



December 13, 2010

Paula J. Hammond  
Secretary of Transportation  
Washington State Department of Transportation  
P.O. Box 47316  
Olympia, WA 98504-7316

Re: Additional Alaskan Way Viaduct Replacement Project Supplemental Draft Environmental Impact Statement Review

Dear Secretary Hammond:

The public comment period for the Alaskan Way Viaduct Replacement Project (AWVRP) Supplemental Draft Environmental Impact Statement (SDEIS) review ends on December 13, 2010. As you are well aware, the primary purpose of this SDEIS is to bring the Bored Tunnel Alternative to a level of analysis comparable to the other alternatives studied in the DEIS in 2004 and first supplemental in 2006. As a co-lead with the Washington State Department of Transportation (WSDOT) for the SDEIS, the City has commented on the methodology used in the SDEIS analysis and on the preliminary draft document as it has been developed. In addition to this early and frequent involvement, City departments have summarized the impacts to the City of the Bored Tunnel Alternative again.

City departments have identified eight primary concerns with the SDEIS that should be addressed in the Final Environmental Impact Statement (FEIS), below. Additional detailed comments from each department are attached.

#### Impacts Related to Tolling

The State's budget assumes that \$400 million will be derived from tolling the Bored Tunnel Alternative. Analysis of tolling to date indicates that a significant amount of traffic will divert to City streets in the vicinity of the portals, on Alaskan Way along the redeveloped Central Waterfront and throughout the downtown. Additional analysis of tolls is needed in the FEIS, including analysis for both 2015 and 2030, as well as with the full Alaskan Way Viaduct Replacement Program. This analysis needs to identify measures to mitigate the effects of diversion and the funding needed for mitigation.

#### Impacts Related to Settlement

Settlement near the surface along the bored tunnel alignment could cause damage to private buildings, utilities, City streets and other public infrastructure. The FEIS should more carefully catalogue both the primary and secondary impacts of settlement to the City. In addition, the City and WSDOT have agreed



to mitigation measures in the pending project MOAs between SCL, SPU, SDOT and WSDOT. Those mitigation measures should be incorporated into the FEIS.

#### Impacts Related to Ground Stabilization Measures

Soil improvements and stabilizing measures may be needed along the bored tunnel alignment to protect existing structures and utilities from settlement and to strengthen existing soil. WSDOT should include a more detailed evaluation in the FEIS of the cumulative effects of groundwater mounding due to these potential soil improvements and cut-and-cover tunnel sections. This evaluation should include analysis of the potential for any structures to be permanently impacted by the change in water flow so that pumping, addition of deep foundations to resist uplift, or other permanent measures might be needed.

#### Impacts to Traffic During Construction

Bored Tunnel Alternative construction is projected to limit access, including transit access, to downtown at the north and south portal areas and across Aurora Avenue N in the north portal area, as well limit travel through downtown on SR 99 because of temporary lane reductions. These changes in traffic patterns are projected to have a particular impact during events and peak travel periods. The FEIS should identify mitigation measures to help keep traffic moving during construction such as expand Intelligent Transportation System and traveler information programs to manage event and other traffic.

#### Greenhouse Gas Emission-Reduction Targets

Because the State and City have adopted or are considering adopting emissions reduction goals, rather than strictly regulated targets, the environmental review of the project is not technically required to take them into account. However, the AWVRP is one of only a few major transportation projects that have the potential to help the City and State reach these emissions reduction goals. The SDEIS analysis concludes that the Bored Tunnel Alternative will not help us move toward the State's or the City's goals for carbon-neutrality.

#### Climate Change Adaptation

The potential impacts of climate change do not appear to have been considered in the SDEIS. These future impacts include sea level rise, precipitation and stormwater changes, and temperature increases. Any long-term infrastructure project should carefully consider scientific models for potential impacts of climate change in Seattle and the project should be designed to adapt to those impacts.

#### Project Funding

The State capped its contribution to the AWVRP at \$2.8 billion dollars. The Port of Seattle has pledged to contribute \$300 million for a total of \$3.1 billion. The contingencies set aside in this budget may be too low, and there is little included in the budget for mitigation. The potential impacts of the project running over budget or the Port of Seattle not providing the \$300 million needed for the project are not addressed. This is a significant concern to the City of Seattle, as we can only assume that elements

important to the City, such as the street grid connections at the tunnel portals or the new Alaskan Way surface street, would be the first to be eliminated from the project. We believe that the EIS should identify and examine the potential impacts of the project if significant elements are underfunded. In addition, we remain concerned about the legislature's stated intent that all costs over the \$2.8 allocated by the State and \$300 million, if provided by the Port of Seattle, would be borne by Seattle-area property owners.


#### Alternatives to the Bored Tunnel

Finally, while most of the stakeholder advisory committee members participating in the 2008 collaborative process supported a recommendation to move forward with the bored tunnel, many of them also recommended that the I-5, Surface, and Transit option be analyzed further as either their first or second choice. Unfortunately, the I-5, Surface, and Transit Alternative was eliminated from further consideration in the SDEIS. As a result, there is no affordable viaduct replacement alternative if the bored tunnel is abandoned due to cost overruns or other construction-related problems.

I look forward to the coordination of your staff at WSDOT with SDOT and other City departments to ensure that these concerns, and the more detailed comments attached, are addressed in the development and review of the FEIS.

Sincerely,



 Peter Hahn, Director  
Seattle Department of Transportation

Cc: Ron Paananen, Alaskan Way Viaduct Replacement Program Administrator  
Robert Powers, Deputy Director, Seattle Department of Transportation  
Seattle City Councilmembers

