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December 8, 2010

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

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WSDOT Doc. Control

Dear Ms. Freudenstein:

The purpose of this letter is to provide comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the bored tunnel alternative for replacing the viaduct.

I-035-001

1. The SDEIS is inadequate and incomplete in identifying the effects of tolling and the omission of mitigation measures that could and should be added to the final EIS, to avoid periodic paralysis of north-south traffic to and from northwest Seattle (including Magnolia, Interbay and Ballard). These failures are applicable to two periods: the long-term, beginning in December 2015 with the opening of the tunnel, and the construction period beginning at the same time and ending approximately 3 years later. During this 3 year period the viaduct will be torn down, a "new" Alaskan Way will be constructed east of the existing Alaskan Way, and Alaskan Way will be removed. Depending on the timing of the seawall replacement, large portions of Alaskan Way will be torn up during this period. According to the SDEIS, the width of Alaskan Way will be reduced from South King to Pike Streets. The extent of the reduction is not indicated, Alaskan Way is presently two lanes in each direction. It is frequently congested between South King and Pike Street. There are traffic lights at nearly every intersection. It provides access to the ferry terminal at the foot of Marion Street. Access to and from the ferry terminal is mentioned in the SDEIS, with the bland understatement that "it may take a little longer". There does not appear to be any consideration of the extent of the impact on the access to and from the Colman dock ferry terminal, during either the first phase (2016 -2018) or thereafter, and no consideration of how that might be mitigated. Also ignored in the SDEIS is the environmental impact resulting from the fact that 55-70 hazardous or flammable tanker trucks per day that use the viaduct will not be permitted in the tunnel, and will either use Alaskan Way or I-5. The latter already resembles a glacially moving parking lot during many hours of the day.

The viaduct provides northbound traffic access to downtown Seattle and access for southbound traffic from downtown Seattle to the Duwamish/Harbor Island/SR 519 area,

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Please see the Final EIS for updated analysis and discussion of the Bored Tunnel, the Cut-and-Cover Tunnel Alternative and the Elevated Structure Alternative. Also, the Final EIS Appendix C, Transportation Discipline Report, describes tolled and non-tolled transportation conditions in detail, as well as impacts expected during construction, including expected street closures, impacts to Colman Dock and possible construction mitigation strategies.

Access to the Duwamish/Harbor Island/SR 519 will not change as a result of the proposed project. With the Bored Tunnel Alternative, direct access to downtown Seattle will change. The Columbia Street and Seneca Street ramps will be removed and access will be replaced with the Stadium area ramps to the south.

Please see the Final EIS, Chapter 8, for discussions regarding project mitigation.

I-035-001 Seattle-Tacoma International Airport, and points south. The tunnel will have neither access. The WSDOT estimates that there will be an additional 5,500 vehicles per day on Alaskan Way as a result. In addition, barring an unforeseen circumstance, tolls for using the tunnel will be approved by the Legislature. Based on WSDOT's recommendations the tolls will average \$1.87, \$2.16 or \$2.44 per vehicle, depending on the scenario developed to test the effects of tolling. Use of an average toll is a poor predictor. The proposed toll of \$4.00 during peak periods will cause the greatest diversion of traffic from the tunnel to downtown streets and Alaskan Way. WSDOT's estimate of the diversion of 6-7,000 vehicles per day to Alaskan Way doesn't provide the critical information affecting the capacity of Alaskan Way: the diversion during peak hours to an already congested Alaskan Way. During the 3 year construction period beginning in December 2015, when the viaduct is closed and removed, the lane width of Alaskan Way is reduced, and the new Alaskan Way is being constructed, the SDEIS should address (1) the capacity of Alaskan Way to not only handle the existing traffic but also the estimated additional 12,000 or more vehicles per day, and (2) the capability of the new Alaskan Way, with its proposed 4 lanes in this segment, to provide adequate north-south traffic flow capabilities. The SDEIS offers no mitigation strategies to lessen the environmental impact during the 2016-2018 period. Without mitigation, motorists will be inconvenienced (and pollution increased). More importantly, businesses, including the operations of the Port of Seattle, will be strangled, with the attendant job losses and loss of tax revenues. This deficiency in the SDEIS must be corrected.

I-035-004 2. The SDEIS does not include any consideration of the westerly most portion of the Mercer West Project on the basis that this is a project that compliments all build alternatives. The achilles heal of the Mercer West Project consists of (1) the holding lanes at the intersection of 15th Avenue and West Mercer Way, which at times now exceeds the capacity, and (2) West Mercer Way, which is one lane in each direction. Unless West Mercer Way is widened, it will become a narrow funnel in both directions: westbound traffic from two-way Mercer, and eastbound from 15th/Elliot. Increased traffic on West Mercer Way getting to and from the north portal to the tunnel, from the tear down of the viaduct, and the relocation of Alaskan Way, cannot be ignored in evaluating the environmental impact of the bored tunnel. Also omitted is any consideration of whether the Ballard Rapid Ride transit route using West Mercer Way will add to the congestion, or whether that congestion will significantly affect the ability of Rapid Ride to achieve on time delivery of passengers. A consultant, hired by SDOT, is only now undertaking its work to address possible alternatives for this choke point. Its report will not be made until next April. A widening of West Mercer Way, which borders in part Kinnear Park, will likely be an engineering and cost challenge.

Thank you for your attention to the above comments on the SDEIS.

Very truly yours,



Stephen E. DeForest

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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

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.

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Chapters 3, Alternatives Description, and 6, Construction Effects, of the Final EIS updates the construction activities and durations for each alternative. With the preferred Bored Tunnel Alternative, the configuration of Alaskan Way S. will be designed and constructed by the Central Waterfront Project led by the City of Seattle. Mitigation measures are described in Chapter 8 of the Final EIS.

I-035-004

The West Mercer Project is an independent project being led by the City of Seattle, who is also a co-lead agency for the Alaskan Way Viaduct Replacement Project. The West Mercer Project is considered as part of the cumulative effects of viaduct replacement project. Your detailed comments on the West Mercer Project have been provided to the City.