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December 13, 2010

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

This letter provides comments on the draft environmental impact statement (DEIS) for the Alaskan Way Viaduct Replacement Project. The Underground Tour, operated by Bill Speidel Enterprises Inc., has been a steward of and advocate for the Pioneer Square Historic District for nearly five decades. We care deeply about Seattle's first neighborhood, and the incredible historic resource value it represents. We are interested in ensuring, that whatever solution you decide on for viaduct replacement, the streets and character and vitality of our neighborhood are protected, not destroyed.

The following are our concerns with the DEIS.

#### **Adequacy of Review, and Range of Alternatives**

**B-004-001** | When the preferred alternative was announced in January 2009, the package included \$190 million worth of transit investments. Additional transit service was then, and is now, necessary to serve demand for access to and from downtown, since the bored tunnel itself does not. Moreover, the Letter of Agreement (LOA) between the City, County, and State promises funding for this transit service (see pg 258). **Additional transit service should be included** with the bored tunnel alternative, and analyzed for its utility.

**B-004-002** | Further, late in 2008, WSDOT, the City of Seattle, King County and various stakeholders completed an extensive review of multiple options for addressing the stated purpose of the project. That group concluded that there were two acceptable options. One of those options was a three-pronged plan to improve flow on Interstate 5, improve transit, and improve surface streets. That option—designated by your agency as one of the best and most viable options available—has never been analyzed in detail in an EIS. Why not? It is not too late to correct this error.

#### **B-004-001**

The agreement signed by the Governor, County Executive, and Mayor in January 2009 described a program of independent yet complementary projects for replacing the Alaskan Way Viaduct and providing a strategy for overall mobility in Seattle. The State is responsible for replacing the viaduct, the City for the seawall and central waterfront, and the County accepted responsibility for additional RapidRide and express bus service, with some identified as construction mitigation. These future transit service improvements have benefits independent of replacing the Alaskan Way Viaduct. 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.

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 will also work with the County to identify funding sources for the service originally contemplated in the January 2009 agreement.

#### **B-004-002**

As part of the alternatives development process for the project, the Elevated Structure and Transit Hybrid and the I-5, Surface and Transit Hybrid developed through the Partnership Process were considered in the 2010 Supplemental Draft EIS. For reasons discussed on pages 53 through 58 of the 2010 Supplemental Draft EIS, these concepts were screened out as potential build alternatives for further evaluation in the

**B-004-003** | The **importance of the viaduct for local access has been understated** in assumptions, and data presentations, throughout the DEIS's analysis. A primary use of the current viaduct is to access downtown Seattle; 42% of current trips are coming and going to downtown neighborhoods (Ch 4, pg 73). The EIS should identify local mobility and access to downtown as a goal, and evaluate alternatives based on their ability to provide this.

**B-004-004** | **The significant traffic impacts of tolling are not fully described in the analysis** (Ch 9, pg 205). "As currently defined, the Bored Tunnel Alternative does not include tolls." The impact analyses in the entire document, including travel times, traffic volumes, greenhouse gas emissions, and stormwater runoff all assume that there will be no tolling on the project. However, tolling revenue is a necessary part of the basic funding plan, and use of tolling dramatically affects the impacts. Tolling should be included in the modeling throughout the EIS to clarify the impacts.

It is insufficient merely to reprise the State's January 2010 Tolling Study in Chapter 9 without incorporating tolling's impacts throughout the analysis. Without it, this EIS creates an inaccurate depiction of impacts—especially traffic effects on local streets.

#### **Traffic Impacts to Pioneer Square Historic District Streets**

**B-004-005** | Currently, the viaduct offers seven on- and off-ramps to provide access to downtown Seattle neighborhoods, spread from the stadium area to Belltown. The tunnel alternative reduces this number to four on- and off-ramps, and concentrates them all in one location: adjacent to the Pioneer Square Historic District (Ch 4 pg 74). This configuration concentrates in our neighborhood all the traffic going between SR-99 and downtown Seattle.

Without tolling, this DEIS says that 30,000 additional cars will shift to city streets from SR-99 (Ch 2, pg 19). More specific to our neighborhood, this DEIS states that 50,000 cars a day are expected to use the southern interchange ramps (Ch 5, pg 104). If tolling is implemented, as required by the funding plan for the project, an *additional* 40,000 to 45,000 cars are expected to divert to city streets. It is unclear how many of these cars are likely to use this interchange.

The Pioneer Square Historic District is already inundated with car traffic during events at Safeco Field, the WaMu Theater, and Qwest Field on 205 days a year, with 105 of these happening during rush hour. How will this additional traffic generated by the southern interchange, at least 50,000 trips a day and perhaps much more, be accommodated on event days?

**B-004-006** | After analyzing the traffic impacts on surface streets that would result from tolling, the conclusion is, "These effects would not be acceptable as part of a long term tolling solution" (Ch 9, pg 214). No alternative is suggested other than to say another alternative is needed.

After analyzing tolling impacts on transit riders (Ch 9, pg 215) the conclusion again is, "These effects would not be acceptable as part of a long term tolling solution."

EIS. As documented on page 53 of the 2010 Supplemental Draft EIS, "None of the concepts met all of the screening criteria. The screening criteria were applied by first determining if a proposed design concept could meet the first element of the project purpose - providing a facility that meets current seismic safety standards. All of the design concepts considered met this criterion and were advanced. Concepts that satisfied the seismic design criterion were evaluated against the screening criteria for the remaining elements of the project purpose. In this stage of the screening analysis, design concepts were not required to achieve each of the project purposes. Instead, they were evaluated based on their overall ability to achieve the project purposes. In cases where two similar concepts were being considered, the concept that better satisfied the screening criteria was advanced and the other was eliminated. In cases where a concept had substantial deficiencies in its ability to achieve one or more elements of the project purpose, such that it would substantially compromise mobility, or if that concept had other major drawbacks, such as severe impacts on the local community, the concept was designated as unreasonable and was eliminated."

As the quoted sections of the 2010 Supplemental Draft EIS describe, the criteria for mobility and capacity were not more heavily weighted than the other screening criteria. The I-5, Surface and Transit Hybrid was screened out because the lead agencies found it had greater effects to overall mobility than was assumed in the Partnership Process analysis. For example, in 2030 the Surface and Transit Hybrid had approximately 35,000 more vehicles per day on I-5 than the other three alternatives. The analysis completed for the Partnership Process focused on transportation conditions in the year 2015, and the analysis presented in the 2010 Supplemental Draft EIS focused on the project's design year of 2030. For reasons identified in the 2010 Supplemental Draft EIS, analyzing the I-5, Surface and Transit Hybrid in 2030 showed this concept did not meet the project's purpose and validated the rationale for not evaluating this concept further. Details of that traffic analysis were

**B-004-007** | The existing street grid in this area is not well connected, and there are not many viable routes. Some of the streets are narrow, historic, physically fragile, and pedestrian oriented, and not suitable for use as access roads to a highway interchange.

This EIS must describe in more detail the traffic volumes that are expected on specific streets around the southern interchange, both without tolling and with it. How many cars will use Alaskan Way, First Ave, Second Ave, and Fourth Ave? What revisions will WSDOT make to these streets to make room for all these cars, and for pedestrian traffic crossing First Ave? What are the impacts, in detail, of these solutions? How will this affect the pedestrian character of the streets? How will it affect on-street parking and the viability of retail? Are these historic streets, built on fill and supported by 100-year-old areaways and retaining walls, physically capable of carrying this much traffic? How will the proposed changes to these streets affect the viability of travel by bicycle? If the impacts to transit are unacceptable, what alternative solution or mitigation is being offered?

**B-004-008** | In general, what alternatives or mitigation are being considered—such as additional transit, or routing away from the Historic District and improvements to pedestrian rights of way—to minimize the untenable impact of adding at least 50,000 vehicles, and perhaps more (if the project is tolled), to our local streets? And what impacts do these possible solutions bring?

Concerns about the significant impacts of heavy concentrations of traffic on Pioneer Square streets caused by the preferred alternative were raised by neighborhood stewards over a year ago. It is misleading for this draft EIS to not provide decision makers more detail on these problems, and possible solutions, within this draft EIS.

#### **Physical Risks to Historic Resources**

**B-004-009** | Boring a tunnel next to our historic district, with its historic buildings, fragile and brittle infrastructure, high water table, and unstable soils, is a steep engineering challenge. This EIS describes the risks of digging and boring in this location (Ch 5, pg 126), possible damage to 12 historic structures (Ch 2, pg 31), and possible collapse or dramatic damage to two buildings during construction (Ch 6, pg 142), and mentions measures to protect structures. But many important issues remain unaddressed.

What damage could soil settlement from tunnel boring cause, specifically? Will residents and users of those buildings be at risk of harm? Will Pioneer Square's unique but delicate areaways—its historic Underground—be at risk?

What buildings specifically will be required to have their supporting soil improved with jet grout? What impacts will that have on the use of their Underground portions? What sidewalks will be closed, what streets will be closed, what basements will be altered, what areaways will be temporarily or permanently affected?

Some of the "solutions" proposed actually exacerbate other problems, but these impacts are not disclosed or assessed.

provided in Attachment A of Appendix C to the 2010 Supplemental Draft EIS.

The Final EIS Appendix W, Screening Reports, includes the updated Surface and Transit Scenario Year 2030 Analysis Results. Chapter 2 of the Final EIS discusses the alternatives development process and screening analysis.

#### **B-004-003**

The Final EIS Chapter 1, Introduction, describes the Purpose and Need for the project and one of several purposes is to provide capacity for automobiles, freight, and transit to efficiently move people and goods to and through downtown Seattle. The build alternatives would result in enhanced mobility to activity centers in both the south and north portal areas and beyond, particularly to the SODO commercial and business district and the stadium area. Overall, the infrastructure improvements in the north portal area would improve truck freight mobility and vehicle and pedestrian connections. 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.

#### **B-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. The potential effects resulting from these preliminary analyses represent the conservative 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.

**B-004-010** | Because the water table is quite close to the surface in this neighborhood, there is risk that the solidification of soils—due to tunnel walls, retained cuts at the portals, and the injection of jet grout under buildings—might alter natural water flows, create a water barrier, and cause water to back up (Ch 5, pg 127). What exactly is the risk of potentially submerging subsurface structures? Which structures? Will decayed and fragile underground water and sewage infrastructure be at risk of failing? What is the risk of basements flooding? Many of these basements are occupied, either by functioning retail or other business uses. Some are part of the historic Underground, which is a popular visitor attraction, occupied at times by hundreds of visitors. What will WSDOT do to protect against flooding events?

**Duty to Obtain Important Information**

**B-004-011** | SEPA and NEPA require your agencies to identify information gaps and fill them, especially when that information is important to making a reasoned decision. Some of the issues identified in this letter will not be easy to address. But considering the magnitude of the possible impacts, your duty to acquire important information compels you to do the studies necessary to answer these critical questions. State and Federal agencies involved in this project must not make such irrevocable decisions without benefit of the required critical information identified above.

**Process Issues**

This letter has identified many issues that have not been addressed adequately or at all in your draft document, and notes the absence of reasonable alternatives. Including this missing analysis for the first time in the FEIS deprives the community and public agencies of the opportunity to comment on a draft version of this important information. Another draft containing the missing alternative and missing impact analysis should be prepared.

We are deeply troubled by the focus on your preferred alternative before the environmental review process is complete.

When the EIS is complete, decision makers should have a *real* opportunity to choose between alternatives. If one alternative has been developed to a far greater extent than the others, you leave decision makers with little genuine choice—or, at minimum, you skew the choice severely in favor of the more fully developed alternative.

That seems to be precisely the process you are using here. You have spent tens of millions of dollars engineering the tunnel option to the 30% level. You have solicited, received and now awarded a bid for construction of the tunnel. You have taken a host of other actions making it all but impossible for a decision maker to choose any alternative other than the tunnel.

You must move the other alternatives far enough along so that when the FEIS is released decision makers have real options, not simply the option of approving a *fait accompli*.

**Summary**

**B-004-012** | I've been advocating for Pioneer Square for the last 24 years or so. I have participated in legions of projects related to my favorite neighborhood. Today, I'm concerned for Pioneer

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. The 2010 Supplemental Draft EIS evaluated the potential effects of three toll scenarios in Question 6 of Chapter 9. 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. Therefore, the Final EIS evaluates the potential effects of the build alternatives with and without tolls.

**B-004-005**

The function of the downtown ramps at Columbia and Seneca Street will be replaced by new ramps to Alaskan Way at King Street. Traffic analysis indicates that this arrangement will result in comparable or better overall traffic distribution and flow than is experienced with the current Columbia and Seneca Street ramps. This is because the current ramps concentrate traffic to a single, congested location in the central downtown. The relocated ramps would instead allow drivers to diffuse through the street grid using many different paths.

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, including event traffic.

**B-004-006**

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)

**B-004-012** Square's survival. I am asking you, please, to take special care of our beloved historic district, its buildings, streets, areaways and sidewalks, as you make decisions on this project.

Pioneer Square is a beautiful and cherished neighborhood, and has irreplaceable historic value to the city of Seattle. Preserving our lovely thoroughfares has not been easy. Every generation of stewards has devoted significant attention to protecting our streets, whether by saving the majestic plane trees on First Ave or carefully guiding façade renovations or doing the hard work to ensure ferry traffic is routed away from our neighborhood streets.

The risks and harms to Pioneer Square mentioned in this DEIS might truly be overwhelming. The traffic generated—certainly 50,000 cars a day, and likely more with tolling—by placing a massive highway interchange in our neighborhood could ruin our fragile neighborhood and our connection to the new waterfront.

The DEIS acknowledges the traffic impacts are “unacceptable.” It acknowledges that the absence of tunnel entrances and exits in the downtown core, combined with the effects of tolling required by the State’s statutory funding plan, will divert to surface roadways over half the trips which currently use the viaduct. Yet the EIS refuses to disclose the full scope of these impacts and minimizes their adverse effects, treating the increased congestion more like an accounting problem than an assault on the integrity of Pioneer Square. Compounding the problem, the DEIS discusses mitigation measures as if funding were available for them, totally misleading most readers who are not aware that there is no funding available for these measures. The EIS should candidly disclose the likelihood (or not) of funds being available for critical mitigation measures. City and State decision makers deserve immediate clarity on exactly how WSDOT intends to “improve” our local street grid. These “solutions” should be included for analysis in this EIS.

**B-004-013** Two historic buildings might need to be torn down, and twelve others could suffer damage. The flooding risks caused by the project's inability to prevent changes to ground water flows could put some of the over 100,000 annual visitors to the Underground Tour, and the neighborhood, in danger.

It is our collective responsibility to protect the pedestrian environment, streets, and physical fabric of the historic district, including our Underground areaways. Our neighborhood is counting on City and State decision makers to ensure highway-bound traffic is not routed through our streets, to negotiate excellent design for local streets that must be altered, and to secure adequate funding for successful completion. We are counting on the City and State decision makers to ensure the historic buildings and Underground are safe from damage, and Pioneer Square residents and visitors are safe from risks. Pioneer Square must not only survive WSDOT's tunnel project, but emerge on the other side stronger.

Thank you,

Sunny Speidel  
President, CEO  
Bill Speidel Enterprises Inc.

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.

**B-004-007**

Because operational effects of the build alternatives would be substantially better than the Viaduct Closed (No Build Alternative), long-term transportation mitigation measures are not anticipated. However, a number of mitigation measures in place during construction could have benefits over the longer term.

As part of the preferred Bored Tunnel Alternative and related projects, the lead agencies have or will implement several strategies to keep traffic moving during construction. 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. WSDOT will prepare a traffic management plan, which will contain localized traffic mitigation measures. These measures will be developed as construction details are refined. Mitigation measures are described in Chapter 8 of the Final EIS and Chapter 6 of Appendix C, Transportation Discipline Report.

A detailed tolling analysis has been conducted for all alternatives and is described in this Final EIS. Additional detailed analysis of tolling impacts is described in Chapter 7 of Appendix C, Transportation Discipline Report. Chapter 5 of the Final EIS compares conditions on local streets south of S. King Street, between King Street and Denny Way, and north of Denny Way. As part of the Bored Tunnel Alternative and related projects, WSDOT and partner agencies have or will implement several strategies that should reduce the effects of potential diversion.

WSDOT funded Intelligent Transportation System (ITS) investments provide improved signal operations and travel time information on SR 99 and city streets such as 15th Avenue NW that are likely to see increased volumes due to SR 99 construction activities. These investments will have lasting value. Supplemental transit services and transportation demand management have also been implemented with assistance from the City of Seattle and King County, and these strategies can form the blueprint for future strategies.

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 monitor and provide input to this analytical and decision-making process, including identification of strategies considered for alleviating diversion impacts.

**B-004-008**

Because operational effects of the build alternatives would be substantially better than the Viaduct Closed (No Build Alternative), long-term transportation mitigation measures are not anticipated. However, a number of mitigation measures in place during construction could have benefits over the longer term. Refer to Chapter 8 Mitigation in the Final EIS for details.

As part of the Bored Tunnel project and related projects, WSDOT and partner agencies have or will implement several strategies to keep traffic moving. 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. WSDOT funded Intelligent Transportation System (ITS) investments provide improved signal operations and travel time information on SR 99 and city streets such as 15th Avenue NW that are likely to see increased volumes due to SR 99 construction activities. These investments will have lasting value. Supplemental transit services and transportation demand management have also been implemented with assistance from the City of Seattle and King County, and these strategies can form the blueprint for future strategies.

**B-004-009**

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. Buildings and structures (both historic and non-historic) along the alignment have been inspected and evaluated by structural engineers. The construction process includes extensive monitoring of each building and structure 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*.

The Bored Tunnel alignment is some distance from Pioneer Square's areaways and no impacts on them are anticipated. The areaways are included in the monitoring program; instrumentation has already been installed in First Avenue areaways. The areaways are discussed in more detail in Chapters 4 and 6 of Appendix I of the Final EIS.

**B-004-010**

Measures that can be employed to mitigate the risk of groundwater mounding behind tunnel walls or ground improved areas are outlined

in Appendix P, Earth Discipline Report, of the Final EIS. The level of detail provided in the Earth Discipline Report is appropriate for environmental review purposes. The risk of groundwater mounding and associated mitigation will be further evaluated during final design of the project. Design guidelines will provide for mitigation of groundwater mounding to within existing tidal fluctuations.

**B-004-011**

Through the course of project development, all reasonable alternatives have been evaluated as required by NEPA and SEPA regulations. Chapter 2 of this Final EIS and Chapter 3 of the 2010 Supplemental Draft EIS provide substantial information on alternatives development and how the preferred alternative was identified.

Issues previously addressed in this letter are addressed in preceding comment responses.

**B-004-012**

The lead agencies are well aware of the potential impacts to the Pioneer Square area and are committed to reducing or mitigating them to the extent practical. Mitigation costs have consistently been included in overall project costs. WSDOT and the City of Seattle will continue to work closely with the Pioneer Square community and others who may be affected by the project as planning continues and throughout construction.

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.

WSDOT funded Intelligent Transportation System (ITS) investments provide improved signal operations and travel time information on SR 99 and city streets such as 15th Avenue NW that are likely to see increased volumes due to SR 99 construction activities. These investments will have lasting value. Supplemental transit services and transportation demand management have also been implemented with assistance from the City of Seattle and King County, and these strategies can form the blueprint for future strategies.

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.

**B-004-013**

There are no longer any historic buildings expected to be torn down with the preferred Bored Tunnel Alternative. WSDOT has defined a program of protective measures for the Western Building that would protect the building by constructing structural reinforcements and bracing for the interior and exterior of the building. The building would be unavailable for approximately 12 to 20 months during the construction period.

Because traffic in Pioneer Square is controlled by signals, it is not anticipated that the increased traffic volume will affect the pedestrian character nor will it make it more difficult to walk to shops or

restaurants. Pioneer Square has historically been an active place with a high volume of traffic. Analysis of traffic patterns for vehicles accessing ramps to and from SR 99 in the stadium area show that vehicles would disperse onto several streets such as S. Royal Brougham Way, Alaskan Way, First Avenue, Fourth Avenue, etc.

Please see the Final EIS Appendix C, Transportation Discipline Report for the transportation analysis. The Bored Tunnel alignment is some distance from Pioneer Square's areaways and no impacts on them are anticipated. The areaways are included in the monitoring program; instrumentation has already been installed in First Avenue areaways. The areaways are discussed in more detail in Chapters 4 and 6 of the Final EIS Appendix I, Historic, Cultural, and Archaeological Discipline Report.