

September 21, 2006

Dear Ms. Kate Stenberg,

Thank you for the opportunity to contribute to this important decision for Seattle's future through responding to the Alaskan Way Viaduct and Seawall Replacement supplemental draft EIS.

C-051-001

We at the People's Waterfront Coalition urge you to include a range of lower-cost and more environmentally friendly choices in the supplemental draft EIS. The purpose of the AWW / Seawall replacement project as initially defined was to "provide a transportation facility and seawall with improved earthquake resistance that maintains or improves mobility and accessibility for people and goods along the existing Alaskan Way Viaduct Corridor."

The purpose and need statement does not refer to a specific number of vehicles or passengers but to the overall transportation functions in the corridor. It seems the phrase "maintains or improves mobility and accessibility" was deliberately chosen so as to allow consideration of a broad range of facility types and mix of modes among the alternatives.

C-051-002

We urge you to look more broadly at a range of possible options to provide mobility to people and freight, from a smaller tunnel to a Transit + Streets proposal that invests in transit and enhancing the surface street network instead of a new highway segment. We urge you to creatively consider all the various types of capacity that may be employed to provide mobility in this corridor – on city streets, new light rail, new bus rapid transit, pedestrian ferries, new streetcars, and increased service on existing transit.

The arbitrary limitation imposed by the legislature on maintaining vehicle capacity on a single facility is itself causing serious problems:

- o the project costs are too high relative to funding available
- o extended megaproject construction imposes too much hardship on existing businesses in one of Seattle's main economic centers
- o encouraging auto usage with more car capacity instead of mode shift runs counter to our shared commitment to reduce carbon emissions
- o pouring millions of tons of concrete along the shoreline is detrimental to the marine ecology of Elliott Bay, however you try to mitigate it.

Because of these shortcomings, we believe neither the two alternatives carried forward in the draft EIS as preferred alternatives serve the mobility function in an environmentally and fiscally responsible way.

C-051-003

Second, we also urge you to broaden the range of measures used to calculate economic impacts of this decision. There is enough attention paid to initial capital costs and the cost of congestion, but these measures are insignificant relative to the long-term effects on Seattle's economic viability. Given its economic and civic potential, this is perhaps Seattle's most

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FHWA, WSDOT, and the City of Seattle agree (although "traffic safety" was omitted in your quote of the purpose statement). The project's purpose is fundamental for all alternatives. The Surface and Bypass Tunnel Alternatives were eliminated, and a no-replacement alternative is not acceptable, because they do not fulfill the purpose of the project.

C-051-002

The lead agencies appreciate receiving your comments and recognize your concerns related to costs, transit, and potential construction effects to businesses and natural resources. The Final EIS Chapter 2, Alternatives Development, describes the history of the project, which included screening 76 viaduct replacement concepts and seven seawall concepts which were packaged into the five build alternatives evaluated in the 2004 Draft EIS. This chapter also addresses development of the I-5, Surface, and Transit Hybrid. After the purpose and need statement was updated in 2009, design concepts were reevaluated and screened to determine the alternatives to be evaluated in the 2010 Supplemental Draft EIS. The Surface and Transit Hybrid concept was screened out because the lead agencies determined it lacked the capacity to serve the long-term needs of the region and it does not meet the project's purpose and need to provide capacity to and through downtown Seattle.

C-051-003

The economic analysis in the Final EIS accounts for those impacts and benefits that are under the direct control of the project. Indirect and secondary impacts and benefits are identified as they can be reasonably tied to a general project activity. Expanding the analysis to address the economic vitality of the City of Seattle would be speculative and any conclusions that would be drawn would be subject to forces beyond the control of this project.

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important and valuable public land. It is necessary to compare how the various options for this infrastructure investment measure up against future goals as defined by Seattle's Comprehensive Plan: sustaining a robust economy, supporting compact development, reducing car dependence, offering high quality of life and urban amenities for residential growth, and continuing to attract and retain employers. We recommend you measure these effects for the range of options:

- o Expected development potential and real estate value
- o Tax revenue generated for the City (sales, business, and property taxes), including when revenue capture begins
- o The viability of existing business to stay afloat and building occupancy rates during expected construction duration
- o The future transportation cost burden per household
- o The quality of life impacts of reclaiming the waterfront for other uses, and its effect on the health of the tourist trade, ability to attract employers, etc.
- o The number of expected car trips and collective emissions produced

For City and State leaders to make an informed decision, the range of lower-cost choices should be expanded and a broader set of economic and environmental measures should be assessed.

Thank you.

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The purpose and need of this project are not defined as meeting the goals of Seattle's Comprehensive Plan. Appendix G, Land Use Discipline Report, of the Final EIS evaluated how the project would comply with the Seattle Comprehensive Plan's goals. However, the project is limited in its regional economic effect--replacing an existing road with a new road that maintains or improves mobility and accessibility--after construction is completed.

Some of the indirect economic impacts and benefits that are requested to be analyzed are beyond the control of the project, including expected development potential and real estate value, the future transportation cost burden per household, and the quality of life impacts. The economic analysis addressed City of Seattle and King County revenue generated/lost by the project (parking meters, property tax base, and sales tax) that can be tied to elements under the direct control of the project. The economic analysis also addressed the impacts to businesses during construction, especially to those businesses in business districts of special concern (Central Waterfront and Pioneer Square); however, the analysis did not analyze whether a particular business would thrive, fail, or just survive, as the performance of an individual business is beyond the control of the project.

Appendix M, Air Quality Discipline Report, of the Final EIS analyzed vehicle trips and their emissions.