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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**

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.

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.

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.

**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**

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?

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."

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?

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**

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.

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**

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**

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

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.

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.