

December 13, 2010

Angela Freudenstein  
Alaskan Way Viaduct Replacement Project Office  
999 Third Ave., Ste. 2424  
Seattle, WA 98104-4019

Dear Ms. Freudenstein:

The Ballard District Council appreciates an opportunity to comment on WSDOT's Supplemental DEIS for the Seattle Deep Bored Tunnel project. We feel strongly that this project will have a substantial affect on the lives and livelihoods for those of us in Ballard during the estimated five year construction period. After the tunnel opens and the viaduct is removed, the project will dramatically alter how this community will access downtown Seattle/central waterfront destinations and will forever change how we navigate virtually every traffic corridor in Seattle.

In our review, we identified the following concerns with the analysis in the SDEIS:

**C-024-001**

1. The impact of the bored tunnel alternative on traffic movement between Ballard, downtown Seattle and beyond has been has not been analyzed in depth. Further analysis of impacts on freight mobility and other motorized vehicles on I-5, Alaskan Way, various truck routes, and east/west connectors between the waterfront and I-5 (such as Mercer Street) would be helpful, particularly focusing on the relative benefits of the mitigation projects and whether they can truly be coordinated. Without such further information and analysis, we believe that there is insufficient evidence in the SDEIS to provide a realistic idea of the impacts of construction to the potential users of the revised road transportation system. We understand that this item is addressed more specifically in comments discussing freight mobility impacts that have been submitted by the Ballard Interbay North Manufacturing Industrial Center (BINMIC), the Seattle Marine Business Coalition (SMBC) and the North Seattle Industrial Association (NSIA).

**C-024-002**

2. The SDEIS is insufficient because it does not include adequate mitigation plans that mitigate impacts or effects from tolling. This deficiency makes it difficult to comment on impacts identified as a result of tolling. The potential diversion of traffic from SR 99 to I-5 and Seattle surface streets (as a result of tolling) is a significant impact and needs to be better addressed and potentially mitigated.

**C-024-003**

3. The SDEIS does not attempt to quantify economic impacts that will occur due to travel delays due to reduced freight mobility through this area. (see comments 1 and 2 above). These could result in profound impacts on businesses in Ballard and other areas, but because it was not analyzed, it makes it difficult to comment on impacts. This also appears to be a deficiency in the SDEIS.

*Member Organizations*

15<sup>th</sup> Ave NW Assn • 36<sup>th</sup> District Demos • 36<sup>th</sup> District Green Party • 36<sup>th</sup> District Republicans • Ballard Chamber of Commerce • Ballard High School PTSA • Ballard Historical Society  
Ballard Landmark Residents Assn • Ballard Northwest Senior Center • Ballard Rotary • Ballard Place Condominium Assn • Canal Station Condominium Assn • Crown Hill Business Assn  
Crown Hill Neighborhood Assn • East Ballard Community Assn • Friends of Burke Gliman Trail • Groundswell NW • Nordic Heritage Museum  
North Beach Elementary PTA • North Seattle Industrial Assn • Norwegian Commercial Club • Olympic Manor Community Club • Seaview Neighborhood Assn • Shisholee Liveaboard Assn  
Sunset Hill Community Assn • Sunset West Condominium Assn • Sustainable Ballard • Whittier Heights Community Council

**C-024-001**

Please see Chapters 5 (Permanent Effects) and 6 (Construction Effects) in the Final EIS as well as Appendix C, Transportation Discipline Report, for a discussion of traffic effects. Chapter 8 of the Final EIS presents potential mitigation measures and strategies. WSDOT will prepare a traffic management plan, which will contain localized traffic mitigation measures. These measures will be developed as construction details are refined.

**C-024-002**

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.

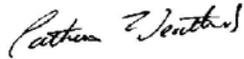
As part of the Bored Tunnel project and related projects, WSDOT and partner agencies have or will implement several strategies that should

C-024-004

4. The SDEIS fails to describe a specific plan for detouring traffic and how that detour will be mitigated during the time from when the existing viaduct is removed to when traffic on the new surface Alaska Way is established. It is critical that WSDOT develop a traffic management plan so that a logical and efficient flow of traffic can be maintained for all modes of travel including commercial, maritime, industrial, freight, commute and residential traffics to and from Northwest Seattle during this period. It is our belief that that much of the traffic originating in Northwest Seattle will be unable to or will choose not to travel the corridor via the tunnel and that this impact needs to be addressed and mitigated.

We are grateful for the opportunity to help determine how this project will be of maximum benefit while doing the least harm to Ballard and all of Seattle. We look forward to your further analysis of the deficiencies we have identified and hope that we can be part of a mutual discussion to consider reasonable mitigations and their funding.

Respectfully,



Catherine Weatbrook, President

Cc: Mayor Michael McGinn  
All Members – Seattle City Council  
Larry Phillips, King County Council District 4  
Bill Bryant, President, Seattle Port Commission  
Delegation – 36<sup>th</sup> State Legislative District

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.

#### C-024-003

The economic effects to freight were described in the 2010 Supplemental Draft EIS and Appendix L, Economics Discipline Report. Travel time information is a more useful measure as the cost per minute of travel will vary greatly for different freight users. Please refer to the Final EIS Chapter 5, Permanent Effects, for an updated discussion of freight and economic effects.

#### C-024-004

Overall construction impacts for each of the alternatives were documented in Final EIS Appendix C, Transportation Discipline Report. For environmental documentation purposes, the most constrained stage of construction for traffic (other than the short closures of SR 99) was analyzed quantitatively while the overall construction activities were described qualitatively. During the viaduct demolition phase of the

project, standard maintenance of traffic during construction plans would be developed, communicated with the general public, and implemented.