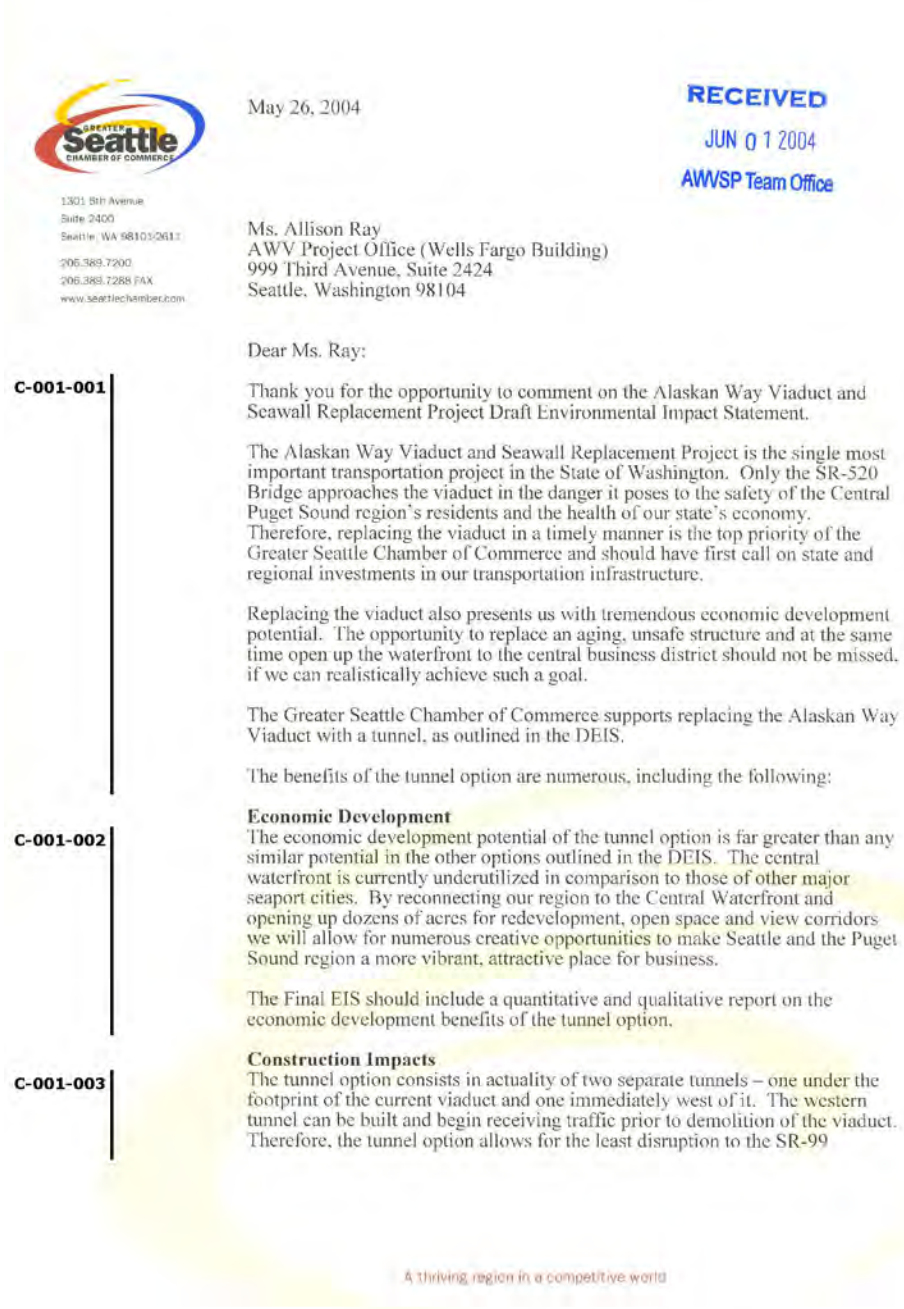

Greater Seattle Chamber of Commerce

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May 26, 2004

RECEIVED
JUN 01 2004
AWVSP Team Office

Ms. Allison Ray
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, Washington 98104

Dear Ms. Ray:

C-001-001

Thank you for the opportunity to comment on the Alaskan Way Viaduct and Seawall Replacement Project Draft Environmental Impact Statement.

The Alaskan Way Viaduct and Seawall Replacement Project is the single most important transportation project in the State of Washington. Only the SR-520 Bridge approaches the viaduct in the danger it poses to the safety of the Central Puget Sound region's residents and the health of our state's economy. Therefore, replacing the viaduct in a timely manner is the top priority of the Greater Seattle Chamber of Commerce and should have first call on state and regional investments in our transportation infrastructure.

Replacing the viaduct also presents us with tremendous economic development potential. The opportunity to replace an aging, unsafe structure and at the same time open up the waterfront to the central business district should not be missed, if we can realistically achieve such a goal.

The Greater Seattle Chamber of Commerce supports replacing the Alaskan Way Viaduct with a tunnel, as outlined in the DEIS.

The benefits of the tunnel option are numerous, including the following:

C-001-002

Economic Development
The economic development potential of the tunnel option is far greater than any similar potential in the other options outlined in the DEIS. The central waterfront is currently underutilized in comparison to those of other major seaport cities. By reconnecting our region to the Central Waterfront and opening up dozens of acres for redevelopment, open space and view corridors we will allow for numerous creative opportunities to make Seattle and the Puget Sound region a more vibrant, attractive place for business.

The Final EIS should include a quantitative and qualitative report on the economic development benefits of the tunnel option.

C-001-003

Construction Impacts
The tunnel option consists in actuality of two separate tunnels – one under the footprint of the current viaduct and one immediately west of it. The western tunnel can be built and begin receiving traffic prior to demolition of the viaduct. Therefore, the tunnel option allows for the least disruption to the SR-99

A thriving region in a competitive world

C-001-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 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 2004, please refer to the Final EIS for current information.

C-001-002

The Final EIS includes a qualitative economic analysis for all of the alternatives that more fully describes indirect benefits. Quantitative estimates of indirect benefits are not needed to understand the likely effects of the project in the context of the decision at hand.

C-001-003

The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each

C-001-003

corridor, and consequently to both the I-5 and I-405 corridors as well, during demolition of the viaduct and construction of the eastern tunnel. No other option in the DEIS allows for as little disruption to usage of our region's current transportation system.

C-001-004

Efficiencies with Seawall Construction
By combining replacement of a portion of the Seawall with the western wall of the tunnel, we can capitalize on efficiencies, getting both elements of the project for considerably less than it would cost to build a tunnel and a seawall independent of one another.

Support for the tunnel option is not unqualified, however. Among our concerns are the following:

C-001-005

Freight Mobility
The ability of industrial and manufacturing businesses to transport freight of all kinds between Ballard and the industrial areas south of downtown – as well as the ability to use the SR-99 corridor to move freight through Seattle to and from other parts of the region – must be preserved. Specifically, the ability to transport hazardous and flammable materials through any tunnel that is ultimately built must not diminish from current levels on the existing viaduct.

C-001-006

Funding
Any realistic option to replace the viaduct will cost at least $3.1 billion, with most of the alternatives studied in the EIS in the $3.2 billion to $3.5 billion range. Building a tunnel is estimated to cost $3.8 billion to $4.1 billion, representing an incremental change of between $300 million and $900 million. Innovative financing must be implemented to meet this incremental need. Capitalizing on the value that the removal of the Alaskan Way Viaduct will create throughout downtown Seattle must be a part of any funding plan for building a tunnel. Realistic options include a Local Improvement District or Tax Increment Financing (TIF), if TIF is ever allowed in the State of Washington.

C-001-007

Capacity
Losing capacity in the SR-99 corridor cannot be an option in the planning process. The 122,000 vehicle capacity in the tunnel and 21,000 vehicle capacity along Alaskan Way, as outlined in the DEIS, are both encouraging figures. This level of capacity must be maintained as the project is engineered and constructed.

C-001-008

Commitment to the Entire Project
Because the tunnel option is the most expensive among those explored in the DEIS, it runs the greatest risk of failing to be fully funded. The Chamber is concerned that work on northern or southern elements of the SR-99 corridor could be more expensive than anticipated, leaving too few resources to complete the tunnel. In such a situation, the risk exists that we will be left with the ability to only complete a surface option or a modified aerial structure, both of which are far inferior to a tunnel. Therefore it is vital that the southern portion of the corridor and the central waterfront portion be built concurrently as a single project, with a commitment to funding the entire project to completion.

alternative and its construction plan, and Chapter 6 describes construction effects.

C-001-004

Thank you for your consideration of how the seawall integrates with the alternatives. Since 2004, the project has evolved. Please see the Final EIS for current information on the alternatives. For the Cut-and-Cover Tunnel Alternative, constructing one wall that would serve as both the new seawall and west wall of the tunnel along the central waterfront could help to make the construction staging and costs of that piece of the project more efficient. For the preferred Bored Tunnel Alternative, the seawall would be a separate project. For the Elevated Structure Alternative, the seawall would need to be replaced as part of the project, because a new elevated structure on the existing alignment requires the geotechnical stabilization afforded by a new seawall.

C-001-005

Current access to and from SR 99 between Ballard and the industrial areas south of downtown would change under the preferred Bored Tunnel Alternative. This alternative would remove connections via the Elliott and Western Avenue on- and off-ramps. Freight operators traveling from Ballard, Interbay, and Magnolia could make their trip by either (1) traveling on Elliott Avenue and Alaskan Way (via Broad Street) to SR 99 ramps at Alaskan Way S., or (2) traveling on Mercer Street to the SR 99 ramp at Sixth Avenue N. and Republican Street.

This project recognizes the importance of preserving routes for the transport of hazardous and flammable materials. Please note that transport of these materials through the Battery Street Tunnel is currently prohibited. Additionally, transport of these materials on the Viaduct is prohibited during peak commute periods. Alternate routes are provided on Alaskan Way and on I-5.

Security

C-001-009 Because the western wall of the tunnel will also serve as the seawall, the seawall will appear to be more vulnerable to acts of malice than was previously the case. Such acts could therefore put the central business district in jeopardy of a seawall collapse. Preventative measures must be taken in order to secure the safety of everyone in the waterfront area and throughout the core business district.

North Terminus

C-001-010 The DEIS identifies three options for improving the East-West connections immediately North of the Battery Street Tunnel. If the incremental costs of this alternative can be covered by sources outside of the Viaduct project the lowered Aurora alternative appears to be the superior choice. This alternative provides the best opportunity for reconnecting the street grid, thereby knitting back together the South Lake Union and Lower Queen Anne neighborhoods and improving traffic flow on the Mercer corridor, without disrupting the flow of traffic on the Alaska Way Viaduct.

The Greater Seattle Chamber of Commerce will monitor progress on this vital transportation project and reserves the right to further comment or change its position as events unfold.

Again, thank you for the opportunity to comment on this important Draft EIS. The Chamber looks forward to working with the project proponents to improve this vital transportation corridor.

Sincerely,

Steve Leahy
President & CEO

While the ventilation system for the Bored Tunnel Alternative is being designed for a fire with a heat release rate of approximately 100 MW (a category of fire typically associated with a 4,000-gallon tanker truck with hydrocarbon fuel), flammable and hazardous materials will be prohibited in the new tunnel. This cargo would have to use one of the alternate routes identified above, just as they do today if they would otherwise travel through the Battery Street Tunnel or during peak periods.

C-001-006

WSDOT has authorization from the state legislature for $2.8 billion to replace the Alaskan Way Viaduct. This does not involve or require a local improvement district or tax increment financing. The City of Seattle is leading improvements to the Central Waterfront, including Alaskan Way. The City may consider a variety of funding mechanisms for these improvement.

C-001-007

The alternatives considered in the Final EIS provide sufficient vehicle capacity in the project corridor. The Final EIS and Appendix C, Transportation Discipline Report, provide updated transportation information for each alternative.

C-001-008

All components of the preferred Bored Tunnel Alternative are fully funded by federal, state, and local sources. The state legislature has not addressed funding for either the Cut-and-Cover Tunnel or the Elevated Structure Alternatives. Cost estimates for the alternatives evaluated in the Final EIS are:

- Bored Tunnel – $1.96 billion
- Cut-and-Cover Tunnel – $3.0 to $3.6 billion
- Elevated Structure – $1.9 to $2.4 billion

These cost estimates do include different elements. The Bored Tunnel Alternative cost does not include replacing the seawall, improving the Alaskan Way surface street, or building a streetcar. Costs for the Cut-and Cover Tunnel and Elevated Structure Alternatives do not include replacing the seawall between Union and Broad Streets.

C-001-009

For the Cut-and-Cover Tunnel Alternative, appropriate security and safety measures would be used to ensure the safety of the waterfront. With the preferred Bored Tunnel Alternative, the seawall would be a separate project led by the City of Seattle. Security measures for the Bored Tunnel Alternative have been discussed and design considerations have been evaluated.

C-001-010

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments. After the 2004 Draft EIS was published, your comments along with others led to additional planning, analysis, and the revised alternatives presented in the 2006 Supplemental Draft EIS. Following publication of the 2006 Supplemental Draft EIS, there was not a consensus on how to replace the viaduct along the central waterfront. In March 2007, Governor Gregoire, former King County Executive Sims, and former City of Seattle Mayor Nickels initiated a public process called the Partnership Process to develop a solution for replacing the viaduct along the central waterfront. Details about the project history are described in Chapter 2 of the Final EIS. Because the project has evolved since comments were submitted in 2004, please refer to this Final EIS for the current information.

In January 2009, Governor Gregoire, former King County Executive Sims, and former Seattle Mayor Nickels recommended replacing the

central waterfront portion of the Alaskan Way Viaduct with a single, large-diameter bored tunnel. After the recommendation was made, the Bored Tunnel Alternative was analyzed and compared to the Viaduct Closed (No Build Alternative), Cut-and-Cover Tunnel, and Elevated Structure Alternatives in the 2010 Supplemental Draft EIS. The comments received on the 2004 Draft and 2006 Supplemental Draft EISs, subsequent Partnership Process, and the analysis presented in the 2010 Supplemental Draft EIS led to the lead agencies' decision to identify the Bored Tunnel Alternative as the preferred alternative for replacing the viaduct along the central waterfront. None of the three alternatives included in the Final EIS include the lowered Aurora concept. However, John, Thomas, and Harrison Streets would connect across Aurora Avenue with the Bored Tunnel Alternative and improve the neighborhood connections.