**From:** Alexander Broner [abroner@hawaii.edu]
**Sent:** Monday, December 13, 2010 6:23 PM
**To:** AWV SDEIS Comments
**Subject:** a fair comparison of options

I-017-001 Hello my name is Alex Broner. I've lived in Seattle for three years and at the moment I'm studying urban planning at University of Hawaii.

Thank you for reading my comments, I hope you take them seriously and use them to improve this document.

I read Attachment A of Appendix C in which justification is given for excluding the I5/Surface/Transit option from analysis. This exclusion is problematic in two ways.

1. Comparing a 4.2 billion dollar tunnel to the 3.3 billion dollar surface transit option is in no way a fair comparison. When the stakeholders worked with you they were given a certain budget with which to develop solutions. When additional money was found from the city, the port, and from tolling this should have gone into the EIS process at the alternatives formulation level. This lack of apples to apples comparison makes a mockery of the EIS process and should it make it into the final EIS may trigger lawsuits that may delay or derail the project.

I-017-002 2. Attachment A furthermore compares the I5/Surface/Transit option to the deep bore tunnel project without consideration of the effects of tolling. In the stakeholder process Option A was focused on "demand management" in which tolling was a central element. Going forward with an EIS that does not consider tolling impacts as integral on demand is like taking a step backward from all that we know and all the work put into the stakeholder process.

I-017-003 Here's what I propose.

a. Bring the stakeholders group back together to develop a surface transit option that has a comparable budget to the tunnel. We'll call this surface/transit 2.0

I-017-004 b. Treat tolling as integral to the tunnel option and select a demand management strategy that maximizes use of the tunnel and minimizes use of surface streets while meeting funding goals. This will probably mean congestion pricing on surface streets designed to mitigate the worst of tolling diversion during peak periods. Certainly I5 and downtown should be included, probably all north/south routes on this side of lake Washington and possibly 405 as well. Increased demand management might also raise additional revenue to fund the transit identified in the original tunnel agreement. We'll call this tunnel 2.0

**I-017-001**

The Final EIS Chapter 3, Alternatives Development, describes the environmental documentation and alternatives analysis that occurred prior to the 2010 Supplemental Draft EIS, which included the I-5, Surface, and Transit Hybrid. This approach was seriously considered during the Partnership Process, but was rejected because the lead agencies determined it lacked the capacity to serve the long-term needs of the region. The Surface and Transit Scenario Year 2030 Analysis Results is included in Appendix W, Screening Reports, of 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 that it has received from diverse interests.

Although costs are an important part of project planning and decision-making, they are purposely not a major part of the environmental review process. As provided in CFR 1502.23 "For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations." Overall project costs are included with the project description and are used for the analysis of economic impacts. 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.

I-017-005

c. Compare the tunnel 2.0 to surface transit 2.0 and take into account state goals for VMT reduction and city goals for carbon neutrality in assessing various options

A complete EIS process is essential for good public decision-making, I hope you take these comments seriously and use them to improve the EIS process.

Sincerely,
Alex Broner

**I-017-002**

A detailed tolling analysis has been conducted for the build alternatives and is described in this Final EIS. Please refer to Appendix C, Transportation Discipline Report, for additional detailed analysis of tolling impacts to transportation elements. Tolling analysis was not conducted for the surface/I-5 alternative.

**I-017-003**

Please refer to the response to Comment I-017-001.

**I-017-004**

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. Chapter 8 of the Final EIS further discusses the role and objectives of the Tolling Advisory Committee.

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.

**I-017-005**

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 did not meet the project's purpose as identified in the 2004 Draft EIS. Subsequent to the publication of the 2004 Draft EIS, a hybrid approach of I-5, Surface, and Transit hybrid was developed through the 2008 partnership process. The Surface and Transit Scenario Year 2030 Analysis Results is included in Appendix W, Screening Reports, of the Final EIS. This concept was eventually dropped in favor of the three build alternatives analyzed in the 2010 Supplemental Draft EIS and Final EIS for the following reasons as presented in the 2010 Supplemental Draft EIS (Exhibit 3-9):

- Mobility for trips heading to and through downtown would be reduced, and for some trips, travel times would increase substantially compared to existing conditions or bypass concepts.
- North-south capacity would be reduced, resulting in added congestion on city streets and I-5.