
From: Dan Schwartz [dpschwartz@gmail.com]
Sent: Sunday, December 12, 2010 2:36 PM
To: AWW SDEIS Comments
Subject: the tunnel is the wrong solution

I-138-001 | A deep-bore tunnel is the wrong solution to the Alaskan Way Viaduct replacement problem. The surface/transit/I-5 hybrid solution examined by DOT and the stakeholder committee in 2008 is a much better solution. To my mind, the issue can be summed up by considering the change from a stated purpose in earlier versions of the EIS of 'mobility' to the current purpose of 'capacity.' The tunnel can only be justified by ignoring many aspects of our regional needs and focusing instead on maintaining a dependence on cars.

I-138-002 | We have seen from this DEIS that the tunnel could not serve roughly 1/3 of the trips that currently use the viaduct because they start or end downtown. We have further seen that, of the remaining 2/3, as many as 50% may not use the tunnel if tolling is implemented at levels needed to secure the funding for the tunnel's construction. This is obviously a huge problem, both from a fiscal responsibility standpoint and from a planning standpoint. If the state has already demonstrated that the hybrid surface/transit solution could serve the needed trips, there is no good reason to incur the extra costs and risks associated with the tunnel. The risks associated with boring are of course well documented, including a high probability of cost overruns (for which funding is again lacking after the state has drawn down a substantial portion of the contingency fund to prevent bidders from dropping out) and possible damage to historic buildings, costs which would have to be covered by taxpayers. In terms of planning, the tunnel does nothing to increase transit usage (funding for this part of the project has been cut, plus transit could not use the tunnel) or reduce dependency on single-occupant vehicles and their associated greenhouse gas emissions. This doesn't make sense for the state, which has stated goals of reducing GHG and VMT.

I-138-003 | The tunnel also represents an affront to the democratic process, and in particular the 2008 stakeholder process. It is clear that the tunnel was decided by powerful interests behind closed doors but this is in no way a sufficient justification for its selection as the best solution to this transportation problem. The EIS process has been similarly flawed and has clearly been prejudiced to favor the tunnel despite previous recommendations for other alternatives (and the fact that the stakeholder group rejected a tunnel option out of hand, precisely because it was too risky and too expensive in comparison to other alternatives). Other viable options are not being given serious consideration within this EIS process, which is a clear violation of the purpose and spirit of the process.

I-138-004 | In summary, the tunnel is a risky, expensive option that fails to provide the best solution to the question of mobility around our region. I hope that the officials considering these comments will not bow to the political forces aiming to push this project forward and will instead work to find the best way to meet our transportation needs.

Thank you,

Dan Schwartz
Seattle resident

I-138-001

Because many people expressed interest in developing and evaluating a surface and transit hybrid, the lead agencies completed additional traffic analysis to confirm the rationale for screening out this concept for further analysis in the EIS. The surface and transit hybrid was considered in the 2010 Supplemental Draft EIS, see pages 53-58. The additional analysis confirmed the rationale for not evaluating this concept further. Details of that traffic analysis were provided in Attachment A of Appendix C, Transportation Discipline Report, to the 2010 Supplemental Draft EIS. In addition, Appendix W, Screening Report, of the Final EIS includes the updated Surface and Transit Scenario Year 2030 Analysis Results.

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.

I-138-002

The analyses regarding how tolls might be implemented as part of the proposed action are preliminary in nature and will be further refined should the state legislature authorize tolls on the SR 99 Bored Tunnel.

The potential effects resulting from these preliminary analyses represent the upper end of implementing tolls on 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 SDOT, the Port of Seattle, and King County, will establish a Tolling Advisory Committee to provide strategies for minimizing diversion impacts.

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.

Additional King County Metro transit service will be provided as part of construction mitigation. Improvements to the speed and reliability of transit service will also be supported by the project and continue to be in place after construction is completed. 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 light rail and commuter rail expansion under Sound Transit 2 and the King County Metro RapidRide bus program. The I-5, Surface, and Transit Hybrid approach was seriously considered, but was rejected because the lead agencies determined it lacked the capacity to serve the long-term needs of the region. The Surface and Transit Scenario Year 2030 Analysis Results is included in Appendix W, Screening Reports, of the Final EIS. Chapter 2 of the Final EIS discusses the alternatives development process and screening analysis.

Although costs are an important part of project planning and decision-making, they are purposely not a major part of the environmental review process. As provided in CFR 1502.23 “For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations.” Overall project costs are included with the project description and are used for the analysis of economic impacts. Greenhouse gas emissions are predicted to increase with the Bored Tunnel Alternative because of the increases in future vehicular volumes and the power needed to operate tunnel operations and lighting systems. Most greenhouse gas emissions with the Bored Tunnel Alternative would come from vehicle emissions. Greenhouse gas effects are explained in Appendix R, Energy Discipline Report.

I-138-003

FHWA, WSDOT, and the City of Seattle have worked diligently throughout the life of this project to provide extensive opportunities for public involvement. This input has been and continues to be invaluable and has shaped the three build alternatives considered in the 2010 Supplemental Draft EIS and the Final EIS. The recommendation provided by Governor Gregoire, former City of Seattle Mayor Nickels, and former King County Executive Ron Sims to replace the viaduct with a bored tunnel reflected the input provided by stakeholders through the 2008 Partnership Process.

FHWA, WSDOT, and the City of Seattle have provided an objective analysis of the proposed build alternatives the environmental documents that support this project. As documented in the 2010 Supplemental Draft EIS and the Final EIS other viable build alternatives evaluated include the Cut-and-Cover Tunnel Alternative and the Elevated Structure Alternatives. Throughout the life of the project, many other alternatives and concepts have been considered, but are not evaluated in this Final EIS because they do not meet the purpose and need of the project.

I-138-004

The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Specifically, compared to the Cut-and-Cover Tunnel and Elevated Structure Alternatives, it avoids substantial closure of SR 99 during construction and it can be built in a shorter period of time than the other two alternatives. Extended closure of SR 99 would be more disruptive to Seattle and the Puget Sound region. Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS provide a more in-depth comparison of trade-offs for the alternatives.