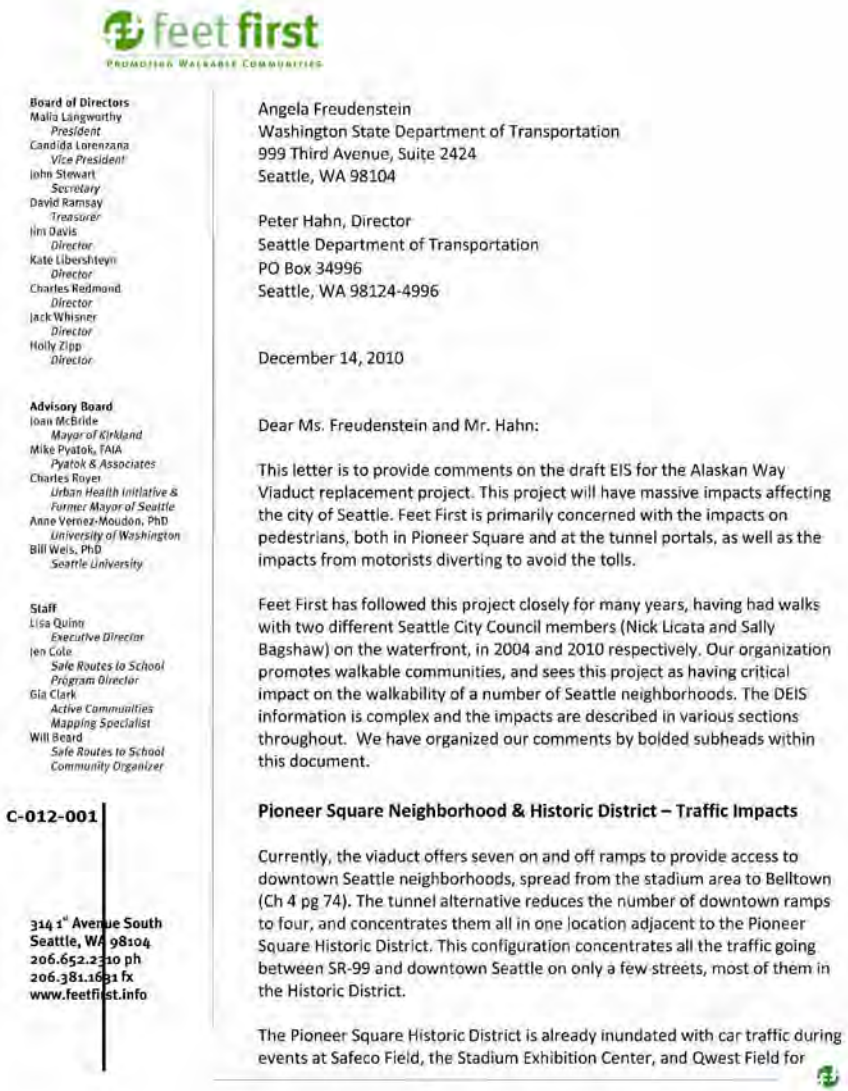

feet first
PROMOTING WALKABLE COMMUNITIES

C-012-001

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Washington State Department of Transportation
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Peter Hahn, Director
Seattle Department of Transportation
PO Box 34996
Seattle, WA 98124-4996

December 14, 2010

Dear Ms. Freudenstein and Mr. Hahn:

This letter is to provide comments on the draft EIS for the Alaskan Way Viaduct replacement project. This project will have massive impacts affecting the city of Seattle. Feet First is primarily concerned with the impacts on pedestrians, both in Pioneer Square and at the tunnel portals, as well as the impacts from motorists diverting to avoid the tolls.

Feet First has followed this project closely for many years, having had walks with two different Seattle City Council members (Nick Licata and Sally Bagshaw) on the waterfront, in 2004 and 2010 respectively. Our organization promotes walkable communities, and sees this project as having critical impact on the walkability of a number of Seattle neighborhoods. The DEIS information is complex and the impacts are described in various sections throughout. We have organized our comments by bolded subheads within this document.

Pioneer Square Neighborhood & Historic District – Traffic Impacts

Currently, the viaduct offers seven on and off ramps to provide access to downtown Seattle neighborhoods, spread from the stadium area to Belltown (Ch 4 pg 74). The tunnel alternative reduces the number of downtown ramps to four, and concentrates them all in one location adjacent to the Pioneer Square Historic District. This configuration concentrates all the traffic going between SR-99 and downtown Seattle on only a few streets, most of them in the Historic District.

The Pioneer Square Historic District is already inundated with car traffic during events at Safeco Field, the Stadium Exhibition Center, and Qwest Field for

C-012-001

As an on-going task for the overall planning and design effort, the project team will continue to communicate and coordinate with the Mariners and Seahawks organizations as well as the affected Pioneer Square and SODO businesses to ensure that reasonable measures are in place to accommodate trip activities during large sporting events. The proposed Stadium Area ramp connections to/from the north would essentially relocate the existing First Avenue S ramp connections to the frontage road at S. Royal Brougham Way. Therefore, traffic volumes on S. Atlantic Street or S. Royal Brougham Way east of First Avenue S. would not be expected to substantially change, even for larger sporting events at Qwest Field or Safeco Field. However, it is recognized that the revised SR 99 connections to/from the north and new SR 99 connections to/from the south will result in changes in travel patterns, redirecting some traffic from First Avenue S. to the frontage road and sections of S. Atlantic Street and S. Royal Brougham Way west of First Avenue S. It is also recognized that additional traffic will be concentrated along Alaskan Way and parallel arterials such as First Avenue as a result of the Bored Tunnel Alternative. Please consult the Transportation Discipline Report (Appendix C) of the Final EIS for more information regarding traffic conditions related to the Bored Tunnel Alternative.

C-012-001 almost 100 days a year, with a decent percentage of these happening during the week at rush hour. Accommodating additional traffic generated by the southern portal, including at least 50,000 cars a day and possibly 45,000 more due to toll diversion, on event days will be extremely challenging,

Feet First believes additional study is needed to understand how this additional traffic, at least 50,000 cars a day, and possibly 45,000 more with toll diversion, generated by the southern portal, will be accommodated on event days.

C-012-002 After analyzing the traffic impacts on surface streets that would result from tolling, the DEIS concludes that "These effects would not be acceptable as part of a long term tolling solution." (Ch 9, pg 214) No alternative is suggested other than to say another alternative is needed. **This is not acceptable**. The entire purpose of a DEIS process is to examine alternatives, yet in this document we are presented with an alternative deemed unacceptable with no valid options for consideration.

C-012-003 Without tolling, the DEIS says that 29,000 additional cars will shift to City streets from SR-99 (Ch 2 pg 19). Specific to the Pioneer Square neighborhood, the DEIS states that 50,000 cars a day are expected to use the southern portal ramps (Ch 5 pg 104). If tolling is implemented, as required by the funding plan for the project, an additional 40,000 to 45,000 cars are expected to divert to city streets. How many of these diverted cars are expected to use the southern portal, and the City streets to access this portal? The DEIS does not provide specific information on the number of diverted cars expected to use the southern portal ramp or city streets to access this ramp. The DEIS needs to more clearly define these impacts.

C-012-004 Traffic impacts to Pioneer Square Historic District streets are unacceptable. The existing street grid in this area is not well connected, and there are not many viable routes. Some of the streets are narrow, historic, physically fragile, pedestrian oriented and not suitable for use as access roads to a highway interchange. With the planned First Hill streetcar extending into the neighborhood in some scenarios, additional burden will be placed on these narrow streets. Feet First has already identified significant concerns about the area around the portals in previous correspondence.

This DEIS **must** describe in more detail the traffic volumes that are expected on specific streets around the southern portal. Feet First has five specific requests for additional data:

1) How many cars will use Alaskan Way, First Ave, Second Ave, Fourth Ave? This DEIS must identify street revisions to make room for all these cars, and describe in detail the impacts of these solutions.

C-012-005 2) How will the planned revisions affect the pedestrian character of the streets? Will WSDOT remove on-street parking, or any of the mature and cherished London Plane trees in the Historic District? The DEIS needs to include more details on pedestrian impacts in Pioneer Square.

C-012-006 3) Will these changes affect the access to and viability of retail? The DEIS does not mention this, and given the fragile nature of the Historic District Feet First believes more study is warranted.

C-012-007 4) Are these historic streets, built on fill and supported by 100 year old areaways and retaining walls, physically capable of carrying this much traffic? Again, the DEIS does not provide sufficient data to indicate enough work has been done on impacts in Pioneer Square.

C-012-008 5) If the impacts to transit are unacceptable, what alternative solution or mitigation is being offered? While we talk more about transit in particular later in this letter, it is important to point out again the DEIS provides no mitigation for the transit impacts of the project. Pedestrians need good transit, and Feet First believes this DEIS must contain better transit options.

C-012-002

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 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

C-012-009

How many of these toll diversion trips will use the new Alaskan Way surface street on the waterfront? How would this impact the waterfront parks and public spaces being planned now? The Mercer Street project includes significant changes to Valley, the street running closest to the south end of Lake Union, to narrow and calm the street and make it a safer environment for pedestrians and cyclists. A significant number of toll diversion trips on Alaskan Way will increase the pressure to widen this street and 'take advantage' of the right-of-way created with the Viaduct's removal. This would have significant impact on the viability of the Alaskan Way/waterfront public spaces and their walkability.

C-012-010

To avoid burdening Historic District streets with an influx of traffic generated by the southern portal, additional alternatives and mitigation must be considered, such as additional transit, or routing traffic away from the Historic District, or demand management. These ideas should be evaluated to determine the impacts of these possible solutions. A mitigation plan must be developed to show how WSDOT will prevent, resolve, or mitigate the intolerable detriments to the functioning of Seattle's local transportation system.

C-012-011

Pioneer Square Neighborhood and Historic District – Areaways/historic walking tour

Boring a tunnel next to Seattle's historic Pioneer Square neighborhood, with its historic buildings, fragile and brittle infrastructure, high water table, and unstable soils, is a steep engineering challenge. This DEIS describes the risks of digging and boring in this location (Ch 5 pg 126), possible damage to 12 historic structures (Ch 2 pg 31), and possible collapse or dramatic damage to two buildings (Ch 6 pg 142) during construction, and mentions measures to protect structures.

The DEIS says this of the Western and Polson buildings, both 'contributing' buildings in the Pioneer Square Historic District: "Mitigation measures to protect the buildings may not prevent the need for demolition to avoid the possibility of collapse."

The DEIS says twelve buildings within the Pioneer Square Historic District or listed on the National Register of Historic Places – including the Historic Federal Building -- may be affected by settlement, structures could crack, and utilities may be disrupted or damaged. While the DEIS states measures will be implemented to avoid or minimize damage, it mentions that unavoidable damage might still occur with the preferred alternative. Feet First has specific requests for additional data:

1. What damage could soil settlement from tunnel boring cause, specifically?
2. What is the likelihood of unavoidable damage? Will residents and users of those buildings be at risk of harm?
3. Will Pioneer Square's unique but delicate areaways and historic underground level be at risk?
4. What buildings specifically will be required to have their supporting soil improved with jet grout?
5. What impacts will that have on the use of their underground portions?
   What sidewalks will be closed, what streets will be closed, what basements will be altered, what areaways will be temporarily or permanently affected?
6. Specifically, what impact will this have on the famous Underground walking tour, a Seattle tradition and tourist favorite?

C-012-012

Some of the 'solutions' proposed in the DEIS actually exacerbate other problems. Given that water table is quite close to the surface, there is risk that the solidification of soils -- due to tunnel walls, retained cuts at the portals, and the injection of jet grout under buildings -- might alter natural water flows, create a water barrier, and cause water to back up in the Pioneer Square Historic District. (Ch 5 pg 127). Feet First asks that the DEIS

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-012-003

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-012-004

During operation of the Bored Tunnel, traffic volumes on surface streets in the Pioneer Square area, for all three build alternatives, are expected to be less than the 2030 Viaduct Closed (No Build Alternative). Analysis of traffic patterns for vehicles accessing ramps to and from SR 99 in the stadium area show that vehicles will disperse on to a variety of streets in the area, such as Royal Brougham, Alaskan Way, 1st Avenue, 4th Avenue, etc. Please see the Final EIS Chapter 5 and Appendix C, Transportation Discipline Report for updated transportation analysis. Appendix I, Historic, Cultural, and Archaeological Resources Discipline Report, of the Final EIS also contains information about the operational effects of the build alternatives on the Pioneer Square Historic District; traffic was considered in the analysis.

The ultimate design of Alaskan Way will be determined as part of the City of Seattle's Central Waterfront Project.

C-012-012 include a full evaluation of the impacts of working within these conditions, provide more information on the potential impacts that could significantly harm the Pioneer Square neighborhood, and pay particular attention to impacts on pedestrians moving through the area.

C-012-013 **Pedestrian Treatments - North and South Portals**

The areas around both the North and South Portals are located in vibrant urban neighborhoods that generate large volumes of pedestrians. Traffic volumes will likely significantly increase on the main roads accessing both portals, such as South Royal Brougham Way, South Dearborn Street, South King Street, South Atlantic Street, South Charles Street, Aurora Avenue North, Sixth Avenue North, and Dexter Avenue North. Street design at key pedestrian crossing locations should incorporate enhanced pedestrian crossing design elements. This would include refuge islands, enhanced pavement markings, and tight turn radii.

C-012-014 **Transit – The Pedestrian's Friend and Forgotten Partner**

After analyzing tolling impacts on transit riders (Ch 9, pg 215) the DEIS concludes again that "These effects would not be acceptable as part of a long term tolling solution." As the preferred alternative is described, the negative impacts to local traffic are egregious. When the diversion effects of tolling are included, these impacts worsen. Transit must be part of the solution.

Many of our members and supporters use transit to extend their pedestrian trips, and we have long been aware of the important relationship between pedestrians and transit. When the bored tunnel as preferred alternative was announced in January 2009, the package included $190 million worth of transit investments and $15 million worth of transit service. Additional transit service was then, and is now, essential for providing access to and from downtown Seattle, since the bored tunnel does not provide sufficient access by itself. Additional transit service should be included in this analysis and analyzed for its utility and effect on traffic on streets and in the bored tunnel.

Given WSDOT's insistence the City of Seattle is responsible for ramps, surface street projects, and mitigation related to the tunnel, it is clear there will be minimal funding for the necessary transit projects required by the tunnel. It is our further belief that WSDOT's position on this issue is incorrect, and that projects related to getting vehicles to and from the tunnel should be funded by the State, not the City. Transit is already in a very difficult fiscal condition, with both King County Metro and Sound Transit suffering significant loss of revenue from declining sales tax receipts.

C-012-015 **Sustainability**

The preferred alternative directly violates several city and state policies regarding emissions reduction, vehicle miles traveled reduction, multi-modal transportation, complete streets, and carbon neutrality. It may seriously hamper access between urban neighborhoods for pedestrians, bikes, and transit users by flooding local streets with private vehicles, and increasing emissions. The following plans and goals adopted by the City of Seattle goals are in direct conflict with the project, which include:

- City policy from Climate Action Plan
- City policy from Comprehensive Plan
- City goals for Carbon Neutral Seattle

C-012-005

Analysis of traffic patterns for vehicles accessing ramps to and from SR 99 in the stadium area show that vehicles would disperse onto several streets such as S. Royal Brougham Way, Alaskan Way, First Avenue, Fourth Avenue, etc. Please see the Final EIS Appendix C, Transportation Discipline Report, for the transportation analysis. Because traffic in Pioneer Square is controlled by signals, it is not anticipated that the increased volume will affect the pedestrian character or make it more difficult to walk to shops or restaurants. Pioneer Square has historically been an active place with a high volume of traffic. There are no plans to remove the trees in the median. Appendix I, Historic, Cultural, and Archaeological Resources Discipline Report, of the Final EIS also contains information about the effects of the build alternatives on the Pioneer Square Historic District.

The project has allocated funds for parking mitigation and has identified strategies for short-term parking and for contractor parking during construction. Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

C-012-006

The location of the South Portal of the Bored Tunnel Alternative near the waterfront and south of King Street would isolate the South Portal Construction from the existing retail area of Pioneer Square. After construction, the new Dearborn Street connection would improve circulation around the South Portal compared to existing conditions. The retail area in Pioneer Square, though not in the area of direct effects during construction, would see some increase in traffic as described in Appendix C of the Transportation Discipline Report. However, access to these businesses would not be affected. Nevertheless, the project cannot assure the viability of existing businesses as there a re many

C-012-015 The City and State both have policies urging transportation agencies to pursue decreased Vehicle Miles Traveled over time, and increase the viability of other modes, as part of a larger effort to reduce green house gas emissions from vehicles. State law says we shall "By 2035, reduce overall emissions of greenhouse gases in the state to twenty-five percent below 1990 levels." (http://apps.leg.wa.gov/rcw/default.aspx?cite=70.235.020)

C-012-016 **The assumptions in this EIS portraying an increased need for and usage of car capacity are counter to City and State policy.** These assumptions are also counter to evidence that car travel in this corridor has been flat for 12 years. This DEIS should aim for and explain how this project could help reduce the need for car usage in compliance with the state's VMT reduction targets. This analysis should also include pedestrian, bicycle, and transit modes.

C-012-017 The **statement of purpose and need** (Ch 1 pg 4) should continue to use the long- established definition for this project, 'mobility for people and freight', and not redefine the target as vehicle 'capacity.' In the 2006 SDEIS the purpose was to "...maintain or improve mobility, accessibility, and traffic safety for people and goods along the existing Alaskan Way Viaduct Corridor." This statement of purpose and need allowed for sustainable solutions --such as transit, demand management, or use of available capacity on existing facilities-- to be considered. Use of the term capacity instead of mobility precludes possible cost-effective solutions and counters city and state transportation policy.

C-012-018 In light of the EPA's recent decision to regulate **greenhouse gases as pollutants**, the DEIS should compare the greenhouse gas emissions for all the alternatives. The analysis should examine the construction emissions and cumulative use impacts of the solution - not just the trips on the facility, but the area-wide effects generated by the decision in this corridor.

C-012-019 An additional report is required that analyzes in detail how different alternatives could better meet the intentions and specific directions of these policies discussed above.

Appropriate Review of Reasonable Alternatives

It is clear from Feet First's review of the DEIS that the tunnel alternative is an expensive project with many unresolved challenges, and significant risk to the City of Seattle. The preferred alternative does not solve the full challenge of viaduct replacement, and is clearly incomplete without solutions that enhance local mobility.

The alternatives do not effectively replace access into Seattle without putting the Pioneer Square Historic District at risk. This DEIS should compare current and reasonable alternatives to the tunnel, in case its merits do not outweigh the costs and risks.

The DEIS should address the need for good access into downtown Seattle neighborhoods, and study how to best provide this access for people and freight. The DEIS should also analyze additional transit service, demand management programs, street improvements that route local trips to other arterials, and I-5 improvements to shed light on how best to improve access to Seattle neighborhoods.

At the conclusion of the 2008 stakeholder process, the leaders of the City, County and State Departments of Transportation recommended two alternatives for viaduct replacement: the I-5/ Surface / Transit hybrid, and the Elevated / Transit hybrid. After a year-long evaluation, these two approaches proved best for meeting the

factors that contribute to the success or failure of an individual business that are beyond the control of the project.

C-012-007

Pioneer Square has historically been an active place with a high volume of traffic. The streets regularly have large amounts of vehicles, particularly during sports events. The areaways have been inspected and instrumentation has been installed in the First Avenue S. areaways; they have been monitored for several years. The structures would be reinforced if monitoring showed a need.

Analysis of traffic patterns for vehicles accessing ramps to and from SR 99 in the stadium area show that vehicles would disperse onto several streets such as S. Royal Brougham Way, Alaskan Way, First Avenue, Fourth Avenue, etc. Please see the Final EIS Appendix C, Transportation Discipline Report for the transportation analysis.

C-012-008

Refer to Chapter 8 Mitigation in the Final EIS for more information on mitigation strategies. Added King County Metro transit service will be provided as part of construction mitigation. Also, improvements to the speed and reliability of transit service will be supported by the project and will continue following construction completion. While some added travel time would be incurred by buses under the Bored Tunnel Alternative, transit operations would still be maintained. The project would not be supporting ongoing transit expansion following construction completion. However, transit service enhancements are expected in downtown Seattle; for example, Sound Transit LRT and commuter rail expansion under Sound Transit 2 and the King County Metro RapidRide bus program.

C-012-019 agencies' six goals for viaduct replacement. **These two solutions are reasonable, current, and should be evaluated in this DEIS.**

City of Seattle Ordinance 12246 states the City's preference for an alternative: "In the event a tunnel proves to be infeasible, the City recommends the development of a transit and surface street alternative that meets the intent of Resolutions 30664 and 30724." This alternative would offer the City one of the key advantages it seeks – reclaiming the downtown waterfront – at a significant cost savings.

Summary

C-012-020 This DEIS reveals that the merits of the preferred alternative are fewer than expected, and the harms and risks higher. The bored tunnel alternative, as described in this DEIS, only solves a portion of the challenge.

Specifically:

1. As the preferred alternative is described, the negative impact on local traffic is significant.
When the diversion effects of tolling are included, the negative impact appears intolerable.
A mitigation plan must be developed to show how WSDOT will prevent, resolve, or mitigate the intolerable impacts on the streets of the Pioneer Square Historic District. Additional transit, a robust traffic management plan to shift traffic away from Historic District streets, transportation demand management, improvements to I-5 - even relocating the interchange or two of the ramps elsewhere - should be analyzed for their ability to protect Historic District streets.

C-012-021 2. When the bored tunnel as preferred alternative was announced in January 2009, the deal included $190 million worth of transit investments and $15 million worth of transit service. Additional transit service was then, and is now, crucial in providing access to and from downtown Seattle, since the bored tunnel does not provide sufficient access by itself. Transit service should be included and funded as part of the project, Pedestrians need transit as a trip extension tool, and benefit greatly from transit service.

C-012-022 3. A mitigation plan must be developed to show how WSDOT will prevent, resolve, or mitigate the risks to historic buildings along the tunnel route, and specifically to the Pioneer Square Historic District.

C-012-023 4. A full budget for the above mitigation plans should be developed that identifies the appropriate source for responsibility. This is a state project, and the state must show it can cover costs for:

- the bored tunnel itself,
- other project components promised as part of the program (lids over the cut and cover sections, improvements to the street grid around the portals, pedestrian, bike and transit improvements, urban design and landscaping around the portals, etc),
- protection of or mitigation for local streets and historic resources, and
- any cost escalations that may occur due to the project risks.

Because of the state's firm cost cap at $2.4 billion, the lack of clarity around what costs are covered in the two bids, and the continuing contention around the liability for cost overruns, and the $700 million of project funding still not secured, decision makers at the City and State deserve a clear picture of total project costs compared to secure funding. The City of Seattle, local neighborhoods, or local property owners cannot be held liable for costs of the State's project.

C-012-009

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.

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.

Your concern about this project's effect on the Mercer Street projects is noted. The final design for the Mercer Street projects are independent of this project. However, cumulative effects analysis for this project in Chapter 7 of the Final EIS includes the Mercer Street projects.

C-012-010

Mitigation for traffic effects during construction in the project area, including the Pioneer Square Historic District are discussed in Chapter 8 of the Final EIS. WSDOT will prepare a traffic management plan. The only mitigation proposed during the project's operation is related to the reduction of diversion expected due to tolling, also discussed in Chapter 8. With the Bored Tunnel Alternative, traffic using the Stadium

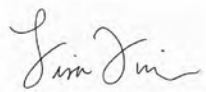
C-012-024

With this project, it is the State's responsibility to protect the pedestrian environment, streets, and physical fabric of the Historic District, including the underground and areaways. The Pioneer Square neighborhood is counting on City elected officials to negotiate with WSDOT on solutions to ensure highway-bound traffic is not routed through Historic District streets and excellent design components for local streets that are altered due to this project and to secure adequate funding for successful completion of this project. All of Seattle is counting on City and State decision makers to ensure that the historic buildings and underground are safe from damage, and Pioneer Square residents and visitors are safe from risks.

As decision makers weigh the alternatives, it is imperative that the answer not only serve automobile bypass trips going through Seattle, but also enhance access into downtown Seattle neighborhoods, support Seattle's policies supporting walking, biking, and transit modes, and ensure the opportunity of the new waterfront is protected and not inundated with excess traffic.

Feet First appreciates the opportunity to provide comments on the DEIS. We expect Washington Department of Transportation will consider these comments carefully, and take swift action to more clearly define the impacts and effects of this project. Should you have questions, feel free to contact me directly by calling 206-652-2310 or emailing lisa@feetfirst.info

Sincerely yours,



Lisa Quinn
Executive Director

cc:
Richard Conlin, Seattle City Council President
Tom Rasmussen, Seattle City Council Transportation Chair
Sally Bagshaw, Seattle City Council
Tim Burgess, Seattle City Council
Sally Clark, Seattle City Council
Jean Godden, Seattle City Council
Bruce Harrell, Seattle City Council
Nick Licata, Seattle City Council
Mike O'Brien, Seattle City Council

area ramps (southern portal) to access downtown would disperse over several city arterials, including the improved Alaskan Way, First, Second, and Fourth Avenues.

C-012-011

The potential effects from soil settlement on historic properties are discussed in Appendix I, Historic, Cultural and Archaeological Discipline Report, of the Final EIS. As the report discusses, there is little risk of damage other than possible cosmetic cracks to a small number of buildings. No residents or building users will be at risk of harm.

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.

The discipline report lists the buildings that will have soil improvements. This process has no effect on the use of the buildings, their basements or adjacent areaways. Only the Polson Building would have basement alterations, but the basement would remain usable after construction. Sidewalks may be closed in the 600 block of Western Avenue for a short period at the beginning of the project.

The Bored Tunnel alignment is some distance from Pioneer Square's areaways and no impacts on them or to the Seattle Underground Tour are anticipated. The areaways have been inspected by structural engineers and are included in the monitoring program; instrumentation has already been installed in First Avenue areaways. The areaways are

discussed in more detail in Chapters 4 and 6 of Appendix I of the Final EIS.

C-012-012

Measures that can be employed to mitigate the risk of groundwater mounding behind tunnel walls or ground improved areas are outlined in the Earth Discipline Report, Appendix P, and summarized in Chapter 5 of the Final EIS. The level of detail provided in the Earth Discipline Report is appropriate for environmental review purposes. The risk of groundwater mounding and associated mitigation will be further evaluated during final design of the project. A design guideline will be to mitigate groundwater mounding so that it is within existing tidal fluctuations in the groundwater.

C-012-013

The project will be designed to meet current roadway design standards, and 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.

Proposed roadway improvements in the south and north portal areas would improve pedestrian access and mobility. Please see the Final EIS Appendix C, Transportation Discipline Report.

C-012-014

Added King County Metro transit service is proposed as part of construction mitigation, but funding for this service has not yet been secured. However, WSDOT is working closely with King County to implement the additional service hours in the most effective manner. Also, improvements to the speed and reliability of transit service will be supported by the project and will continue following construction

completion. The project would not be supporting ongoing transit expansion following construction completion. However, transit service enhancements are expected in downtown Seattle; for example, Sound Transit LRT and commuter rail expansion under Sound Transit 2 and the King County Metro RapidRide bus program.

C-012-015

All of the build alternatives would result in a decrease in greenhouse gas emissions, compared to the Viaduct Closed (No Build Alternative). 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.

The law setting the VMT benchmarks directs WSDOT to adopt broad statewide goals to reduce annual per capita vehicle miles traveled by 2050 consistent with the stated goals of executive order 07-02. The state law does not require individual projects to set VMT reductions. WSDOT is working on this task and related tasks in Executive Order 09-05 in conjunction with a working group established for this purpose because the cumulative greenhouse gas impacts of transportation projects are best addressed at a system-wide level where multiple projects can be analyzed in aggregate, such as in regional transportation plans. This project is included in PSRC's Regional Transportation Plan, *Transportation 2040*, which considered greenhouse gas emissions along with other transportation objectives.

In addition, 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.

C-012-016

This project is not creating additional highway capacity; it is replacing a

facility that has reached the end of its lifespan. Pedestrian, bicycle, and transit modes are thoroughly discussed in each of chapters 4 through 8 of the Final EIS Appendix C, Transportation Discipline Report.

The law setting the VMT benchmarks directs WSDOT to “adopt broad statewide goals to reduce annual per capita vehicle miles traveled by 2050 consistent with the stated goals of Executive Order 07-02.” The state law does not require individual projects to set VMT reductions. WSDOT is working on this task and related tasks in Executive Order 09-05 in conjunction with a working group established for this purpose. The cumulative greenhouse gas impacts of transportation projects are best addressed at a system-wide level where multiple projects can be analyzed in aggregate, such as in regional transportation plans. The Alaskan Way Viaduct Replacement Project is included in PSRC’s Regional Transportation Plan, *Transportation 2040*, which considered greenhouse gas emissions along with other transportation objectives.

For further information regarding sustainable transportation practices at WSDOT please refer to the WSDOT website.

C-012-017

Changes made to the project's purpose and need statement in 2010 did not serve to narrow the scope of concepts that could be considered. Instead the changes that were made allowed for a broader scope of solutions to be considered. The purpose and need statement presented in the 2006 Supplemental Draft EIS stated "the project will maintain or improve mobility, accessibility, and traffic safety for people and goods along the existing Alaskan Way Viaduct Corridor..." This purpose indicated that mobility must be maintained or improved. The project's current purpose and need statement is less restrictive by stating that it will provide a facility that "provides capacity for automobiles, freight, and transit to efficiently move people and goods to and through downtown Seattle". An important difference between the two purposes is that the

earlier purpose statement required mobility to be maintained or improved, the updated purpose statement is focused on providing capacity to efficiently move people and goods to and through downtown Seattle, but it doesn't specify that existing capacity must be maintained.

C-012-018

The Final EIS estimates the potential direct operational emissions of greenhouse gases for the build alternatives under the tolled and non-tolled conditions. 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 affected roadways throughout 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. Please refer to Appendix R, Energy Discipline Report, for additional details.

C-012-019

Chapter 8 (Comparison of Alternatives) in the 2010 Supplemental Draft EIS and Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS do compare effects of the Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure Alternatives. Additionally, the 2010 Supplemental Draft EIS and the Final EIS both discuss how the proposed build alternatives meet the project's established purpose and need.

State, City, and King County leaders did not recommend replacing the viaduct with the I-5, Surface and Transit Hybrid or the Elevated Transit Hybrid. Rather, these concepts were considered as possible solutions through the Partnership Process. In January 2009 Governor Gregoire, former City of Seattle Mayor Nickels, and former King County Executive Sims recommended that the central waterfront portion of the viaduct be

replaced with a bored tunnel. As part of the alternatives development process for the project, the Elevated Structure and Transit Hybrid and the I-5, Surface and Transit Hybrid were considered in the 2010 Supplemental Draft EIS. For reasons discussed on pages 53 through 58 of the 2010 Supplemental Draft EIS, these concepts were screened out for further evaluation in the EIS as potential build alternatives.

The Final EIS Appendix W, Screening Reports, includes the Surface and Transit Scenario Year 2030 Analysis Results. Chapter 2 of the Final EIS discusses the alternatives development.

C-012-020

A detailed tolling analysis has been conducted and is described in the Final EIS. Please refer to Appendix C, Transportation Discipline Report, for additional detailed analysis of tolling impacts to transportation elements.

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. Mitigation strategies could include, bus priority lanes near the north and south portals, ITS investments that provide improved signal operations and travel time information, supplemental transit services and transportation demand management. These mitigation strategies are being implemented with assistance from the City of Seattle and King County.

Please see Chapter 8, Mitigation, of the Final EIS for more discussion regarding mitigation due to tolling.

C-012-021

Added King County Metro transit service is a proposed construction mitigation measure, but funding for this increased service during the duration of the construction period for this project has not yet been

secured (increased transit service is currently bring provided by WSDOT for the S. Holgate Street to S. King Street Viaduct Replacment Project construction period). Also, improvements to the speed and reliability of transit service will be supported by the project and will continue following construction completion. The project would not be supporting ongoing transit expansion following construction completion. However, transit service enhancements are expected in downtown Seattle; for example, Sound Transit LRT and commuter rail expansion under Sound Transit 2 and the King County Metro RapidRide bus program.

C-012-022

Chapter 6 of Appendix I (Historic, Cultural and Archaeological Discipline Report) of the Final EIS discusses potential impacts, minimization and mitigation to historic buildings. Mitigation is also addressed in the Section 106 Memorandum of Agreement. 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.

C-012-023

Cost estimates for mitigation has always been included in the overall project costs. These estimates, along with other cost estimates, are refined as the planning and design process proceeds and details are developed. All cost estimates allow for escalation and inflation.

C-012-024

WSDOT and the City of Seattle are working with the Pioneer Square

businesses, tenants, and property owners to design and implement a project that maintains its integrity. The project's purpose and need statement provided in the Supplemental Draft EIS and the Final EIS outlines the project purposes and needs for the project, which include:

- Providing capacity of automobiles, freight, and transit to efficiently move poeple and goods *to and through* downtown Seattle, and
- Provide linkages to the regional transportation system and *to and from downtown* Seattle and the local street system, and
- Protecting the integrity and viability of adjacent activities on the central waterfront and in downtown Seattle.

The purpose and need for the project focuses on both trips going both to and through Seattle. The ability of the proposed build alternatives to meet the purpose and need statement is discussed in the Final EIS. Proposed project improvements to the pedestrian, biking, and transit modes are also discussed in the Final EIS. Both the 2010 Supplemental Draft EIS and the Final EIS clearly identify the effects and benefits associated with the build alternatives.