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September 21,2006

TO: WSDOT Alaskan Way Viaduct/Seawall Project, 999 third Avenue, Suite 2424, Seattle, WA 98104

RE: Comments on the SR 99 Replacement SDEIS

From: Virginia and George Gunby, 2540 NE 90th St. Seattle, WA 98115-E-mail-vgunby@aol.com

Overall Comments:

I-596-001

- WSDOT has been patient and thorough in its preparation of the Supplemental Alaskan Way (AWV) Viaduct DEIS, and also responsive to the many creative non-SDEIS "solutions" which have been proposed. We support the cut-and-cover option for SR 99 replacement, because it is a **quadruple winner**, and our Preferred Alternative. A cut-and-cover tunnel/highway has a longer usable life, even if it is initially the most costly. Its life-costs are less than other alternatives. Not replacing it with the cut-and-cover design is not an acceptable option. It includes replacing part of the needed for the 73-year old deteriorating seawall as part of the project and will upgrade old, city waterfront utilities. It would remove a 50+year blight between our city and the waterfront. . As natives of Seattle who have been lived here most of our lives we have been impacted by the current unsafe facility, the visual ugliness, noise, the dirt and water that we hear and feel when we are on or under it. Today we avoid driving on the present earthquake-damaged SR 99 elevated structure, and we urge you not to delay moving ahead on the design of this project.

I-596-002

- Nine state Legislators from Seattle (9/18/06) have written an excellent letter to the Governor of their support for the tunnel option, stating in part that *"only the tunnel provides an offsetting tax benefit to the citizens of Seattle and the State of Washington."* The state created an experienced Expert Review Panel and on 8/31/06 confirmed that it was technically feasible and fundable. Glenn Pascall's economic study of the "Comprehensive Assessment of (SR 99 cut-and-cover replacement) Benefits", 8/16/06, has evaluated and confirmed the increased property values to support an Local Improvement District (LID), and the projected increases in public and private revenues and long-term benefits. The design and delivery of this project is a critical 21st century decision for Seattle, and these recent events have improved the future prospects for this option. Integrating the planning with potential tolling, TDM, and a systemic look at how to reduce the overall trips and the construction costs, with more detailed design information, will be important next steps in the implementation of this project. We believe that costs and size can be reduced through additional design and the effective use of transportation management tools, which have not been considered in the DEIS.

I-596-003

Our Example Least-Cost Planning-The southbound on-ramp, from Western or Elliott, at the north end, by the exit of the Battery Street tunnel could be done differently. WSDOT could have a stoplight to safely meter autos and reducing the speed limit in the tunnel onto the southbound lanes, could be a substitute for adding a third lane in each direction for the entire facility.

I-596-004

- The September 20, 2006 updates of the estimated costs of the cut-and-cover option are sobering and demonstrate the need for new creative ways to reduce the costs. We urge WSDOT and the city to move expeditiously on the planning, preliminary engineering costs estimates the Alaskan Way Viaduct (AWV). When you perform value-engineering" and "risk analysis" during the design and engineering stages, and seek to reduce the escalation of costs, we urge you to *consider a 4-lane option, no net increase in the existing capacity. With dynamic tolling and a Corridor Management Plan and Contract, explained laterin our comments, the 6-lane option is over-building the project, particularly since no Transit/HOV lanes are planned.*

- The 4-lane option with standard shoulders and lanes would be safer than the existing narrow lanes and shoulders and have the 110,000-car capacity of today, rather than the up to 135,000 vehicles per-day, estimated in the 6 lane SDEIS. As a compromise, and a much needed less expensive AWV option, we support a "GREEN" 4-lane option, including a one-mile, 4-lane cut and cover SR 99 highway from King Street to Pine Street. WSDOT and Seattle traffic engineers, and the Expert Review Panel members should advise you on the differences in the safety, capacity and costs of the current 6-lane SR99 corridor, compared with a new 4-lane project, with wider lanes shoulders, that meet new standards. The SR 99 corridor will use the rebuilt 4-lane (2/2) Battery Street Tunnel and no unsafe last minute northbound entrance ramp

I-596-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2006 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2006, please refer to the Final EIS for current information.

I-596-002

We acknowledge that a tunnel alternative has the potential to significantly increase public and private revenue. The Final EIS will include qualitative economic analysis of the preferred Bored Tunnel Alternative to more fully describe the project's indirect benefits. However, quantitative estimates of indirect benefits are beyond the scope of project-related analysis.

We agree with your emphasis on integrating transportation demand management (TDM), and cost reduction with project planning. TDM has been an integral part of the project's planning and design. For example the Project Transportation Team, consisting of representatives of the three lead agencies and project team staff, was created to help coordinate and counsel on transportation planning and analysis for the project. Staff members from local and regional transportation agencies—including Sound Transit, King County Metro, the WSDOT Urban Corridors Office and Office of Transit Mobility, Washington State Ferries, City of Seattle, FHWA, and Community Transit—participated in this effort. As part of this effort, the TDM subcommittee was formed to support the Project Transportation Team, focusing on developing TDM strategies that will help enhance project related mobility.

Like TDM, the consideration of cost has been an integral part of project

I-596-004

into the tunnel and the least cost planning example sited above . *Please request that the Expert Review Panel (ERP) respond to the research they did on the capacity, safety and cost questions, with their comparisons of the propose, new 6-lane versus a 4-lane facility. When I informally discussed a 4-lane with some of the ERP members they were optimistic that a 4 lane would be a suitable alternative and would reduce costs.*

Four-lanes would also be consistent with the goal of the doubling of the ridership of transit in Seattle by 2030, and the reduction of the greenhouse gases from our #1 source, autos. Seattle is a leader in the U.S. in supporting efforts to meet the Kyoto protocol to reduce our carbon footprint. Global Warming and the reduction in the use of world oil resources and the increase in oil and gas prices, all argue for reducing the future size and scale by reducing 2 lanes of the project. The accelerated implementation in the use of dynamic "time of day" tolling, not HOT lanes, as part of a Metropolitan area tolling program for of the state highway system should be accelerated and would help reduce trips and manage the efficient use of this corridor. In fact we should institute tolling on SR 99 and SR 520 now, as a means to help the users pay for new construction.

I-596-005

- **Not included in the DEIS**, but also important is the need to prepare a long-term "Corridor Management Agreement and Plan" for the SR 99 corridor between WSDOT and with adjacent public agencies and the major employers, whose users/employees must use the AWV corridor. The goal is to achieve a sustainable corridor. We manage other scarce public services such as energy through financial incentives and WSDOT's staff have prepared Corridor Management plans for other state highway such as I-405 and SR 520 to manage and reduce the corridor's auto trips.) Developing a sustainable Corridor Plan, would start with using the "lessons learned" from the implementation of the city and WSDOT's Construction Mitigation Plan, and build on it. Regularly monitoring of the system' performance is needed to ensure that the overall corridor trips stay level, to meet performance objectives of the corridor. This oversight will ensure that the adjacent land uses, and future development and traffic counts and comprehensive oversight is consistent and compatible with WSDOT's SR 99 Corridor Management Agreement, and coordinated with the city of Seattle's Waterfront Plan. Monitoring will also indicate the clues to making changes needed for maintaining the trip reduction strategies and adjacent land uses and surface transit routes, bike and pedestrian paths to support and to reinforce a healthy, pedestrian-friendly Waterfront community as well as a sustainable SR 99 corridor. State highways need to implement concurrency fee plan to gain funding for their facilities, and not be exempt from this GMA transportation funding technique.

The Viaduct replacement must be a positive contribution to revitalizing the city waterfront and region and to increasing the region's advantage as an international economically successful and competitive seaport.

I-596-006

1. **Is the south end of the Viaduct from Spokane Street north bisecting the rail yards damaged to the point that it also needs immediate replacement now? Or can it be "Phased" into segments, to complete when more funds from tolls or other revenue are available?**

I-596-007

2. **Could the first Phase of SR 99 begin with the section from north from the SR 99 connection with SR 519 to the Battery Street tunnel, to replace the most earthquake-damaged area?**

I-596-008

The conflicts between Seattle and the Port over new freight connection/access from the south part of SR 99 onto SR 519 connecting with I-5 or I-90 need to be resolved. The benefits of the rebuilt SR 99 to the Port need to be calculated. If they are higher than the $200 million they have said they will contribute, they should be asked to pay more of the share of the project. The section the Port needs could be built with their funds now so that freight trucks can use the new interchange connector from SR 99 to access SR 519. If the south section were delayed, and this interchange could be built early in the construction schedule, this project could help to mitigate problems caused during the later construction of the northern segment of SR 99, for a number of other corridors. Assisting the freight train yards and movement of all freight to and from our seaport should be done too, but isn't as critical.

planning and design, and evaluation of alternatives will continue to focus on demonstrating cost-effectiveness.

The Final EIS considers tolling for all the proposed build alternatives.

I-596-003

Thank you for your comment. The Western and Elliott Avenue ramps will be removed for the Bored Tunnel Alternative. For the Elevated and Cut-and-Cover Alternatives, three lanes are proposed in each direction south of the Elliott Avenue on-ramp in order to safely accommodate the expected future traffic forecasted for the design year of 2030. Similar to today, approximately 20 to 25 percent of all southbound traffic traveling along the viaduct enters the corridor at the southbound Elliott on-ramp. Three travel lanes are needed to accommodate the traffic coming from the Battery Street Tunnel as well as those entering the corridor via the southbound Elliott on-ramp.

I-596-004

The Bored Tunnel Alternative, selected by the lead agencies as the preferred alternative, is a four-lane option.

I-596-005

Strictly speaking, corridor management plans are required only for scenic byway designation. In this context, a Corridor Management Plan is not needed for the SR 99 corridor. The intent of your comment appears more aimed at ensuring other improvements and surrounding development remain compatible and consistent with this project. Much of this responsibility falls to the City of Seattle. Coordination and monitoring of conditions within the corridor will occur throughout project construction as part of construction and mitigation plans. WSDOT is not able to impose concurrency fees under current regulations.

I-596-009

- The state appointed Expert Review Panel, created by the 2006 Legislature, recently reported that there is adequate committed and future funding available to pay for and build either the cut-and-cover tunnel option or the elevated project. They also wrote that it is technically feasible, and urged the city to make a timely decision and move on to reduce the costs and schedule delays. Now the updated cost figures by the WSDOT reveal possible another billion in costs for this alternative. This information should be an incentive to evaluate carefully how to reduce the construction costs and get moving with a lower cost the project.

I-596-010

- Our city is now a larger regional/metropolitan center and international seaport. Our waterfront's seaport economy has its physical needs have changed. The introduction of containers, initiated the need for large container storage areas, and rail and truck access to freight loading in concentrated locations, that have large cranes for loading larger and larger ships. The benefits to our city, to build the cut-and-cover alternative, will revitalize the character of our waterfront adjacent to our large, central city and will change it into a pleasant attractive, pedestrian-friendly place, providing a promenade, with access to the water, mountain and sunset views. We finally have a chance to have a well-planned, appropriate highway corridor, that is integrated with the adjacent land uses, the trolley, pedestrian walkways, bike paths, commercial businesses, the ferries, tourist facilities and restaurants as suggested in the proposed draft of the Seattle Waterfront Plan. We are so close!

I-596-011

- A successful WSDOT SR 99 Construction Mitigation Plan, that includes using subsidizing transit to help users make their journeys to work and home is critical for our city to thrive while living through the years of AWV construction. Oversee its management well, with the city of Seattle, to make sure that it helps to deliver a successful on-time and within-budget project. After observing the Seattle AWV "rehearsal" with the closing of 3rd avenue for the Bus Tunnel modifications, we are optimistic that with a good communication system to the users/stakeholders is critical to a well-thought out mitigation strategy and can speed the construction time without disrupting the city.

I-596-012

- The independent Seattle Planning Commission members who are very familiar with Seattle's future and development questions discussed and spent a lot of time reviewing the AWV-SR 99 alternatives. They support the cut-and-cover option, as the Preferred Alternative for the city. They agreed that there will be many positive long-term impacts that the underground Alaskan Way segment of the corridor will have on our people, and the future character and success of our great regional city. We again urge WSDOT and the Governor to Go for the "green" 4-lane option Alaskan Way, with a one-mile cut and cover tunnel!

Additional Reasons for building this Cut-and Cover SR 99 Alternative:

1. Some Seattle City Council members are stating that the large elevated structure is inconsistent with the city of Seattle's adopted comprehensive plan and would be denied a Shoreline permit and many other needed permits to be built. The tunnel option desired by the Seattle Mayor and most of the Council members is consistent with the GMA, the Shoreline Act.
2. It replaces the earthquake-damaged viaduct, with a critical Seattle North/South state corridor and there will be less a negative impacts from noise and dirt than with an ugly elevated option. It would also upgrade the surface level lanes.
3. Depending on the closure and phasing policies adopted, it generally will take less time to build than the elevated option.
4. Enhances the waterfront for people to enjoy and improves the environment for the marine habitat.
5. Regular quarterly evaluation and risk analysis by the independent Expert Review Panel could reduce the likelihood of cost overruns for this mega-project. To protect all of the partners, WSDOT needs an agreement with all of the AWV project-funders, to proportionately share any cost over-runs, if they occur.
6. There is no money to fund the tearing down of the existing SR 99 or to replace the seawall. No feabile plans have been shown to pay for or to mitigate the existing 110,000 vehicles per day using this north/south corridor with existing streets and transit, as supported by the People's

I-596-006

The approaches and interchanges on the south end of the project corridor are integral to the structure, function, and construction process of the project and cannot be phased.

I-596-007

The construction approaches discussed in the 2006 Supplemental Draft EIS have been updated. An additional construction plan was also evaluated for the Bored Tunnel Alternative in the 2010 Supplemental Draft EIS. Details about the Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure construction plans are presented in Chapters 3 and 6 of the Final EIS and Appendix B, Alternatives Description and Construction Methods Discipline Report.

I-596-008

Thank you for your comment. To determine the design of the stadium interchange, the project team has been working with lead agencies including the City of Seattle and the Port of Seattle, along with representatives from the freight community, the Mariners, and the Seahawks. The proposed Stadium Area design can be found in Appendix C, Transportation Discipline Report, of the Final EIS. Ramp options in the stadium area are extremely limited due in part to the railroad tracks (i.e., SIG yard) just south of Massachusetts Street. Also, the need to serve the largest generators effectively (Port of Seattle, Safeco Field, Qwest Field, etc.) was a significant factor in determining where to place the ramps.

I-596-009

WSDOT and the other lead agencies are working to reduce the cost of the project while still providing good value for the public. The higher cost estimate is largely due to higher inflation in major construction than in the other sectors of the economy.

I-596-012

Waterfront Coalition. If the choice is between the Elevated and the No-build options, we would very reluctantly select the No-build as our second choice, if funding is limited for only to the elevated SR 99 option.

7. Even though the columns on the proposed elevated alternative are spaced wider apart, the elevated roadway would be 50% wider and the columns would be 100% larger. The higher, solid side rails of the roadway would block the views from the viaduct of Puget Sound and other scenery. It should not be an option
8. Both proposed SR 99 options would connect with SR 509 a major north/south truck- freight corridor from and to I 5 South near Tukwila, if it is extended with RTID funds.
9. The "tunnel" alternative opens up new economic opportunities on the waterfront as a more inviting tourist destination, and would increase property values, and therefore the city and state annual collection of sales and property taxes.
10. Any option selected for the Waterfront should be a public tool used to implement the planned for long-term waterfront development goals. Remember a transportation facility is not an end in itself. Therefore we urge that it be designed to improve the quality of life and livability of Seattle and help to jointly meet the city and state's growth management policies and goals and the needs of future generations. We need to build if right, or tear it down and manage to live without it!

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Thanks you for the excellent, succinct and clearly written and presented SDEIS on the SR 99 plans and future alternatives. It meets SEPA and NEPA guidelines very well, just as did your first award winning 2004 AWV DEIS. We urge you to work to expedite the funding issues and the decision-making, and include involvement and communication with the public about your progress and problems, so that this project is built as soon as possible.

cc: Mayor Gregory Nickels

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I-596-010

The Alaskan Way Viaduct Replacement Project is coordinating with the City of Seattle's waterfront planning efforts. If the viaduct was replaced by a tunnel, large areas of open space would become available. This new space could be converted into a variety of new uses like a waterfront promenade, bike and pedestrian paths, and expanded streetcar service. Also, if the viaduct is removed, scenic views to, from, and along the waterfront would be opened up, making the waterfront more attractive visually, and making the it seem more connected to downtown, Pioneer Square, Pike Place Market, and Belltown.

I-596-011

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. Also included in Chapter 6 is a listing of the planned construction mitigation activities.

I-596-012

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