From: Jordan Lock [jordalexlock@gmail.com]
Sent: Tuesday, November 16, 2010 3:48 PM
To: AWV SDEIS Comments
Subject: I oppose the deep bore tunnel viaduct replacement

Dear WSDOT,

I-099-001 I am writing to express my deep concern and opposition to the proposed deep bore tunnel to replace the existing viaduct for state 99. For the state of Washington to undertake such a massive infrastructural project, a tunnel at an unprecedented scale under historic Seattle buildings, I believe the risk and expense far outweighs the supposed benefits of an exit-less tunnel that bypasses downtown. Am I correct in my understanding that the current draft of the Environmental Impact Statement doesn't include the toll charges expected effect on the tunnel's use with increased traffic diverted to city streets? It seems like a dreadful oversight to draft an environmental impact statement without taking the anticipated 'real life' conditions into account. I am concerned that this deep bore tunneling solution has been too quickly adopted by the various departments of transportation and levels of government without more thoroughly exploring a surface/transit option, one that would undoubtedly be less expensive and would move Seattle and the state in, what I believe, would be a more ecologically responsible direction. With the anticipated tolling of the tunnel likely pushing a large percentage of 99's traffic onto Seattle's downtown streets, a comprehensive surface transportation plan will need to be implemented regardless; I feel the current tunnel plan does not adequately examine this component of its proposal and an entirely surface proposal with supplemental transit has been largely ignored/unexplored.

I-099-002

I-099-003 In addition, for the current proposal to place the burden of any possible cost overruns on Seattle residents/property owners without the public ever voting on the deep bore tunnel (the most expensive of all possible options), which is a **state** highway, is highly objectionable. City residents should not be financially responsible for cost overruns of a state highway, particularly when there is significant opposition amongst Seattle residents.

I ask that you please take the following steps before moving forward.

I-099-004 1. draft a thorough plan for a surface/transit option to replace the existing viaduct with an accompanying Environmental Impact Statement.

I-099-005 2. re-draft the Environmental Impact Statement for the proposed deep bore tunnel that realistically reflects the anticipated use of the tunnel with expected tolls in place.

I-099-006 3. ensure access to Seattle's downtown in any proposed option (likely with increased transit)

I-099-007 4. show how the state will pay for each option, including all construction cost overruns and waterfront/surface rehabilitation.

I-099-008 5. show how Seattle's historic buildings and districts (Pioneer Square) will be protected.

I-099-009 I understand that there is concern for the existing viaduct's structural integrity and its removal would be a part of either option (tunnel or surface/transit). Using the existing viaduct's current condition is no excuse for not doing due diligence toward drafting a more realistic Environmental Impact Statement for the deep bore tunnel based on anticipated use (with tolls in place) and a thorough exploration of a surface/transit option.

I-099-001

Currently, the Washington State Department of Transportation does not have the authority from the Washington State Legislature to toll State Route 99 (SR 99). As legislative action is required to toll this facility, the evaluation of the non-tolled Bored Tunnel Alternative in the 2010 Supplemental Draft EIS accurately reflected the status of the project; note, however, that Chapter 9 does discuss tolling effects. If the Washington State Legislature decides to use tolling to fund a portion of the project, the potential effects of tolling do need to be evaluated and documented. The possible effects of tolling are analyzed in this Final EIS. Please see Chapter 5 and Appendix C, Transportation Discipline Report.

I-099-002

The analyses regarding how tolls might be implemented as part of the proposed action were preliminary for the 2010 Supplemental Draft EIS but have been updated for the Final EIS. They will be further refined during final design through a joint planning effort (described below) should the state legislature authorize tolls on the SR 99 Bored Tunnel. The analysis in the Final EIS represents a conservative estimate of the impacts of tolling the SR 99 Bored Tunnel. We anticipate that any effects due to applying tolls to the SR 99 Bored Tunnel will be notably less than those described in the Final EIS analysis.

Prior to a final decision about how the SR 99 Bored Tunnel would be tolled, the Washington State Department of Transportation will be working with the Seattle Department of Transportation and other agencies to refine and optimize how to toll the SR 99 tunnel while minimizing diversion of traffic to city streets and minimizing potential effects to transit, bicycle, and pedestrian travel. WSDOT, with cooperation from the City of Seattle, the Port of Seattle, and King County, will establish a Tolling Advisory Committee to provide strategies for minimizing diversion impacts.

I-099-010 The public vote that took place regarding the replacement of the existing viaduct voted down proposals for a reconstructed elevated highway as well as the "cover"-style tunnel proposal. In such tempestuous economic times, the public and the government needs to explore all possible options and select an option that makes the most economic and environmental sense. I personally believe that the currently proposed deep bore tunnel is the furthest from being most economical or most environmental and if put to a public vote I believe a majority of Washington and Seattle residents would agree.

Thank you,

Jordan Lock
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As part of the Bored Tunnel project and related projects, WSDOT and partner agencies have or will implement several strategies that should reduce the effects of potential diversion. 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.

In advance of construction, WSDOT funded Intelligent Transportation System (ITS) investments that provide improved signal operations and travel time information on SR 99 and city streets such as 15th Avenue NW that were likely to see increased volumes due to SR 99 construction activities. These investments will have lasting value. Supplemental transit services and transportation demand management were also implemented with assistance from the City of Seattle and King County, and these strategies can form the blueprint for future strategies.

Chapter 2, Alternatives Development, of the Final EIS describes the project's history and alternatives evaluated prior to the 2010 Supplemental Draft EIS. The 2004 Draft EIS included evaluation of the Surface Alternative. This alternative was eliminated because it reduced roadway capacity and didn't meet the project's purpose as identified in the 2004 Draft EIS.

I-099-003

The bored tunnel cost estimate is based on WSDOT's Cost Estimate Validation Process for large projects, which was developed in 2002. This process uses outside experts to help establish a more comprehensive budget at the early stages of a project and identify risks that need to be actively managed. It takes into account project changes, mitigation,

inflation and risk - something projects that experience cost overruns generally fail to do.

Independent experts and cost estimators experienced in tunnels, underground construction, and megaproject delivery have reviewed the bored tunnel cost estimate. The viaduct replacement project also has a technical advisory team with more than 295 years of collective experience delivering projects around the world that provides guidance on risk management, construction methods, and oversight.

To better understand the conditions we would encounter during construction, crews have conducted more than 100 borings for soil samples, some up to 300 feet deep, and more than 300 surveys of buildings and other structures along the tunnel route. This information, along with the other analysis completed, also helps to identify and manage risk.

The legislation authorizing WSDOT to proceed with the project obligates two billion eight hundred million dollars. Although the legislation also has a provision that those in Seattle who benefit from the project should be responsible for cost overruns. WSDOT interprets this as a statement of legislative intent that would need clarification to become operative.

I-099-004

Because there has been continued interest in a surface and transit hybrid option, the lead agencies evaluated the transportation effects of such an alternative in the 2010 Supplemental Draft EIS. Attachment A to the 2010 Supplemental Draft EIS and Final EIS Appendix W, Screening Reports, contain all the results from the transportation analysis for the surface and hybrid concept. One of the findings is that the surface and transit hybrid option would increase travel times for all but one trip modeled during the AM peak hour and for most trips during the PM peak hour as compared to proposed build alternatives. Chapter 2 of the Final

EIS describes the history of the project, environmental documentation, and alternatives development process.

I-099-005

Chapter 9 in the 2010 Supplemental Draft EIS discussed the possibility of tolling and effects if tolls were applied to the Bored Tunnel Alternative. In addition, a detailed tolling analysis has been conducted for all alternatives and is presented in this Final EIS. Please refer to Appendix C, Transportation Discipline Report, for additional detailed analysis of tolling impacts to transportation elements.

I-099-006

Under the Bored Tunnel Alternative the function of the downtown ramps at Columbia and Seneca Street will be replaced by new ramps to Alaskan Way at King Street. Traffic analysis indicates that this arrangement will result in comparable or better overall traffic distribution and flow than is experienced with the current Columbia and Seneca Street ramps. This is because the current ramps concentrate traffic to a single, congested location in the central downtown. The relocated ramps would instead allow drivers to diffuse through the street grid using many different paths.

I-099-007

The state legislature authorized funding to replace the Alaskan Way Viaduct in RCW 47.01.402. According to this law;

"The legislature finds that the replacement of the vulnerable state route number 99 Alaskan Way viaduct is a matter of urgency for the safety of Washington’s traveling public and the needs of the transportation system in central Puget Sound."

This legislation also authorizes WSDOT to obligate two billion eight

hundred million dollars. In order to fund this obligation the legislation further identifies sources of funding: $2,400,000,000 of state funding; $400,000,000 of toll funding.

In the absence of toll funding WSDOT would still have the authorization to issue contracts up to $2,800,000,000 but the mix of funding sources would change. It is assumed that the toll funding would be replaced by new or reprioritized federal, state, or local funding sources.

The legislation authorizing WSDOT to proceed with the project also has a provision that those in Seattle who benefit from the project should be responsible for cost overruns. WSDOT interprets this as a statement of legislative intent that would need clarification to become operative.

I-099-008

Appendix I, Historic, Cultural and Archaeological Discipline Report, of the Final EIS discusses protection of historic buildings and districts. Buildings and structures (both historic and non-historic) along the alignment have been inspected and evaluated by structural engineers. The construction process includes extensive monitoring of each building and structure before, during and after tunneling. This will enable any settlement impacts to be detected immediately so that they can be prevented or minimized. If damage does occur to historic buildings, it will be repaired according to the Secretary of the Interior's Standards for Rehabilitation of Historic Properties.

I-099-009

Environmental documentation for the project has been prepared in compliance with the National Environmental Policy Act (NEPA)(42 U.S.C. 4322(2)(c)) and the State Environmental Policy Act (SEPA)(Ch. 43.21 C RCW). The Final EIS Chapter 1, Introduction, includes the Purpose and Need and Chapter 2, Alternatives Development, describes the history of the project and alternatives development.

The alternatives considered in the Final EIS, in addition to the Viaduct Closed (No Build Alternative), are a four-lane bored tunnel, a six-lane elevated structure, and six-lane cut-and-cover tunnel. 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. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the other two alternatives. Extended closure of SR 99 would have severe adverse effects on Seattle and the Puget Sound region. Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS provides a more in-depth comparison of tradeoffs for the alternatives.

The analyses regarding how tolls might be implemented as part of the proposed action are preliminary in nature and will be further refined should the state legislature authorize tolls on the SR 99 Bored Tunnel. The potential effects resulting from these preliminary analyses represent the upper end or worst case scenario of implementing tolls on the SR 99 Bored Tunnel. We anticipate that any effects due to applying tolls to the SR 99 Bored Tunnel will be notably less than those described in the Final EIS analysis.Prior to a final decision about how the SR 99 Bored Tunnel would be tolled, the Washington State Department of Transportation will be working with the Seattle Department of Transportation and other agencies to refine and optimize how to toll the SR 99 tunnel while minimizing diversion of traffic to city streets and minimizing potential effects to transit, bicycle, and pedestrian travel. WSDOT, with cooperation from SDOT, the Port of Seattle, and King County, will establish a Tolling Advisory Committee to provide strategies for minimizing diversion impacts.

As part of the Bored Tunnel project and related projects, WSDOT and

partner agencies have or will implement several strategies that should reduce the effects of potential diversion. 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.In advance of construction, WSDOT funded Intelligent Transportation System (ITS) investments that provide improved signal operations and travel time information on SR 99 and city streets such as 15th Avenue NW that were likely to see increased volumes due to SR 99 construction activities. These investments will have lasting value. Supplemental transit services and transportation demand management were also implemented with assistance from the City of Seattle and King County and these strategies can form the blueprint for future strategies. FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Surface Alternative. As explained in the 2010 Supplemental Draft EIS and the Final EIS, the Surface Alternative does not meet the project's purpose and need to provide capacity to and through downtown Seattle. Because the project has evolved since comments were submitted in 2004 and 2006, please refer to the Final EIS for current information.

I-099-010

Over time, more than 90 potential replacement options have been assessed.

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. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the

other two alternatives. Extended closure of SR 99 would be more disruptive to Seattle and the Puget Sound region. Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS provide a more in-depth comparison of trade-offs for the three alternatives.