Puget Sound Regional Council
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AWVSP Team Office

May 28, 2004

Allison Ray
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104

RE: Alaskan Way Viaduct and Seawall Draft Environmental Impact Statement

Dear Ms. Ray:

The Puget Sound Regional Council appreciates the opportunity to comment on the Alaskan Way Viaduct and Seawall Replacement Project Draft Environmental Impact Statement (DEIS). The project represents a significant step toward implementing the region's long-range growth management, economic, and transportation strategy, VISION 2020, and the Metropolitan Transportation Plan, Destination 2030, through the preservation of a key transportation corridor and the enhancement of one of the region's major urban centers.

The first portion of this letter provides comments on the DEIS. The comments primarily concern regionally significant land use and transportation issues. The second portion of the letter summarizes the process and steps to be taken to advance the Alaskan Way Viaduct and Seawall Replacement project from a Candidate project to an Approved project in Destination 2030. This is a necessary step before purchasing right-of-way and initiating the construction of facilities.

Destination 2030, the long-range regional transportation plan, includes and generally describes the preservation needs in the Alaskan Way Viaduct corridor. The project, as currently described in Destination 2030, is based on the Washington State DOT's direction to the Regional Council at the time of plan development.

However, in order for the project to be fully incorporated into Destination 2030, the project sponsor will need to take steps to advance the project from its current status of "candidate project" to "approved project." Also, once the FEIS is complete for the project, the sponsors should submit a revised project description to be used in refining, or amending the current project description in Destination 2030. This will update the information in the regional plan and provide consistency with the decisions identified in the FEIS.

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Part 1: Comments on the DEIS

Regional Policy Context

As you know, we have a broad vision for the region's future, called VISION 2020. It's a coordinated, long-range vision that balances competing interests, and lays out a growth management, economic, and transportation strategy. A key strategy of VISION 2020 is to focus growth in urban centers. These are locations that offer transportation, housing, employment, shopping, services, and amenities choices for residents and visitors. VISION 2020 describes the community space objectives for centers in the following manner "*central gathering places and open spaces, such as parks, plazas and landscaped areas, are included and located to be accessible and complement other land uses.*" (p. 85)

We can see VISION 2020 taking shape on the ground through the development of urban centers and the region's incremental steps to link them with a multi-modal transportation system. If VISION 2020 is to continue to be successfully implemented, the responsible implementing agencies must define and address problems in a comprehensive manner and look for creative, innovative solutions. Lead agencies need to identify solutions that address the wide range of interests and objectives that are often embodied in complex urban projects.

VISION 2020 attempts to point the way with policies such as:

- RG – 1.4. "*Promote design that preserves community character and livability, creates lively and people-oriented areas, and supports transit, pedestrian and bicycle access.*"
- RO – 6.1. "*Conserve and enhance the region's natural resources and environmental amenities while planning for and accommodating sustainable growth.*"
- *RE –* 7 "*Foster economic opportunity and stability, promote economic well-being, and encourage economic vitality and family wage jobs while managing growth. Support effective and efficient mobility for people, freight, and goods that is consistent with the region's growth and transportation strategy.*"
- RE – 7.7. "*Support investments in community services, infrastructure and amenities that promote sustainable economic activity within centers.*" The economic strategy goes on to stress "*the importance of enhancing the viability and sustainability of centers and compact communities through the provision of adequate housing and employment opportunities, investment in services and*

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Vision 2020 has been updated since the Draft EIS. FHWA, WSDOT, and the City of Seattle continue to strive to develop and design the project in a manner consistent with PSRC's updated plan *Transportation 2040* policies and design guidelines. Thank you for your comments, specifically regarding the Draft EIS. The lead agencies recognize the opportunity we have to redefine the waterfront and the SR 99 corridor.

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amenities that promote economic activity, and development of a efficient transportation system."

- RT – 8.3 *"Maintain and preserve the existing urban and rural transportation systems in a safe and usable state. Give high priority to preservation and rehabilitation projects which increase effective multimodal and intermodal accessibility, and serve to enhance historic, scenic, recreational, and/or cultural resources."*

Destination 2030, the Metropolitan Transportation Plan, also provides guidance to the Viaduct Project. *Destination 2030* states the following.

> *"Transportation improvements and programs must be focused on establishing a more balanced transportation system, shifting emphasis from movement of vehicles to movement of people and goods. A balanced system provides travel options that include choices for private vehicles, public transit, ridesharing, walking, biking, and various freight modes."* (D2030 page 4)

Destination 2030 also contains 10 physical design guidelines (p. 37). *"The guidelines are intended to advance fundamental design principles and site development characteristics that can serve as a starting point to achieving successful and mutually supportive connections between land use and transportation."* The following three guidelines are particularly relevant to the Viaduct project:

- #3 – *"Link neighborhoods, connect streets, sidewalks, and trails."*
- #6 – *"Design for pedestrians and bicycles."*
- #7 - *"Provide usable open spaces for the public."*

It is through this policy lens that we offer the following comments on the information that is contained in the DEIS.

Document Format

The Alaskan Way Viaduct and Seawall Replacement Project Draft Environmental Impact Statement (DEIS) summary document is a very readable and accessible document. The innovative design and discussion format is to be applauded.

Urban Context

This project represents a rare opportunity to design a solution that recognizes this land as a unique resource in the region's largest urban center. Once the project is completed, we will have to live with the results for many years to come. The project needs to make maximum use of the opportunity.

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The purpose and need statement in the DEIS reflects the expectation that the project would largely be a replacement, or corridor preservation project. Consistent with the purpose and need statement, the build alternatives will improve facility access and egress, bring facilities up to current design standards and improve connections to other regional transportation facilities, such as SR 519.

This project has the potential to greatly enhance the character and livability of downtown Seattle. The alternative analysis is focused, however, on the motorized vehicle capacity and seawall replacement issues and provides only limited assessment of the many other functions that take place on this important land. While providing urban design and development direction may be outside the scope of review, we believe that the EIS should explain how the analysis of alternatives reflects the wide range of interests and functions associated with this urban land use setting. This is supported in the goals and objectives section following the purpose and need statement under the heading "Seattle's Plans for the Downtown Waterfront" (page 168). While addressing alternative ways to meet the transportation objectives for the area, the EIS should address how the alternatives help to accomplish the other needs and objectives. For example, how can this project physically and visually reconnect the waterfront to the rest of downtown, add open space and public amenities, provide increased opportunities for housing and mixed use developments, strengthen the attractiveness and unique characteristics of the area for tourism, enhance shoreline habitat?

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Corridor Improvements

It appears that some of the build alternatives may add considerable capacity within the corridor, particularly by adding lanes via the surface treatments. The EIS should contain a descriptive summary of vehicle capacity measures (such as total lane miles within the study area) for the existing facility and for each of the build alternatives. Ultimately, if the project were to evolve into a broader examination of mobility improvements in the defined corridor, as opposed to a roadway preservation project, additional strategies might warrant further consideration, such as: the addition of HOV lanes, improvements that could be done to downtown streets and connections to better carry north/south traffic, and investments in travel demand strategies in the corridor.

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Parallel Improvements

No alternative examines major operational improvement strategies for parallel surface facilities through downtown Seattle. It is possible that a strict commitment to replacing all existing functionalities could limit the design development for a generally functional Seattle waterfront corridor given real cost and right-of-way constraints. For example, is streetcar replacement justified in all alternatives given low ridership and sizable right-of-way requirements (12" to 13" buffers on each side of the streetcar)?

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These considerations are included in the evaluation of alternatives that meet the project's purpose. The evaluation is contained in the Draft, Supplemental Drafts, and this Final EIS.

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Net increases in overall capacity are small under any of the alternatives, and some alternatives evaluated in the Draft EIS reduced overall capacity (Surface Alternative). The Alaskan Way surface street is expanded under several alternatives, but this is in response to reductions in lanes or ramps on the mainline. For example, mainline SR 99 has fewer lanes under the Bored Tunnel Alternative than it does today. This reduction is offset by an increase in lanes on surface Alaskan Way to accommodate downtown trips and a rearrangement of ramp locations to better distribute traffic on the mainline.

A comparison of lane-miles was not conducted since combinations of surface arterials and limited access lanes comprise each alternative, and the carrying capacities of these facilities can vary widely.
Please see the Final EIS Appendix C, Transportation Discipline Report, for updated analysis of the three build alternatives: the Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure.

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Opportunities to improve or develop alternate corridors are limited by the lack of parallel routes, the densely developed setting, and competing needs/uses on alternate routes. Opportunities on alternate corridors were considered prior to initial screening and again during transportation planning for the construction period.

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No Action Analysis

The no action alternative, evaluated for comparative purposes, involves the continued operation of the existing structure in 2030. This results in a comparatively conservative assessment of the operational/performance benefits of the build alternatives. Yet, our read of the DEIS suggests that the two versions of a No Build Alternative where the current facility is no longer operational are possible scenarios, especially considering the speculative nature of project funding. The EIS should indicate how the potential environmental impacts resulting from a non-operational Alaskan Way Viaduct are to be fully understood and addressed.

Page 12 of Appendix C states that the 2030 Baseline assumptions include funded projects, and that unfunded facilities are not included. Yet, it appears that the 2030 Baseline modeling scenario (No Build) includes some projects that are not currently funded (listed on page 13 of Appendix C), including the Sound Transit Link Light Rail segment that terminates at Northgate and the Washington State Ferry system expansion of Coleman Dock (appears to go from 3 to 4 auto ferry slips). These projects should be removed from the No Build Alternative, or clarification should be provided regarding the differences between the 2030 Baseline and the alternatives.

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Finally, it would be helpful if the EIS contained a line drawing (Appendix W), in addition to the shown cross-section, of the existing structures that would be operational in a future no-build scenario. This would allow a direct comparison of facility configuration and roadway-engineering improvements that will be part of the rebuild option.

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Cost breakdown for Sub-elements of the Project

Costs should be broken out by categories or groups of investments to facilitate an understanding of the various corridor elements. Appropriately, the Alaskan Way Viaduct corridor has been construed more broadly than simply the elevated facility at risk of failure resulting from a major seismic event. At a minimum, all alternatives, and the resulting "project", appear to include the Seattle Seawall replacement, surface street improvements, temporary structures erected during construction, Viaduct replacement structures (varying by alternative), and the Coleman Dock expansion.

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Economic Analysis

Since the successful preservation of this transportation corridor is important to the region's economic future, a fully developed economic analysis of the alternatives is warranted. Economic analysis is not directly required under the State Environmental Policy Act or the National Environmental Policy Act. However, it is certainly best practice to perform formal analysis, such as benefit cost analysis, prior to a decision on a preferred alternative. This analysis might be undertaken outside of the environmental review process, but shares the common aim of providing information that is relevant to the decision process. Destination 2030, the region's long-range transportation plan,

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The Final EIS analyses the Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure Alternatives. In addition, the Viaduct Closed (No Build Alternative) is carried forward as required by environmental regulations to provide baseline information about conditions in the project areas if nothing were done. These alternatives are fully described in Chapter 3 of the Final EIS.

The project baseline assumptions for 2030 have been updated for the Final EIS. The Transportation Discipline Report, Appendix C, Chapter 2 Methodology and Chapter 5 Operational Effects, Mitigation, and Benefits, respectively, explain how the 2030 No Build Alternative was modeled and how transportation and land use could be affected.

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A drawing comparing the width of the current design for the Elevated Structure with the existing viaduct structure is included in the Final EIS.

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Although costs are an important part of project planning and decision-making, they are purposely not part of the environmental review process. Overall project costs are included with the overall project description and are used by the economic impact analysis. Cost estimates by project element were used by the lead agencies in developing the preferred alternative. It should be noted the Colman Dock project is a separate project and its costs are not included with this project's costs.

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A cost-benefit analysis is not warranted for the project because economics are not a direct component of the project's purpose and need. The purpose and need reflects the project lead agencies' desire for a

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contains the following language relating to economic analysis on project status in the plan.

> *Destination 2030 utilized least cost planning analysis as input to regional decision processes. In addition, all major "Candidate" projects must conduct and document an enhanced benefit-cost analysis (appropriate to the scale and complexity of the study) that considers reasonable full public and private costs of transportation in its environmental analysis leading to a decision on a preferred alternative or option.*
>
> --Appendix 6

A formal economic assessment, recognizing opportunity costs and quantifying user benefits, is the preferred way to estimate the economic viability of this type of project. The assessment of economic impacts associated with the project construction is handled responsibly within a traditional input-output framework. However, this tells us very little about the economic viability of the project itself or the relative economic importance of project alternatives. For example the same construction multipliers effects would result from an alternative project, with equivalent federal participation, regardless of the nature of the construction project. A project that is economically important will in fact change production functions in some small way.

The input-output analysis recognizes that only new dollars represent net contributions to the regional economy. For consistency, the same perspective should be applied to the measure of sales tax impacts.

In addition to the project capital and operating costs, the substantial economic impacts of construction will relate to the business disruption during the prolonged construction period associated with any build alternative. It was not clear that these economic impacts were formally quantified in the DEIS. As they are quantified, they should be included in formal economic analysis in a manner that can aid the decision-making process.

Construction Impacts and Duration

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The reader should be able to determine the added or avoided costs (business impacts, cost of temporary structures, travel delay costs, pedestrian impediments, construction staging efficiencies/inefficiencies, environmental impacts of temporary aerial structures, etc.) of keeping through lanes open in the corridor through the construction period. As referenced above, the construction timeline for any build alternative is substantial, as much as 11 years. It is our understanding that, in part, the assumptions governing analysis of the construction period include partial operation of the existing or temporary replacement structures, as described in the purpose and need statement. Alternative construction approaches probably need to be evaluated, including those that do not provide partial, but continuous, through vehicle capacity in the corridor. Essentially, the question of what construction management approaches to be employed requires a more detailed assessment of various strategies, their timelines, costs, and localized economic

safer transportation facility that will maintain or improve mobility, accessibility, and traffic safety. The cost of not maintaining the current benefit of a north-south traffic corridor would be the costs associated with increased congestion as the existing 110,000 vehicles per day use alternative routes. Economic viability is not the appropriate benchmark for public infrastructure projects, especially this project that has such a strong public safety component.

Sales taxes would not be new dollars, as the funds to pay sales taxes would originate either within the Puget Sound Region or within the state (from the funds collected to construct the project). In essence, the project trades gasoline taxes for sales taxes; the result is a transfer of gasoline tax income (collected within Washington State) into individual city and county coffers (collected within Washington State). These are still funds that originate and are spent within the state. In the absence of this project, the gasoline taxes would still be spent on other highway and roadway projects within Washington State, thereby generating their own sales taxes.

An economic analysis for individual businesses is not feasible. Impacts were evaluated by separate business districts, as appropriate, that share common economic characteristics such as location, reliance on on-street short-term parking for customers, business size, and access. Assessments of the total value of individual businesses are typically not found within publicly-available information. Evaluations of an individual business' ability to continue operating during the prolonged construction period would be speculative, would rely on information that may not be able to be independently verified, and would be subject to economic forces beyond the direct control of the project. For these reasons the economic analysis limited itself to identified business districts as the smallest division for analysis.

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and environmental impacts. We could not find a complete assessment of quantifiable construction related impacts for the construction scenarios outlined in the EIS summary document and technical appendices.

In addition, as a preferred alternative is developed, we expect that a detailed construction management and mitigation plan that covers the above categories of impact will be put in place that reflects significant public involvement.

Transportation Operational Analysis

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The analysis in the transportation technical appendix is not clear enough to allow a reasonable assessment of the appropriateness of the analysis, verify the uniform treatment of alternatives, or draw unambiguous conclusions about operational deficiencies or benefits across alternatives. Examples include the following:

- Does the sum total of all the various modeling approaches result in an assumption of near total inelastic demand, not just for trip generation, but for all meaningful aspects of trip behavior such as origin and destination parings? Is the reader to conclude that alternatives with similar surface configurations will result in dramatically different surface network operating conditions? If so, does this reflect best professional judgment relating to human behavior, or the application of state-of-the-art modeling techniques? If professional judgment and modeling results diverge, how is the reader to reconcile the two? These are particularly important questions when build alternatives represent widely varied approaches to corridor investment.

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- Even the technically literate reader is unable to disentangle the elements of the methods employed sufficient to reconstruct the analytical design. It is unclear how the combined use of the regional travel demand model with CORSIM and Syncro has contributed to an appropriate description of operational issues associated with different alternatives. So, for example, it is difficult to eliminate the possibility of the unintended introduction of analytical bias. This ambiguity is compensated for with statements like the following:

  This methodology results in conservative establishment of detailed traffic estimates for analysis and decreases the likelihood (and potential magnitude) that operating conditions for 2030 were overstated. (Page 15)

  But one is still left wondering what this means. How are the words "conservative" and "overstated" to be interpreted?

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- The transportation report contains numerous measures of effectiveness (beginning on page 19), but there is considerable overlap across the various measures: traffic density, speeds, hours of delay, traffic distribution, and volume to capacity ratios.

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The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

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The analysis employed makes use of standard and accepted tools and practices available to transportation planners. Travel forecasting was conducted using a version of the regional travel demand model developed by the Puget Sound Regional Council. This tool is used to estimate forecasted conditions for all major projects in the four-county Puget Sound region. While some elements of the model are fixed (population and employment forecasts, for example), the model is not inelastic in nature. Travel choices are based on relationships between travel opportunities and costs. Hence, fewer trips are forecast in the study for reduced-capacity alternatives than for higher-capacity alternatives (see screenline tables). The traffic projections are based on travel demand modeling using the PSRC's regional model and are confirmed by professional judgement. Please see the Final EIS

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How will the peak hour operational findings get incorporated into a more comprehensive assessment of alternative viability, or effectiveness analysis? Two important questions remain: How will the costs and benefits of the alternatives be expressed in manner that allows comparison (not merely peak-hour measures of effectiveness) and avoids the pitfalls of multiple and non-exclusive measures? And how will the measures be utilized as part of the development of a preferred alternative? The DEIS appears to be silent on these important issues.

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- It is unclear how traffic impacts from the expanded ferry terminal facilities (diagrams in Appendices W and X appear to display a terminal with four auto slip and two passenger ferry slips) are treated in the operational analysis of the build alternatives. Do these methods differ from a no-build alternative that includes ferry terminal expansion as referenced on page 13 of Appendix C? What are the auto and passenger ferry facility and service assumptions for each alternative?

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- Detailed analysis of pedestrian movements and additional potential pedestrian demands is lacking though general impacts to existing conditions are discussed by alternative in Appendix C.

Development of a Preferred Alternative

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It is not entirely clear from the DEIS how the preferred alternative will be developed. The analysis of "measures of effectiveness" relates entirely to the transportation objectives and the transportation technical reporting. Are these to be used in a formal way in the development of a preferred alternative, and if yes, in what manner? Will the leadership team have a formal role in developing the preferred alternative? Some general description of the process from this point forward would be helpful for the interested reader.

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Part Two: Steps to be taken to advance the Alaskan Way Viaduct and Seawall Replacement project from a Candidate project to an Approved project in Destination 2030.

- Background. In May 2001, the Puget Sound Regional Council adopted a new regional transportation plan – Destination 2030. This plan included guidance for capacity investments that categorized all regionally significant improvements as either Candidate or Approved (please refer to Guidance for Major Capacity Investments for a more detailed explanation of these distinctions). The Alaskan Way Viaduct and Seawall Replacement project is included in Destination 2030 as a candidate project. Candidate projects must satisfactorily address Approved project criteria before being designated as Approved in Destination 2030.

- Process. Destination 2030 includes a policy that enables the Regional Council's Executive Board to authorize a change in status of regionally significant projects from Candidate to Approved. Listed below is a summary of the requirements

Appendix C, Transportation Discipline Report, for updated transportation analysis.

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A more detailed description of the methodology used for the preparation of traffic forecasts and traffic operations analysis can be found in Chapter 2, Methodology, of the Final EIS Appendix C, Transportation Discipline Report.

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The range of measures of effectiveness are intended to provide a broad and comprehensive picture of transportation conditions for each of the alternatives studied. These measures covered both daily and peak period conditions, as appropriate. While they inform the selection of a preferred alternative, no formal scoring or weighting system was employed to combine the results of these measures. The decision of the preferred alternative (Bored Tunnel Alternative) was based on numerous criteria, many beyond the transportation measures identified in the Draft EIS. Note that a cost-benefit analysis is not typically part of a NEPA/SEPA environment process.

Subsequent analysis for the Final EIS considered a smaller, more focused set of transportation measures.

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The Washington State Ferries' proposal to expand Colman Dock to include four slips for vehicle ferries and two slips for passenger ferries has changed since it was discussed in the 2004 Draft EIS. Subsequent traffic analysis for the Final EIS reflects forecast conditions (under year-2030 demand) given current services, which has two slips for vehicle ferries at Colman Dock. The Transportation Discipline Report,

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identified in the Guidance for Major Capacity Investments for moving a project from Candidate to Approved status.

1. Regional Council staff review and determine consistency of the project's final preferred alternative with Destination 2030 policies.
2. Sponsor provides documentation for completed benefit cost analysis.
3. Environmental documentation is completed and submitted with sufficient detail as to the final nature, character, components or design of the given project or program to determine regional policy consistency.
4. Sponsor satisfactorily addresses any other planning requirements, which might have been specified by the Regional Council's Executive Board for a given project.
5. Sponsor submits financial plan demonstrating project feasibility by showing how the entire corridor project or its individual project components are to be funded.
6. The project's final preferred alternative is reviewed for consistency with the current plan air quality conformity analysis; a new air quality plan conformity determination may be required.

When a Candidate project meets the above requirements, the project sponsor(s) may request the Regional Council to change the project and associated supporting projects to Approved status.

In conclusion, the Regional Council would like to again thank the study team for their commitment to this project. If you have questions about our comments, please call me at (206) 464-7134 or Kevin Murphy, Program Manager at (206) 464-6411.

Sincerely,

Norman A. Abbott
SEPA Responsible Official

Appendix C, Chapter 5 Operational Effects, Mitigation, and Benefits, explains how transportation, including ferry service, could be affected.

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Since publication of the Draft EIS, further efforts have been undertaken to improve the pedestrian assessment for the Final EIS. Additional detail on pedestrian effects is provided in Chapter 5 of the Final EIS Appendix C, Transportation Discipline Report. Chapter 6 of the Final EIS details effects during construction.

One example of these additional efforts is the updated pedestrian volumes that were collected by video along the Alaskan Way surface street in downtown Seattle in August 2006. The purpose of these counts was to quantify pedestrian activity in the summer season along the waterfront for use by the project team in assessing transportation conditions, developing mitigation programs, completing the Final EIS, and furthering project design. Data collected for this effort confirms that pedestrian activity on the waterfront promenade is substantially higher in the summer, particularly during summer weekends.

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Please see Chapter 2 in the Final EIS for a description of how project alternatives were identified and developed.

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Thank you for describing this process. The lead agencies have been coordinating with PSRC as appropriate.