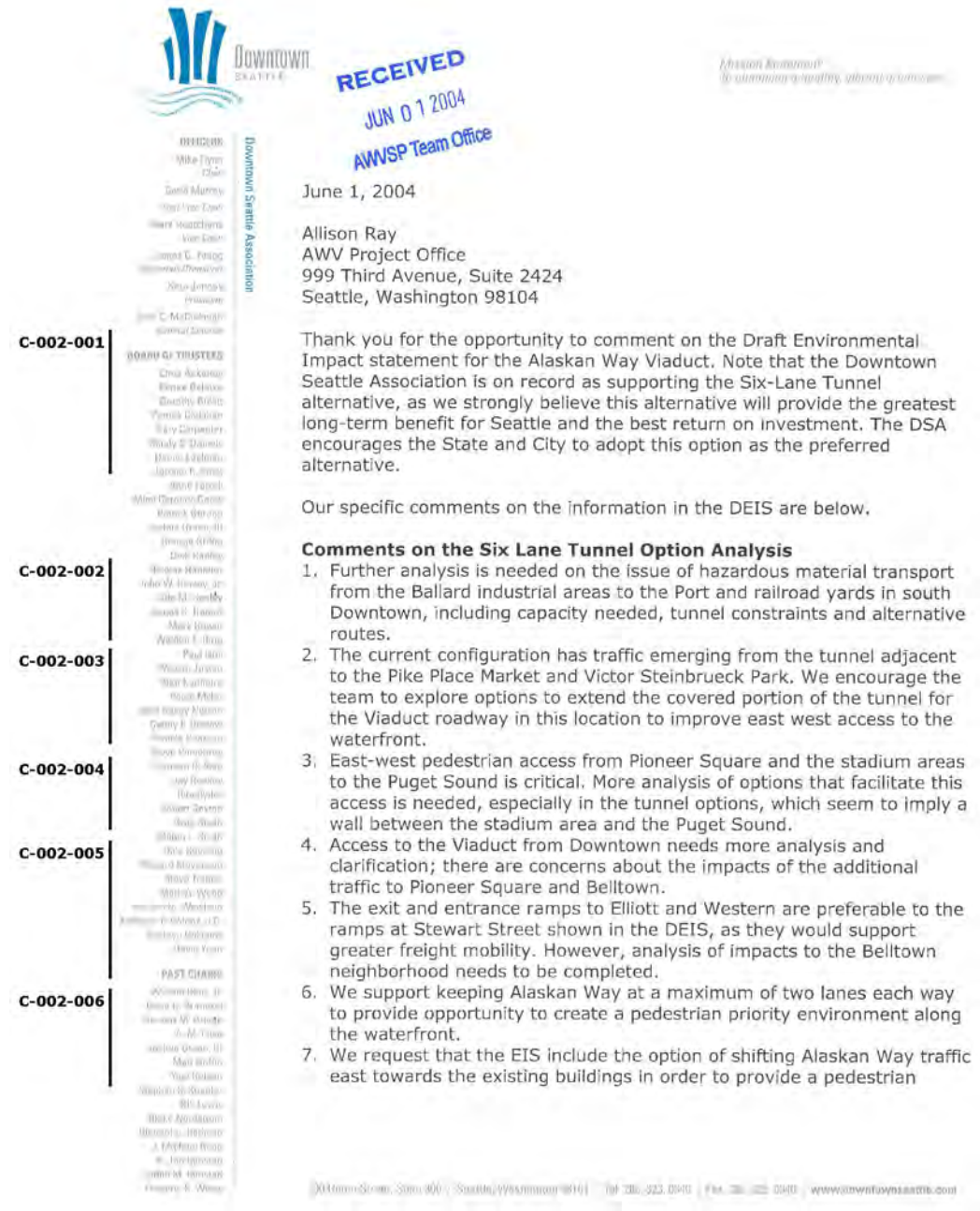

Downtown Seattle Association

RECEIVED
JUN 01 2004
AWSP Team Office

June 1, 2004

Allison Ray
AWV Project Office
999 Third Avenue, Suite 2424
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C-002-001

Thank you for the opportunity to comment on the Draft Environmental Impact statement for the Alaskan Way Viaduct. Note that the Downtown Seattle Association is on record as supporting the Six-Lane Tunnel alternative, as we strongly believe this alternative will provide the greatest long-term benefit for Seattle and the best return on investment. The DSA encourages the State and City to adopt this option as the preferred alternative.

Our specific comments on the information in the DEIS are below.

Comments on the Six Lane Tunnel Option Analysis

C-002-002

1. Further analysis is needed on the issue of hazardous material transport from the Ballard industrial areas to the Port and railroad yards in south Downtown, including capacity needed, tunnel constraints and alternative routes.

C-002-003

2. The current configuration has traffic emerging from the tunnel adjacent to the Pike Place Market and Victor Steinbrueck Park. We encourage the team to explore options to extend the covered portion of the tunnel for the Viaduct roadway in this location to improve east west access to the waterfront.

C-002-004

3. East-west pedestrian access from Pioneer Square and the stadium areas to the Puget Sound is critical. More analysis of options that facilitate this access is needed, especially in the tunnel options, which seem to imply a wall between the stadium area and the Puget Sound.

C-002-005

4. Access to the Viaduct from Downtown needs more analysis and clarification; there are concerns about the impacts of the additional traffic to Pioneer Square and Belltown.
5. The exit and entrance ramps to Elliott and Western are preferable to the ramps at Stewart Street shown in the DEIS, as they would support greater freight mobility. However, analysis of impacts to the Belltown neighborhood needs to be completed.

C-002-006

6. We support keeping Alaskan Way at a maximum of two lanes each way to provide opportunity to create a pedestrian priority environment along the waterfront.
7. We request that the EIS include the option of shifting Alaskan Way traffic east towards the existing buildings in order to provide a pedestrian

C-002-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the 2004 Cut-and-Cover Tunnel Alternative. The alignment for the Cut-and-Cover Tunnel Alternative has been refined in the Final EIS. The lead agencies have identified the Bored Tunnel Alternative as the preferred alternative due to its ability to best meet the project's identified purposes and needs and the support it has received from diverse interests. Because the project has evolved since comments were submitted in 2004, please refer to the Final EIS for current information.

C-002-002

Currently, transporting hazardous materials is prohibited at all times in the Battery Street Tunnel, and during peak periods on the viaduct. This would continue to be the case under the Elevated Structure Alternative. Transporting flammable or hazardous materials would be prohibited in the tunnel for the preferred Bored Tunnel Alternative and the Cut-and-Cover Tunnel Alternative. Operators hauling these types of materials would need to use I-5 or Alaskan Way.

C-002-003

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel Alternative and evaluated in the 2006 Supplemental Draft EIS. It was included in the project due in part to numerous 2004 Draft EIS public comments requesting the lead agencies to consider a lid in the Pike Place/Belltown area. The proposed lid would extend north from where SR 99 emerges from the tunnel's north portal near Pine Street to Victor Steinbrueck Park near Virginia Street. The design for this lid structure with the current Cut-and-Cover Alternative is described in this Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.

C-002-006 boulevard along the water and potential development sites for small mixed-use buildings.

C-002-007 8. We support the interchange connecting SR 519 and SR 99 at Atlantic Street and Royal Brougham Way.

Construction Impacts

C-002-008 1. We believe it is important to provide an opportunity for the community to compare the impacts of a shorter construction schedule with limited access and a longer schedule with two lanes of access (the option shown in the DEIS). Therefore, we request that the EIS contain an option that analyzes ways to shorten the construction schedule.

C-002-009 2. The transportation improvements and strategies being developed to cope with a sudden and catastrophic loss of the Viaduct should be factored into the access and capacity assumptions for the alternatives. Could some of the improvements that would be made to I 5 and other transportation networks to cope with a sudden loss of the Viaduct be integrated into the Viaduct project, and would they reduce the number of lanes needed on Highway 99 in the central waterfront?

Flexible Transportation Package

C-002-010 1. The DEIS mentions a range of transit mitigation options in the Flexible Transportation Package. We are concerned that 7 to 11 years of reduced access will make Downtown a less desirable place to live and work. This will not only threaten Downtown's economic development, but could impact our ability to reach regional growth management targets. We feel that this project is an opportunity to permanently improve the non-SOV options for access to Downtown. We would like to see the plan directly address mode shift targets needed in order to both mitigate construction impacts and increase the proportion of non-SOV trips to Downtown.

2. We support the commitment to provide funding for increased transit options and for personalized business assistance. We encourage the mitigation package to emphasize direct services to businesses; small businesses need one-on one assistance to learn about and adopt new transit solutions.

3. We strongly support the management and monitoring provisions built into the Package; it is very important to measure the usage of and satisfaction with the options.

Business Impacts

C-002-011 1. The DEIS mentions low interest loan packages, but experience in Seattle after the earthquake and in other places suggests that loans only work

2

C-002-004

Please see the updated pedestrian facility descriptions in the Final EIS. East-west pedestrian access across SR 99 would be provided at S. Atlantic Street and S. Dearborn Street. From S. King Street northward, east-west connections would be similar to today's. In addition, pedestrian facilities adjacent to both sides of SR 99 in the Stadium area would be improved compared to existing conditions. With the Bored Tunnel Alternative, SR 99 would be underground by S. Dearborn Street, improving the pedestrian environment at S. Dearborn Street and northward.

C-002-005

Updated Stadium ramp configurations are described in the Final EIS. Analysis of traffic patterns for vehicles accessing ramps to and from SR 99 in the stadium area show that vehicles will disperse on to a variety of streets in the area such as S. Royal Brougham Way, Alaskan Way, First Avenue, Fourth Avenue, etc. Included within the discipline report are a variety of metrics looked at roadway and intersection performance. These analyses were performed with analytical tools using data for a range of modes including pedestrians, trucks, transit, ferries and automobiles.

The Ellliott/Western ramps are included in the Cut-and-Cover Tunnel and Elevated Structure Alternatives but are removed in the Bored Tunnel (Prefered Alternative). Please refer to Appendix C, Transportation Discipline Report, of the Final EIS for traffic analysis in both the Belltown and Pioneer Square neighborhood areas.

C-002-006

The City of Seattle is leading the project for the Alaskan Way Surface Street Improvements and its associated environmental review process, which would take place under NEPA and/or SEPA as appropriate. This project involves rebuilding and improving Alaskan Way between S. King

C-002-011

when the business has the potential for increased sales that would make it possible to pay back the loan. The extended construction period of this project suggests that this may not be the case for businesses impacted by the AWV project. (It would be useful to research Boston's experience in this area.) The mitigation plan should consider other options such as temporary relocation, funds for individual business and neighborhood marketing, and consulting help to develop new business strategies, such as Internet sales.

2. The mitigation plan briefly mentions marketing and communications, (we assume the Downtown Services Association mentioned in section 3.1.8 was intended to be the Downtown Seattle Association) but we suggest a much stronger emphasis on this component. An integrated, comprehensive, aggressive PR and marketing campaign will be needed to keep the public informed and willing to come Downtown.

Thank you for the opportunity to respond, and we look forward to working with you on this project.

Sincerely,

Kate Joncas

Kate Joncas
President

Street and Pine Street. The new surface street would be six lanes wide between S. King and Columbia Streets (not including turn lanes) and four lanes between Marion and Pike Streets. Generally, the new street would be located east of the existing Alaskan Way surface street where the viaduct is today to create a wider public space along the waterfront.

C-002-007

The stadium area interchange connecting S. Atlantic Street and S. Royal Brougham Way to SR 99 is now under construction, but it is now known as the S. Holgate Street to S. King Street Viaduct Replacement Project.

C-002-008

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.

C-002-009

The number of lanes proposed along the Alaskan Way Viaduct with the

build alternatives were select based on the projected demand as well as the capacity of connecting segments and roadways. This is to ensure that the new segment doesn't introduce a new bottleneck into the corridor, or conversely, doesn't provide excess capacity that couldn't be used effectively. Improvements to I-5 and other corridors have been studied as part of construction transportation planning and through other efforts, but cost-effective solutions on these corridors that could accommodate projected growth and some share of the SR 99 traffic over the long term have not been identified.

C-002-010

Thank you for your comment regarding the Flexible Transportation Package (FTP). Since the Draft EIS was published in 2004, the FTP has been further developed as part of the project's construction transportation planning process (though the name FTP is no longer being used). The Final EIS details a proposed set of actions aimed at managing mobility and reducing travel impacts associated with construction of the Alaskan Way Viaduct Replacement Project. These actions are intended to help transit operate efficiently given increased general-purpose traffic in the downtown Seattle area during construction. These actions should improve transit access through downtown Seattle and minimize the effect of peak period traffic congestion for transit passengers and operators.

C-002-011

Along with the project, the mitigation measures being considered have evolved since 2004 and no longer consider low-interest loan packages. Chapter 8 of the Final EIS and Appendix L, Economics Discipline Report, describes mitigation measures for the project in detail. The mitigation measures for the build alternatives have common themes:

- Focusing on clearly defining and directing pedestrian and vehicle traffic in a systematic and streamlined manner
- Providing adequate parking for construction workers and

encouraging short-term parking along the waterfront

- Distributing timely and informative project and construction updates
- Providing noise mitigation
- Preparing and assisting businesses within the project area to maintain an accessible and profitable business