From: Seth Geiser [sgeiser5@gmail.com]
Sent: Monday, December 13, 2010 4:39 PM
To: AWV SDEIS Comments
Subject: Comments for Alaskan Way Viaduct Replacement EIS

I-051-001 Others have stated concerns against the planned construction of a deep-bore tunnel to replace the Alaskan Way Viaduct, so I'll keep my comments concise:

1. The tunnel plan maintains an auto-dominated, car-first transportation system that is at odds with laws and policies aimed at reducing VMT and CO2 emissions.

I-051-002 2. In a time of financial cutback at every level of government, the tunnel plan is the highest-cost and highest-risk alternative.

I-051-003 3. Because high numbers of viaduct users will be displaced onto Seattle streets (either through lack of downtown exits or aversion to tolls), a surface plan that includes improved transit service and bike/ped amenities will be needed anyway.

I-051-004 4. The tunnel would be constructed in unstable soils, near water, underneath downtown towers, in proximity of an active faultline, at an unprecedented size, all for the purposes of maintaining travel times for single-occupancy vehicles over a mile-long corridor. That the criteria set forward within the EIS allowed this plan to be advanced as the preferred option should indicate that the project criteria need to be seriously reevaluated.

I-051-005 5. The integrity of the EIS as a useful tool to develop preferred alternatives and protect citizens from environmental, economic and social harm is at risk. The brokering of contracts and agreements prior to the draft EIS, let alone the FEIS, does a disservice to the citizens of the State and the principles of the SEPA.

In conclusion, I implore all of those in decision-making capacities to take a step back and seriously consider the costs and benefits of the tunnel plan. Surely, some combination of investments can be found that would meet our mobility needs without putting the city and State in danger of economic ruin.

-Seth Geiser

I-051-001

Estimates for the potential direct emissions of greenhouse gases under the build alternatives are provided in the Final EIS and Appendix R, Energy Disipline Report. All of the build alternatives would result in a decrease in greenhouse gas emissions, compared to the Viaduct Closed (No Build Alternative).

The study area evaluated includes areas likely to be affected by changes in greenhouse gas emissions as a result of the project. The greenhouse gas effects were estimated for roadways within the city center area, as well as in the region. The city center area is bordered by Prospect Street on the north, 15th Avenue on the east, S. Holgate Street on the south, and Elliott Bay on the west. The region includes all the traffic movements in King, Pierce, Snohomish, and Kitsap Counties.

I-051-002

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-051-003

If the Bored Tunnel Alternative is selected, the final configuration of Alaskan Way and the public amenities located along the central waterfront would be determined by the City of Seattle's Central Waterfront Project. However, the Bored Tunnel Alternative does include a reconfigured Alaskan Way between S. Atlantic Street to S. King Street, with a sidewalk on the west side and a minimum 25-foot wide multi-use path on the east side.

I-051-004

The bored tunnel design includes improving relatively soft, liquefiable soils found near the south tunnel portal, as well as improving and stablizing soil align the bored tunnel alignment, as needed. The alignment of the bored tunnel curves away from the central waterfront area and the aging seawall so most of its alignment is not adjacent to water, and the tunnel would be built to current seismic standards.

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 alternatives.

I-051-005

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). In addition, Section 1053 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), allows agencies to award a design-build contract before NEPA is complete. However, the design-builder cannot proceed beyond preliminary design until the Record of Decision is issued, and the design-builder cannot be involved in nor bias the NEPA process (Code of Federal Regulations, Title 23, Section 636 [23 CFR 636]).

Please see Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS as they provide a comparison of effects for the build alternatives.