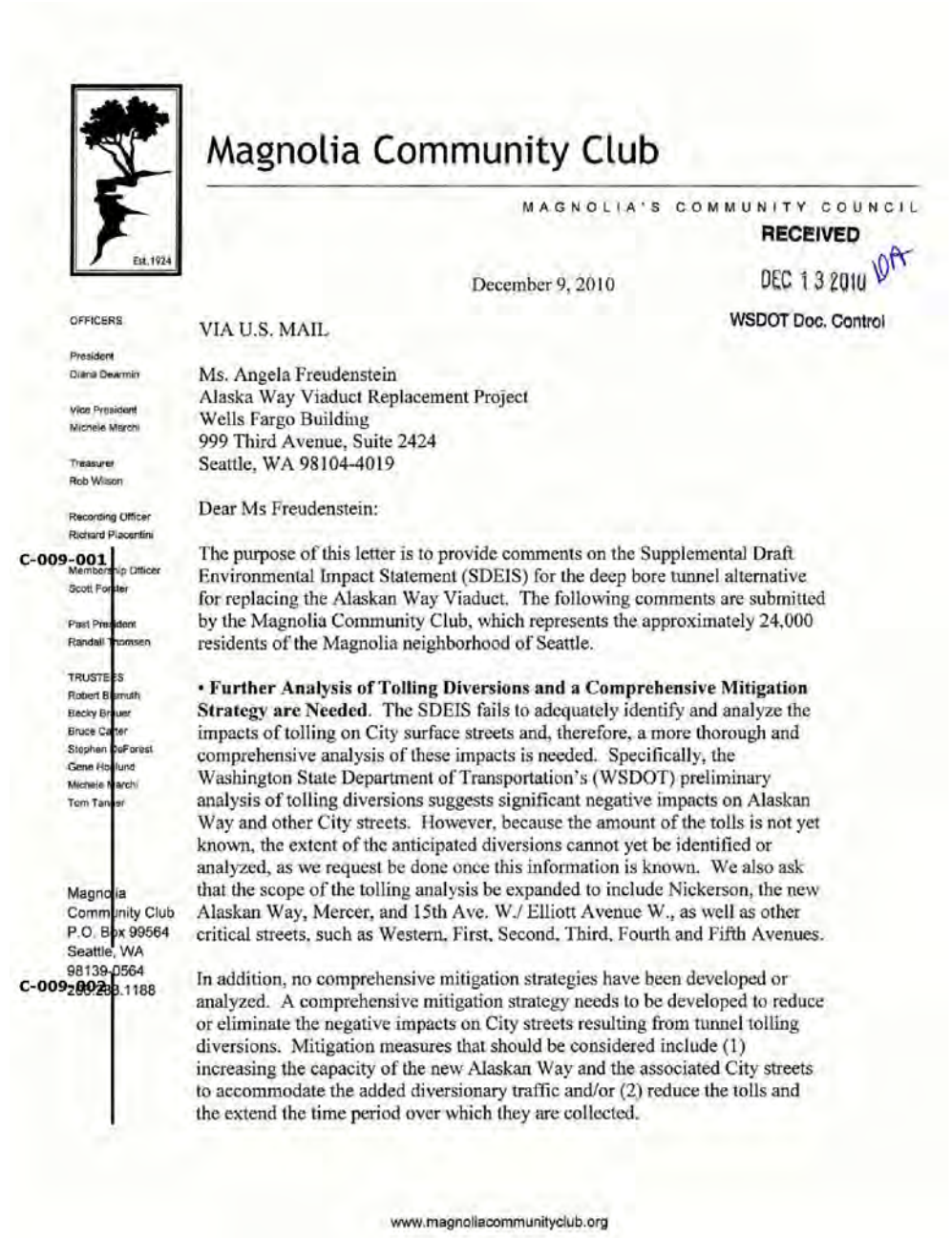

Magnolia Community Club

MAGNOLIA'S COMMUNITY COUNCIL

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December 9, 2010

VIA U.S. MAIL

Ms. Angela Freudenstein
Alaska Way Viaduct Replacement Project
Wells Fargo Building
999 Third Avenue, Suite 2424
Seattle, WA 98104-4019

Dear Ms Freudenstein:

The purpose of this letter is to provide comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the deep bore tunnel alternative for replacing the Alaskan Way Viaduct. The following comments are submitted by the Magnolia Community Club, which represents the approximately 24,000 residents of the Magnolia neighborhood of Seattle.

C-009-001

• **Further Analysis of Tolling Diversions and a Comprehensive Mitigation Strategy are Needed**. The SDEIS fails to adequately identify and analyze the impacts of tolling on City surface streets and, therefore, a more thorough and comprehensive analysis of these impacts is needed. Specifically, the Washington State Department of Transportation's (WSDOT) preliminary analysis of tolling diversions suggests significant negative impacts on Alaskan Way and other City streets. However, because the amount of the tolls is not yet known, the extent of the anticipated diversions cannot yet be identified or analyzed, as we request be done once this information is known. We also ask that the scope of the tolling analysis be expanded to include Nickerson, the new Alaskan Way, Mercer, and 15th Ave. W./ Elliott Avenue W., as well as other critical streets, such as Western, First, Second, Third, Fourth and Fifth Avenues.

C-009-002

In addition, no comprehensive mitigation strategies have been developed or analyzed. A comprehensive mitigation strategy needs to be developed to reduce or eliminate the negative impacts on City streets resulting from tunnel tolling diversions. Mitigation measures that should be considered include (1) increasing the capacity of the new Alaskan Way and the associated City streets to accommodate the added diversionary traffic and/or (2) reduce the tolls and the extend the time period over which they are collected.

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C-009-001

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.

C-009-002

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. 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

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C-009-003 • **The New Alaskan Way Must Be Able to Move Traffic Efficiently.** There must be a commitment by WSDOT and the City of Seattle to ensure the new Alaskan Way is developed to move traffic efficiently and effectively. There are many competing demands for how the new waterfront is to be developed. It is essential that the new Alaskan Way be able to efficiently service residential, commercial, and maritime traffic coming and going from the west and northwest areas of Seattle. Therefore, the mitigation measures must be revised to include specific benchmarks for traffic flow along the new Alaskan Way and for the implementation of contingency plans if traffic flow does not meet those benchmarks. Contingency plans may include the development of additional capacity improvements or the redirection of traffic to alternate roadways.

C-009-004 • **The West Mercer Project is Critical to Magnolia.** The West Mercer Project has the potential to significantly help move traffic from 15th Avenue W./Elliott Avenue W. along Mercer to access the proposed North Portal and I-5. Therefore, the SDEIS needs to address existing and anticipated future traffic congestion at the intersection of Elliott Avenue W. and W. Mercer Place given that the elimination of the Elliott/Western ramp to SR 99 and the proposed location of the North Portal will significantly alter existing traffic patterns along this major arterial. These changes are expected to detrimentally impact Magnolia's access both north/south and east/west. One specific mitigation measure that must be included and implemented is adequate carrying capacity eastbound at the W. Mercer Place hill to prevent the stacking up of vehicles, especially buses and trucks, in the two southbound left turn lanes on Elliott Avenue. Rapid Ride bus service is expected to begin in 2012 and the proposed bus route is up the W. Mercer Place hill. Even now, during rush hour, vehicles often extend beyond the left-turn lanes into the general purpose lanes. Also, W. Mercer Place does not have a sidewalk, so any redevelopment of this corridor requires the construction of an adequate sidewalk to convey pedestrians safely along the W. Mercer Place hill. Finally, timely construction of this project is essential so that the W. Mercer improvements are in place to facilitate access to the North Portal and I-5 once the Viaduct is removed from service and while the new Alaskan Way is being constructed.

C-009-005 • **A Comprehensive Detour Plan is Necessary for the 3-Year Period While the Viaduct is Removed and the New Alaskan Way is Constructed.** The SDEIS omitted a clear mitigation strategy during construction. WSDOT, working in conjunction with the City of Seattle and the Port of Seattle, needs to develop a mitigation strategy includes appropriate detours through City streets to maintain a reasonable flow of residential, commercial, and maritime traffic coming and going to the northwest areas of Seattle while the new Alaskan Way is being constructed and the Viaduct is no longer in service. Such a mitigation strategy is necessary because not all traffic will be able to or will choose to use the tunnel and there will be a critical need to move traffic north and south efficiently during the approximately 3-year period while the new Alaskan Way is being constructed.

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.

C-009-003

The updated transportation analysis and permanent effects to traffic are discussed for all of the build alternatives in Chapter 5, of the Final EIS and in Appendix C, Transportation Discipline Report. The ultimate design of Alaskan Way will be determined as part of the City of Seattle's Central Waterfront Project.

C-009-004

The West Mercer Project is an independent project being led by the City of Seattle and the details contained in this comment are not relevant to replacement of the Alaskan Way Viaduct. The West Mercer Project is important to the City's transportation system and as such it is included in the cumulative effects evaluation for the viaduct replacement project.

C-009-005

Overall construction effects of each of the alternatives are described in

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We thank you for your attention to these important comments on the SDEIS.

Sincerely,

Diana Dearmin
President, Magnolia Community Club

cc: (via email)
Tom Rasmussen, Chair of Transportation Committee for Seattle City Council (Tom.Rasmussen@seattle.gov)
Bill Bryant, President of Port of Seattle Commissioners (bill.bryant@portseattle.org)
Larry Phillips, Chair of Transportation Committee for King County Council (larry.phillips@kingcounty.gov)
Senator Jeanne Kohl-Wells (kohl-wells.jeanne@leg.wa.gov)
Representative Reuven Carlyle (carlyle.reuven@leg.wa.gov)
Representative Marylou Dickerson (dickerson.marylou@leg.wa.gov)
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Final EIS Appendix C, Transportation Discipline Report. For environmental documentation purposes, the worst stage of construction for traffic was analyzed quantitatively while the overall construction activities were described qualitatively.

Demolition of the existing Alaskan Way Viaduct would occur as part of the viaduct replacement project. As part of that project, standard maintenance of traffic during construction plans will be developed, communicated with the general public, and implemented during project construction.