King County

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September 22, 2006

Kate Stenberg
Alaskan Way Viaduct Environmental Manager
999 Third Avenue, Suite 2424
Seattle, WA 98104-4109

Dear Ms. Stenberg:

Thank you for the opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Alaskan Way Viaduct (AWV). This letter details comments from King County Department of Transportation (DOT). Some of the concerns are highlighted below; more detail is provided in the full comments found in the attachments to this letter (Attachment 1).

L-013-001

First, we would like to state that all of our comments on the Draft Environmental Impact Statement (DEIS) are still applicable (Attachment 2). In the DEIS letter dated June 1, 2004, DOT noted concern about construction and operational impacts to transit access and operations, Paratransit service, pedestrian access and freight mobility.

Thank you once again for producing a high quality document with helpful and understandable graphics. We applaud your effort to make environmental documents readable, which has made our review more effective.

Transportation

L-013-002

Easy access to downtown Seattle from the south, central and the north end is important to maintain and attract downtown commuters to continue to use transit. Therefore, transit mobility and reliability for downtown transit service need to be considered during and after the construction period.

We will continue to work with the project team to determine how transit will move safely through anticipated bottlenecks, and to identify changes to bus stops and other facility improvements. Facilities and treatments required to accommodate transit operations and minimize transit delay on access routes to downtown should be developed for the preferred alternative and included in the Final Environmental Impact Statement (FEIS).

L-013-003

Coordinated Construction Mitigation Plan

There are several regional transportation projects that are expected to occur during the seven to ten year reconstruction period for the AWV. It is critical that these mitigation plans are coordinated and sequenced in order to deliver efficient and effective services to the

L-013-001

Please see L-005 for response to your June 1, 2004 Draft EIS comment letter. Thank you for your careful review of the Draft and Supplemental Draft EISs.

L-013-002

The Final EIS has been prepared in close coordination with King County, and we greatly appreciate your assistance.

The Washington Department of Transportation, the City of Seattle, and King County Metro have developed a mitigation program to address construction impacts. This program includes expanded public transit service along the affected corridor. The project includes new facilities that would enhance speed and reliability of transit services in the project corridor. These enhancements include a northbound shoulder bus lane on SR 99 between Holgate Street and north of Dearborn Street in the SODO area. Also, a bus-only lane would be provided in the north area of the project corridor in the vicinity of Aurora Avenue and Denny Way.

L-013-003

One of the main benefits of the Bored Tunnel Alternative is the ability to maintain operations on SR 99 throughout the construction period. Current construction plans call for a relatively short (several-week) closure during the end of construction to connect the tunnel with the remainder of SR 99. A detailed discussion of the construction effects on transportation facilities and services is provided in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report. This discussion includes an assessment of the effects of concurrent construction projects on transportation facilities and services. Also included in Chapter 6 is a listing of the planned construction mitigation activities.

L-013-003 community. We suggest that the FEIS include a description of how the cumulative construction impacts of multiple concurrent projects will be monitored, and how a mitigation program will be managed dynamically to address them.

Because of changes in access to downtown Seattle, transit priority measures such as shoulder transit lanes should be considered on First Avenue South, the Denny Way ramp area, and the Pike/Pine and Madison/Marion corridors, especially during construction. In addition, King County believes it is necessary complete the Spokane Street Viaduct and the Lander grade separation projects prior to construction start of the AWV.

L-013-004 Adequate Funding for Construction Mitigation
During reconstruction of the AWV, the impacts to transit will be significant. Metro transit is working with the AWV team to develop a comprehensive set of transit mitigation measures that are required to support the transit service during the reconstruction. We strongly support the 31 strategies included in the document, and appreciate the collaborative approach that the AWV team is taking to develop these concepts further. However, we want to emphasize that the size and cost of the mitigation program should not be limited by any placeholder budget assigned to these items in the SDEIS. Costs should reflect the transit priority measures needed, the additional service needed to provide mobility, and the unmitigable cost to transit of longer trip time, both through the Central Business District (CBD) and approaching the CBD on I-5, Aurora Avenue North, 15th Avenue West, Spokane Street South, and other corridors that will be affected by construction traffic diversion and delay. When these costs are better understood and disclosed in the FEIS, the size and cost of the mitigation program should be revisited prior to the Record of Decision to reflect the true costs of mitigation.

L-013-005 Analysis of Construction Impacts to Transit
The size and extent of the transit mitigation program should be based on an analysis of the travel time and reliability impacts along key transit corridors, rather than on an analysis of specific intersections alone. Transit agencies have made an effort to propose routings for the construction period that would concentrate transit service along a minimum set of street segments where priority treatments would be applied. The construction management plan included in the FEIS should be based on an analysis of the total delay expected for transit along each of these corridors from end to end by time of day and at each major stage of construction.

L-013-006 Mitigation Beyond Transit
During construction of the AWV, all the traffic that currently uses the AWV will be dispersed to roadways throughout the region. Mitigation for this project must be expanded to include intelligent transportation systems (ITS) projects throughout the region to help keep transit and vehicles moving.

L-013-007 Shorter Construction Preferred
Due to the high inflation rates for construction and the disturbance to Seattle streets, King County prefers the shorter construction period.

L-013-004

As part of the Bored Tunnel project and related projects, WSDOT and partner agencies have or will implement several strategies to keep traffic moving during construction. For example, both the south and north portal configurations include bus priority lanes to provide reliable travel times for SR 99 transit service into and out of downtown. The streets that transition between SR 99 and the downtown street grid are designed in a manner that meets the city's Complete Street goals and include treatments for pedestrians, bicycles, freight, and adjacent land uses.The agreement signed by the Governor, County Executive, and Mayor in January 2009 described a program of independent yet complementary projects for replacing the Alaskan Way Viaduct and providing a strategy for overall mobility in Seattle. The State is responsible for replacing the viaduct, the City for the seawall and central waterfront, and the County accepted responsibility for additional RapidRide and express bus service, with some identified as construction mitigation. These future transit service improvements have benefits independent of replacing the Alaskan Way Viaduct. WSDOT recognizes the funding anticipated in the agreement has not been realized, and that the recent economic downturn has reduced other funding sources King County currently relies on for providing transit service throughout King County.

Currently, WSDOT is providing funding for King County on the S. Holgate Street to S. King Street Viaduct Replacement Project to provide additional transit service hours to help mitigate the effects of construction. This program is ongoing and regularly monitored to evaluate its effectiveness. For the Alaskan Way Viaduct Replacement Project, WSDOT will continue to evaluate the need for increased bus service in the West Seattle, Ballard, Uptown, and Aurora Avenue corridors during the initial portions of the construction period, as well as a bus travel time monitoring system.

WSDOT will prepare a traffic management plan, which will contain

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South Park Bridge

L-013-008

The South Park Bridge carries 14th and 16th Avenues South over the Duwamish River in the South Park neighborhood and is scheduled to be replaced in 2010-2012. This bridge carries 20,000 vehicles per day and is an important regional link connecting southwest King County to the manufacturing/industrial centers of the Duwamish area and various arterials leading to downtown Seattle. If the replacement bridge construction project is not fully funded by 2010, King County will close the bridge due to safety concerns. This closure will severely impact traffic on First Avenue South Bridge, doubling delays at intersections immediately north of the bridge, which will reduce traffic flow at these intersections to Level of Service F during both commutes. In addition, the completion of the SR 509 link between SeaTac and I-5 will add 20,000 vehicles per day to the First Avenue South Bridge and the South Park Bridge will be a critical facility in mitigating these heavy volumes.

In the event that funding for the South Park Bridge is not obtained, the South Park Bridge will be closed at some point during the construction of the AWV project. The AWV project will need to plan for and mitigate the additional traffic on the First Avenue South Bridge when the South Park Bridge is closed. Should funding be secured to replace the South Park Bridge and the project is constructed concurrently with the AWV project, then only minor closures of the South Park Bridge would occur with minimal impact to the AWV project.

King County looks forward to working collaboratively with the AWV team to develop the construction mitigation plan and to add detail to the preferred alternative in the FEIS.

Sincerely,

Harold S. Taniguchi, Director
King County Department of Transportation

Attachment 1: Specific comments from DOT on the Supplemental Draft Environmental Impact Statement
Attachment 2: June 1, 2004 letter outlining King County's comments on the Draft Environmental Impact Statement

localized traffic mitigation measures. These measures will be developed as construction details are refined. Please see the Final EIS, Appendix C, Chapter 6 of the Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

L-013-005

The Final EIS provides travel time tables that show the anticipated effect of construction activities on transit. The travel times presented in the Final EIS are for the stage of construction that is expected to have the most extensive travel delays. The results indicated relatively small changes in travel times between the baseline and construction scenarios.

L-013-006

As part of the Bored Tunnel project and related projects, WSDOT and partner agencies have or will implement several strategies to keep traffic moving during construction. For example, both the south and north portal configurations include bus priority lanes to provide reliable travel times for SR 99 transit service into and out of downtown. The streets that transition between SR 99 and the downtown street grid are designed in a manner that meets the City's Complete Street goals and include treatments for pedestrians, bicycles, freight, and adjacent land uses.

The agreement signed by the Governor, County Executive, and Mayor in January 2009 described a program of independent yet complementary projects for replacing the Alaskan Way Viaduct and providing a strategy for overall mobility in Seattle. The State is responsible for replacing the viaduct, the City for the seawall and central waterfront, and the County accepted responsibility for additional RapidRide and express bus service, with some identified as construction mitigation. These future transit service improvements have benefits independent of replacing the Alaskan Way Viaduct. WSDOT recognizes the funding anticipated in the agreement has not been realized, and that the recent economic

Attachment 1: Specific Comments from King County Departments

Department of Transportation:

L-013-009 Transit Access to Downtown Seattle from the South

Since the Seneca Street and Columbia Street ramps will be eliminated, the most likely transit routing from SR 99 to downtown Seattle from the south will be to use the ramps in the vicinity of King Street and to access the downtown street system using S. Main or S. Washington Street. Since the DEIS was published and based on the recent discussion with AWV project staff, our understanding is that the King Street ramp will be the sole access point to/from SR 99 from the Seattle CBD. The ramp is also used as access and egress to the stadium vicinity and may likely be congested during the special events. The FEIS should assess the likely delay to transit making the movements between SR 99 and the downtown street system, and include transit priority treatments necessary to ensure that transit will have a reliably clear path to enter and leave the CBD. Transit priority measures such as shoulder transit lanes should be considered to ensure transit would operate reliably through anticipated bottlenecks and long signal cycles near ramps. The movement between Alaskan Way and Main or Washington St. should be limited to transit vehicles to avoid attracting general-purpose traffic to these routes.

L-013-010 The intersections at 1st Avenue/Atlantic Avenue and 1st Avenue/Royal Brougham are expected to be more congested than today. For transit service to function effectively on 1st Avenue through the area, transit priority treatment(s) are needed to maintain transit speed and reliability.

L-013-011 To provide mobility from south Seattle to downtown for both vehicles and freight, two projects need to be completed before the construction of the AWV- the final phase of the Spokane Street project (Phase 1V) and the Lander Street grade separation. Lander St. is needed to provide a fast and reliable route between the Spokane St. viaduct and the E-3 busway. If the Lander St. grade separation cannot be completed before AWV construction begins, a reliable alternative transit route must be defined to bring West Seattle transit riders into the CBD during the construction period.

L-013-012 Transit Access to Downtown Seattle from the North

The SDEIS includes changes to transit access into downtown Seattle from Aurora Avenue N. under the "lowered Aurora" options. If these options are selected, it will influence Metro's access routes and requirements to enter the CBD. Metro operates both local and express services in this corridor, having different access requirements.

Use of the Denny Way ramps is our preferred option for express services, but placement of the on-ramp to enter on the left side of SR 99 will require buses to weave across traffic before making their first northbound stop. To use the Denny Street ramps, both northbound and southbound bus stops must be located in the vicinity of Denny Way. Metro staff is available to help determine safe locations and design for these stops.

Local service will enter and exit at the Roy St. interchange. If it is found that the weaving movement for buses entering SR 99 northbound at Denny Way is unsafe or unreliable, express buses may need to use this interchange also. The at-grade design of this interchange under the lowered Aurora options will require buses to operate on a couplet using both Dexter and Sixth

downturn has reduced other funding sources King County currently relies on for providing transit service throughout King County.
Currently WSDOT is providing funding for King County on the S. Holgate Street to S. King Street Viaduct Replacement Project to provide additional transit service hours to help mitigate the effects of construction. This program is ongoing and regularly monitored to evaluate its effectiveness. For the Alaskan Way Viaduct Replacement Project, WSDOT will continue to evaluate the need for increased bus service in the West Seattle, Ballard, Uptown, and Aurora Avenue corridors during the initial portions of the construction period, as well as a bus travel time monitoring system.

WSDOT will prepare a traffic management plan, which will contain localized traffic mitigation measures. These measures will be developed as construction details are refined. Please see the Final EIS, Appendix C, Chapter 6 of the Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

L-013-007

The lead agencies note and acknowledge King County's preference for the shorter construction period associated with the project's construction plan analyzed in the 2006 Supplemental Draft EIS. Please see the Final EIS for updated construction sequencing.

L-013-008

Specific construction transportation planning measures, including coordination with other projects in the region, will continue to be developed as the project construction timeline evolves. The South Park Bridge is currently closed. However, funding has been obtained to replace the existing bridge. The County plans to go to bid in early 2011 with an anticipated completion in late 2013.

A traveler information system is proposed that would help direct drivers

L-013-012 Avenues N. This will add more transit travel time as stated in the SDEIS. Transit priority treatments will likely be required on these streets to minimize delay. Since passengers will need to access transit on alternative sides of SR 99, they will need to cross the facility in one direction of each round trip. Pedestrian connections across SR 99 and into both the Seattle Center and South Lake Union will be critical to making transit effective in the area.

Specific Comments on SDEIS:

L-013-013 1. *Chapter 5, Question 18*
The parking mitigation strategy in the FEIS should include measures for reducing parking demand, in addition to measures for changing supply. Measures for reducing demand for parking include changing parking fee levels, changing fee structures, prioritizing parking for carpools and vanpools and measures for encouraging the use of other alternative modes. An effort should be made to quantify the impacts of demand-side measures on the level of parking demand. When evaluating the need for additional parking supply, the parking mitigation strategy should assume that demand-management strategies will be in effect.

L-013-014 2. *Chapter 7, Question 3*
It is unclear whether these shifts in behavior were quantified and incorporated in the analysis of traffic impacts. The FEIS should more clearly identify and explain these relationships. The report should also discuss the possibility of maintaining these shifts into the post-construction period.

L-013-015 3. *Chapter 7, Question 3*
The strategies included under the heading "Enhance Traveler Information" should incorporate information about these alternate routes. As an additional measure, the project partners should consider installing signage to inform drivers about the location of alternate routes. When designating alternate routes for automobile traffic, effects on transit service should be explicitly evaluated. Detrimental impacts on transit speed and reliability should be minimized through measures identified in King County Metro's "Transit Blueprint" plan.

L-013-016 4. *Chapter 7, Question 7*
The FEIS and Construction Transportation Management Plan should indicate that strategies (both additional strategies and strategies from the list of 31 included in the DEIS) will be evaluated and prioritized to ensure that funds are devoted to TDM programs that have potential to spur the largest non-SOV mode shift. Common criteria for prioritization include but are not limited to (not in order of importance):

- Practicality to implement
- Number of people or trips impacted
- Efficiency (number of dollars spent per shifted trip)
- Administrative oversight required

The final Construction Transportation Management Plan (CTMP) should include a plan for funding the key strategies. The funding plan should include the total amount of funding available and the amount to be spent on each strategy included in the plan.

to alternate routes during project construction. Additional information about the South Park Bridge could be incorporated into the system.

L-013-009

The Final EIS provides travel time tables that show the anticipated effect of construction activities on transit corridors. The travel times presented in the Final EIS are for the stage of construction that is expected to have the most extensive delays. The results indicated small changes in travel times between the baseline and construction conditions. For transit travel between West Seattle and downtown Seattle, buses will have travel time benefits with the provision of a northbound bus-only shoulder lane on SR 99 that will be available when project construction starts.

L-013-010

The Washington Department of Transportation, the City of Seattle, and King County Metro have developed a mitigation program to address construction impacts. The program elements include ITS development along major streets, including First Avenue S. More localized mitigation measures will be developed as construction details are refined. Also, a construction traffic management plan will be prepared to ensure that construction effects on local streets, property owners, and businesses are minimized.

L-013-011

Construction of the Spokane Street widening is underway and is anticipated to be complete by the time construction starts for the preferred Bored Tunnel Alternative. The Spokane Street Viaduct project will include a Fourth Avenue off-ramp for traffic from West Seattle. The Lander Street project is currently on hold. However, the Alaskan Way Viaduct Replacement Project includes the provision of a northbound bus-only shoulder lane on SR 99 between S. Holgate Street and past S. Royal Brougham Way.

Attachment 1
Page 3

L-013-017

5. *Chapter 7, Question 17*
The final CTMP should include a component geared toward construction worker transportation. Transit, carpools or vanpools may be viable options for many of these construction trips, reducing the need for 2,000 construction worker parking spaces. In addition to the possibility of having construction crews park in remote lots and reach the worksite via shuttle, the FEIS and Construction Transportation Management Plan should include strategies for moving construction-related trips to these alternate modes. Strategies could include:

- Employer-provided secure on-site storage for tools and equipment
- Employer-provided transit passes
- Personalized trip planning for construction workers
- Origin/end van share programs to transport workers from transit hubs to and from the worksite.

L-013-012

WSDOT, the City of Seattle, and King County Metro have developed a mitigation program to address construction effects. This program includes expanded public transit service along the affected corridor. More localized mitigation measures will be developed as construction details are refined. Also, a construction traffic management plan will be prepared to ensure that construction effects on local streets, property owners, and businesses are minimized.

WSDOT will prepare a traffic management plan, which will contain localized traffic mitigation measures. These measures will be developed as construction details are refined. Please see the Final EIS, Appendix C, Chapter 6 of the Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

In the north portal area, improved access to and from SR 99 near the north portal and added network redundancy across SR 99 would result in reduced congestion before and after Seattle Center events. These roadway changes would likely improve circulation and reduce overall congestion levels at critical intersections near the Seattle Center during large events by providing more direct access to regional facilities such as SR 99 and I-5. A detailed traffic analysis has been conducted for all alternatives and is described in this Final EIS. Please refer to Appendix C, Transportation Discipline Report, for additional detailed analysis of impacts to transportation elements, including transit.

L-013-013

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number

of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated $30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide frequent parking updates
- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

L-013-014

Impacts to traffic during major construction activities for the each build alternative have been analyzed as part of the Transportation Discipline Report (TDR) for the Final EIS. Traffic management approaches (detours), mitigation measures, and expected performance associated with major construction stages are discussed in the TDR (Appendix C of the Final EIS).

L-013-015

One of the main benefits of the Bored Tunnel Alternative is the ability to maintain operations on SR 99 throughout the construction period. Current construction plans call for a relatively short (several-week) closure during the end of construction to connect the tunnel with the remainder of SR 99. A discussion of the construction effects on transportation facilities and services is provided in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report. Also included in Chapter 6 is a listing of the planned construction mitigation activities. Included in this list are advance traveler information systems to warn vehicles of construction activities and provide information regarding alternative routes.

L-013-016

As part of the Bored Tunnel project and related projects, WSDOT and partner agencies have or will implement several strategies to keep traffic moving during construction. For example, both the south and north portal configurations include bus priority lanes to provide reliable travel times for SR 99 transit service into and out of downtown. The streets that transition between SR 99 and the downtown street grid are designed in a manner that meets the city's Complete Street goals and include treatments for pedestrians, bicycles, freight, and adjacent land uses. WSDOT will prepare a traffic management plan, which will contain localized traffic mitigation measures. These measures will be developed as construction details are refined. Please see the Final EIS, Appendix C, Chapter 6 of the Transportation Discipline Report as well as the Final EIS, Chapter 8 Mitigation.

L-013-017

The transportation planning process for construction encourages construction workers to use alternatives to the single-occupant vehicle to access the job site in order to minimize traffic congestion during peak travel periods. The Transportation Discipline Report (Appendix C of the

Final EIS) includes strategies targeted specifically to construction workers. Construction transportation management strategies will continue to evolve as the project construction plans become more definite.