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Department of Transportation
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August 15, 2011

Angela Angove
Project Environmental Manager
AWV Replacement Project Office
99 3rd Avenue S., Suite 2424
Seattle, WA 98104-4019

Dear Ms. Angove:

L-002-001

The King County Department of Transportation (KCDOT) is pleased to submit comments on the Final Environmental Impact Statement (FEIS) for the Alaskan Way Viaduct (AWV) Replacement Project. King County has worked closely with the lead and other agencies on this project since its inception. We have provided comments during the process and appreciate the lead agencies' responsiveness to our input.

Our previous comments emphasized the importance of transit as part of the AWV replacement project, the need to provide a variety of transit priority treatments in the project design, and the need to address the project's construction and operational impacts through appropriate mitigation. These comments are part of the project record and will not be restated here.

Our July 2009 scoping comments discussed Metro Transit's (Metro) unprecedented funding gap due to the decline in sales tax revenue, the primary source of funding for transit service. Metro is facing a potential 17 percent cut in transit service that would translate to an annual decrease of over 600,000 service hours. This is true in two years even if the King County Council proceeds with approval of a two-year temporary Congestion Reduction Charge. If this happens, future transit service could be significantly less than the service growth assumptions upon which the FEIS transportation analysis is calculated based on fall 2009 service levels followed by one percent annualized growth. The current anticipated service reduction would undermine the validity of the mode share and other transit-related findings in the FEIS. Only through an ongoing new and sustainable revenue source could Metro achieve financial stability to provide future growth in local and regional transit services. The January 2009 agreement signed by Governor Gregoire, former King County Executive Ron Sims and former Seattle Mayor Greg Nickels clearly stipulates that a one percent Motor Vehicle Excise Tax authority be granted to King County to support the increased service levels, providing for additional throughput of people vis-à-vis the decreased auto capacity of the AWV replacement project. We appreciate the

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FHWA appreciates the input from King County throughout this process. These comments have been addressed in developing the build alternatives, analyzing impacts, and determining mitigation measures. For example, as requested by King County, the Tolled Bored Tunnel Alternative includes transit bypass lanes at the tunnel portals. These bypass lanes provide for priority transit treatment. Additionally, WSDOT is providing more than \$30 million to Metro to enhance transit service through early 2014, and for strategies to encourage the use of transit, teleworking and ridesharing. These funds are intended to mitigate for construction impacts associated with the Alaskan Way Viaduct and Seawall Replacement Program. WSDOT also funded City of Seattle projects to add and upgrade traffic signals in the Elliott Avenue/15th Avenue NW, West Seattle, and south of downtown corridors, and provided funding so Metro could expand its bus monitoring system.

FHWA acknowledges that there continues to be funding challenges for transit and other transportation modes. The King County Council's recent adoption of the licence tab fee (on August 15, 2011) may help to alleviate immediate funding concerns for transit (<http://www.kingcounty.gov/exec/news/release/2011/August/15CRC.aspx>). Continued efforts will be needed at the local level to provide the funding to maintain and improve transit service.

The Final EIS includes an analysis of the operational effects of build alternatives on transit travel times, which are described in Chapter 5, Question 14. The Final EIS includes a commitment to mitigate for operational effects of tolling through the establishment of a Tolling Advisory Committee (see Final EIS Chapter 8, Question 1). FHWA understands transit measures will be considered by the Tolling Advisory Committee. King County will be directly involved in the work of the Tolling Advisory Committee.

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state's stated intention to keep working with King County and other parties seeking this transit replacement funding or some other equivalent authority.

The tolling analysis in the FEIS reveals the extent to which traffic diverted by tolling would congest transit routes, resulting in substantially increased travel times for numerous bus routes, impacts to thousands of daily passengers, and more demand for transit service. Despite such impacts, the mitigation provided by the FEIS is limited to "improvements on state facilities or requiring state funding," with no mention of transit or other local facilities. The Record of Decision must commit a variety of mitigation measures proportionate to the project's impacts that are inclusive, but not limited to, state facilities and state funding. The state and King County were able to reach agreement on a formula for and amount yielded by said formula for transit mitigation during construction for the S. Holgate Street to S. King Street Viaduct Replacement. Likewise, we look forward to working with the state to use the same formula to fund from the AWW replacement project budget transit mitigation during construction of the SR 99 bored tunnel as well as the central waterfront. To date, that has not occurred.

King County looks forward to reviewing the Record of Decision and participating on the Tolling Advisory Committee.

Sincerely,



Harold S. Taniguchi, Director
King County Department of Transportation

Enclosures

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