Tim Dougherty	Design Team Lead				
Ralph Graves	Construction Lead				
Alec Williamson	Design Team member				
Todd Hudack	Right of Way Team Lead				
Dan McKillop	Project Management A… Consultant title?				