

Janet W. Winans, Ph.D
3837 E. Crockett
Seattle, Washington 98112

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Ron Paananen, AWV Project Manager
Angela Freudenstein
Washington State Department of Transportation
999 Third Avenue, Suite 2424
Seattle, WA 98104

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

Dear Ms. Freudenstein, Mr. Paananen and Mr. Hahn,

I-157-001

This letter is intended to add our voices to those submitting responses about the DRAFT ENVIRONMENTAL IMPACT STATEMENT for the replacement of the Alaskan Way Viaduct. Please consider our comments.

While this letter addresses our interests in the issues about the Deep Bore Tunnel outlined in the DEIS, we want to emphasize our concerns about what seems to be the very rapidly closing discussion about the project itself, now that the Governor has so triumphantly presented the "Winners" of the bidding part of this very complex and lengthy process. It is absolutely essential that there be an open, completely transparent discussion about the concerns that are described in the full environmental impact document.

We know that there are essential legal procedures that must come with the release of this Draft that are critical in the ongoing assessment of the impact that the proposed tunnel will have on critical features in the boring area.

As citizens of Seattle we have worked to be informed about the project, including reading of the Executive Summary of the DEIS. Because we have access to the critiques of others with more expertise than we who have read the entire document, we believe the Executive Summary minimizes very serious issues that demand very careful attention. Certainly, no decisions should be made by those who have read only that Summary.

I-157-002

We are concerned about the potential that Pioneer Square may be irreparably damaged by the tunnel construction; traffic in the entire downtown between I-5 and the waterfront will be disrupted during the construction process but the promised funds for

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FHWA, WSDOT, and the City of Seattle thank you for submitting your comments. FHWA, WSDOT, and the City of Seattle (lead agencies) are committed to continuing the open, transparent public process that we have undertaken since this project first began. The public involvement process for this project have surpassed legal requirements under the National Environmental Policy Act (NEPA) and the State Environmental Policy Act (SEPA). The lead agencies recognize how important this project is to our citizens, taxpayers, and our state and public input has been and will continue to be invaluable to this project.

The Governor has awarded a contract for building a bored tunnel; however, as you state in your letter, the lead agencies cannot build a bored tunnel until the NEPA and SEPA processes are complete.

We appreciate your efforts to stay informed about this project and will respond to your specific comments and concerns about the executive summary in the text that follows.

I-157-002

Effects to Pioneer Square have been carefully considered and described in the Final EIS and its appendices. Additional King County Metro transit service will be provided as part of construction mitigation. While some added travel time would be incurred by buses during construction, transit operations would still be maintained. Potential improvements to the speed and reliability of transit service would also be supported by the completed project. Following construction of this project, transit service enhancements by other agencies 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.

I-157-002 | any extra transit seem to have been used elsewhere, perhaps in the efforts of the tunnel advocates to find willing bidders for the project.

I-157-003 | Perhaps it is reasonable, among experts in the field, to use only a fictitious 2015 Viaduct as the "control" for what the new tunnel will add to the downtown but it seems unreasonable to use such measures as views and air pollution after the Viaduct is demolished as success for the tunnel. Perhaps travel times, with the new traffic patterns learned by drivers during construction, will mean that we will spend only a minute more at one or another intersection (p 18, ESDEIS), but these traffic changes seem to be completely ignored in the public discussions about this project.

I-157-004 | The complete study describes the risks of digging and boring in Pioneer Square (Ch 5, p 126), possible damage to 12 historic structures (Ch 2, p31) and possible collapse or dramatic damage to 2 buildings because of difficulty controlling soil loss or preventing over-excavation or sink holes (Ch6, p142). The Executive Summary calls this "an adverse effect"...that "would be addressed by a Memorandum of Agreement" (ESDEIS, p23). It does not mention that "Mitigation measures to protect the buildings may not prevent the need for demolition to avoid collapse" (Ch 6, p148). This difference in wording and emphasis seems like a very serious misrepresentation of information, considering that most people who do make the effort to understand the environmental impact of this project will believe that the Executive Summary is a fair representation of the risks and costs, much more than financial, to the city and community discovered in the environmental impact analysis.

I-157-005 | We will mention just one more concern about the lack of transparency surrounding this project. The Executive Summary states:
Tolls are not currently proposed for this project and are not included in the assumptions for the Bored Tunnel Alternative. However, tolling options are being considered. . . Projections show 40,000 trips shifting to other facilities [ESDEIS pp15, 30].

The non-tolled tunnel sends 29,000 of the AWV cars and trucks to city streets. The tolled tunnel sends an additional 40,000+ to the city streets. The Bored Tunnel advocates do not describe how even the 29,000 vehicles will be absorbed into downtown traffic beyond saying "the effect of changed traffic patterns would be mitigated through publicity and signage."

As we understand it, tolling is essential to pay for this project but its effects are not included in the description of all the benefits that the Tunnel will bring to the city of Seattle. When you add the choices drivers' whose business is IN downtown Seattle will make when confronted with tolls into the tunnel, which will allow them access TO downtown from 2 instead of 7 "portals," the studies show that only one-third of the traffic currently using the Viaduct will continue to use the Tunnel.

I-157-006 | It seems possible to believe that the purpose of this Tunnel is the rapid routing of the traffic that is passing through Seattle. If that is the case, it seems that the City of Seattle

I-157-003

In addition to a discussion about existing traffic conditions, the Supplemental Draft EIS evaluated and reported traffic effects for conditions in both 2015 and 2030 for the Bored Tunnel Alternative. The Final EIS also analyzes conditions in 2030. For subjects like air quality, the year 2015 and 2030 was evaluated.

I-157-004

The discussion of effects and mitigation for historic structures in Pioneer Square has been updated in the Final EIS and Appendix I, Historic, Cultural, and Archaeological Discipline Report. The Western Building's existing poor structural condition means that it cannot withstand settlement as well as other nearby historic buildings. After studying various options for retrofitting or demolishing the building, and receiving public input, WSDOT determined that a protection plan for the Western Building could be implemented with the Bored Tunnel Alternative. The settlement impacts would be mitigated by:

1. Strengthening the foundation with micro piles and grade beams, or constructing a reinforced concrete wall system, or using a combination of both approaches.
2. Installing epoxy grout and wrap on cracked concrete columns and beams.
3. Constructing a temporary exterior steel frame and interior shoring and bracing.
4. Injecting compensation grout to manage building settlement to less than 0.5 inches.

The steel framing and the interior shoring and bracing would be removed when the risk of settlement diminishes, leaving the exterior appearance of the building approximately the same as it is currently. The work would be reviewed by the Pioneer Square Preservation Board and would be done in compliance with the Secretary of the Interior's Standards for

I-157-006

may pay a very serious price, not just in "cost overruns," that is being terribly ignored in all of the public discussions of the pros and cons of the Alaskan Way Viaduct replacement options. Now the Deep Bored Tunnel is considered the ONLY, Governor decreed, alternative, and the Environmental Impact process seems on fast forward for approval and Let The Digging Begin!

While we certainly recognize that SR99 is a highway that moves vehicles both north and south of the City of Seattle this Draft of the yet to be finalized Environmental Impact Statement describes many other issues than we have listed that make us doubt that the Bored Tunnel is the best option to maintain the through purpose of SR99.

It is absolutely essential that all legal processes continue with due seriousness and transparency and that as many of the potential problems that digging the Tunnel may cause be realistically listed along with the costs to mitigate them delineated, and that all of us confront just how those costs will be funded. All people who use SR 99 must know the actual costs of their convenient use of the highway.

Thank you for your consideration of our concerns.

Drs. Janet and Edgar Winans

Rehabilitation of Historic Buildings (36 CFR 67.6). This work would require tenants to be relocated. The building would be unavailable for 12 to 20 months while it is being reinforced.

The Polson Building is not at risk of collapse or demolition, even though it shares an adjoining wall with the Western Building. The surrounding soil would be stabilized with compaction grouting and, if needed, the basement would be reinforced on the interior.

Buildings and structures (both historic and non-historic) along the alignment have been inspected and evaluated by structural engineers. The potentially affected buildings and the monitoring plan are discussed in Chapter 6 of Appendix I, Historic, Cultural, and Archaeological Discipline Report, of the Final EIS. The construction process includes monitoring of selected buildings and structures 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.

I-157-005

Currently, the Washington State Department of Transportation does not have the authority from the Washington State Legislature to toll SR 99. As legislative action is required to toll this facility, the evaluation of the non-tolled Bored Tunnel Alternative in the 2010 Supplemental Draft EIS accurately reflected the status of the project. However, if the Washington State Legislature decides to use tolling to fund a portion of the project, the potential effects of tolling do need to be evaluated and documented. The possible effects of tolling are analyzed in Final EIS. Please see Chapter 5 and Appendix C, Transportation Discipline Report.

Yes, if the new facility is tolled, traffic diversion is expected. The lead agencies acknowledge that a long-term solution should be sought to

minimize the amount of diverted traffic in order to optimize operation of the transportation network. Strategies for optimization will be developed by the Tolling Advisory Committee (TAC). See Chapter 8, Mitigation, of the Final EIS for more information about the work of the TAC.

I-157-006

The project's purpose and need statement presented in Chapter 1 of the 2010 Supplemental Draft EIS and the Final EIS clearly state the the purpose of the project is to:

- Provide capacity for automobiles, freight, and transit to efficiently move people 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.

The focus of all the proposed build alternatives evaluated in the 2010 Supplemental Draft EIS and the Final EIS is to provide capacity for both to and through movements. There are tradeoffs between the build alternatives as to how to and through capacity is provided. There are also differences among the alternatives as to the types of linkages provided. However, in the case of all three build alternatives capacity to and through Seattle and linkages to and from downtown Seattle are provided.

As documented by the 2010 Supplemental Draft EIS and the Final EIS, the Bored Tunnel Alternative is not the only proposed build alternative. Rather, it is the preferred build alternative. The lead agencies will continue to take NEPA and SEPA requirements seriously and have provided updated project costs and mitigation information in the Final EIS.

The legislation authorizing WSDOT to proceed with the project has a provision that those in Seattle who benefit from the project should be

responsible for cost overruns. WSDOT interprets this as a statement of legislative intent that would need clarification to become operative.