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December 13, 2010

Angela Freudenstein
 Project Environmental Manager
 AWV Project Office
 99 3rd Avenue S., Suite 2424
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Dear Ms. Freudenstein:

The King County Department of Transportation (KCDOT) is pleased to submit comments on the Alaskan Way Viaduct Replacement Project Supplemental Draft Environmental Impact Statement (SDEIS). As a program partner, King County has worked closely with the State of Washington, the City of Seattle and the Port since work began to replace the aging and seismically vulnerable viaduct structure, and the bored tunnel program was selected as the preferred alternative.

The SDEIS primarily addresses the highway replacement project component of the overall Viaduct Replacement Program. The highway project will have significant impact to our Metro Transit services both during construction and in the long term. Over two-thirds of all Metro Transit service moves through downtown Seattle on a daily basis. Currently, Metro carries approximately 52,000 people on over 2,200 bus trips every day into or out of the areas that will be directly affected by the construction of the viaduct portals. In addition, Metro carries approximately 100,000 people a day on 4,600 daily bus trips on downtown surface streets that will be further congested during construction. The West Seattle Water Taxi also provides valuable transportation service in this corridor.

The following comments address both the specific highway replacement project and the larger, related Viaduct Replacement Program.

Transit is an essential component of the Viaduct Replacement Program

L-004-001 Transit enhancements are essential to the Viaduct Replacement Program because of transit's central role in providing future mobility. The SDEIS indicates that most of the travel growth in the downtown area by 2030 needs to be carried by transit. While the tunnel will carry the vital trips through downtown, transit will continue to be the workhorse that moves people into and out of downtown.

Construction mitigation for transit service

L-004-002 Transit will also be critical to move as many people as possible during the construction period. Construction work associated with viaduct replacement will impact transit operations throughout

L-004-001

The project agrees that public transit would continue to be an important component of transportation in the project corridor. Several components of the project would be supportive of transit; these include transit speed and reliability improvements that will be available during and after project construction. In the south area, there would be a bus-only lane in the northbound SR 99 off-ramp. In the north area bus-only lanes would be provided on Aurora Avenue that will support transit operations in the South Lake Union area.

L-004-002

The Final EIS Chapter 6 and Appendix C, Transportation Discipline Report (Chapter 6 Construction Effects and Mitigation) identify elements to minimize traffic effects during construction. The mitigation elements are intended to address construction-related effects associated with the project. The project looks forward to working with King County Metro on implementation and monitoring of mitigation elements relating to public transit.

Currently WSDOT is providing funding for King County on the S. Holgate Street to S. King Street Viaduct Replacement Project to provide additional transit service hours to help mitigate the effects of construction. This program is ongoing and regularly monitored to evaluate its effectiveness. For the Alaskan Way Viaduct Replacement Project, WSDOT will continue to evaluate the need for increased bus service in the West Seattle, Ballard, Uptown, and Aurora Avenue corridors during the initial portions of the construction period, as well as a bus travel time monitoring system. WSDOT recognizes the funding anticipated in the agreement has not been realized, and that the recent economic downturn has reduced other funding sources King County currently relies on for providing transit service throughout King County.

L-004-002 the duration of the project, and these impacts need to be mitigated. The State has signed an agreement with the County to provide funding to mitigate similar construction-related impacts to transit during the Holgate to King project construction. The agreement has two primary goals – off-set the delay to transit caused by construction activity, and fund transit enhancements to reduce congestion caused by project construction. An additional State/County mitigation funding agreement with these same goals is needed to address transit impacts during the bored tunnel construction. Mitigation should also be provided during the city-led demolition of the existing viaduct and the construction of the new surface Alaskan Way. The SDEIS should more clearly identify the needed transit mitigation measures and associated funding.

We look forward to working with the State and City of Seattle to develop a transit mitigation agreement for the central waterfront so we can continue to provide robust transit service and keep people moving throughout the construction of the project.

Transit priority pathways

L-004-003 King County has been working with the State and City to establish transit priority pathways at the north and south tunnel portals. While we are pleased with the results of this successful collaboration to date, there is still more work to be done. In general the identified transit priority pathways connecting SR-99 with the 3rd Avenue transit corridor from the north and south need to be better documented in the SDEIS.

In the south end, the SDEIS accurately describes the transit priority lanes on SR-99 between Spokane and King Streets. However, the document needs to more clearly describe the planned transit pathways between the new south portal ramps to surface Alaskan Way and the 3rd Avenue transit corridor via Main and Washington Streets, or an alternative east-west connection. This description needs to address both the interim period immediately following completion of the bored tunnel while the central waterfront project is still under construction and surface Alaskan Way is not yet open to traffic, as well as the permanent pathway when the project is fully complete. The SDEIS document should note that this permanent transit pathway is part of the bored tunnel project.

At the north portal we have reached agreement with the State and City on new transit priority lanes, but these lanes are not accurately described in the SDEIS. The SDEIS document should include discussion of transit lanes in both directions between Denny Way and Harrison Street to be consistent with current plans for the project. In addition, future transit pathways on SR 99 need to be maintained during the bored tunnel construction and reconstruction of Aurora Avenue surface streets in order to keep transit moving efficiently during construction.

Tolling Considerations

L-004-004 We understand that tolling may be a needed component of the bored tunnel project to close an estimated \$400 million budget gap, and KCDOT remains supportive of tolling on the corridor. However, as identified in the SDEIS tolling will lead to significant diversion of tunnel traffic onto downtown streets causing further delay to transit service. Consequently, it is important to include the impacts of tolling as part of the bored tunnel alternative analysis in chapter 5 of the

L-004-003

Chapter 5 of the Transportation Discipline Report, Appendix C of the Final EIS describes traffic features in the project corridor. In the north portal area, these descriptions include the transit lanes on Aurora Avenue connecting to Wall Street and Third Avenue.

At the south portal, location of transit pathways connecting the SR 99 off-ramp with the Third Avenue transit corridor and Alaskan Way are not included in the project components. This pathway would best be determined by King County Metro with consideration given to the planning that will be carried out by the City of Seattle for the central waterfront.

For the north portal, Appendix C of the Final EIS includes a description of the transit lanes on Aurora Avenue between Harrison Street and Denny Way. During construction, transit operations would be maintained on Aurora Avenue; although, as indicated in the Final EIS, some delays would likely be incurred.

L-004-004

A detailed tolling analysis has been conducted for all 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.

Ms. Freudenstein
December 13, 2010
Page 3

L-004-004 | SDEIS instead of just a stand alone analysis as it is in chapter 9. In addition, mitigation of these impacts to transit needs to be included in the SDEIS tolling analysis.

L-004-005 | King County supports tolling as a transportation demand management tool as well as a revenue source for transportation modes including transit. If tolling is implemented on the corridor we would like transit to be an eligible use of the toll revenue. We look forward to participating in the tolling work group to develop a tolling scenario that optimizes program investments and benefits transit.

KCDOT congratulates WSDOT for advancing the Alaskan Way Viaduct replacement preferred alternative to this stage. We will continue to be an active partner in the project as it moves forward. We hope these comments prove helpful as the SDEIS is finalized. We look forward to participating in the tolling work group and other forums as appropriate to assess project design modifications, transit connections, and to address funding for transit in the corridor as well as other related program elements.

Sincerely,



Harold S. Taniguchi, Director
King County Department of Transportation

Attachments

cc: Chris Arkills, Transportation Policy Advisor, Executive Office
Laurie Brown, Deputy Director, King County Department of Transportation (KCDOT)
Ron Posthuma, Assistant Director, KCDOT
Kevin Desmond, General Manager, Metro Transit Division, KCDOT

L-004-005

Thank you for your comment. 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. We look forward to working with King County DOT on tolling implementation.