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AWV Project Office
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May 31, 2004

Dear Ms Ray:

Allied Arts commends WSDOT, the City of Seattle and the Federal Highway Administration for their initial work to analyze the environmental impacts regarding changes to the downtown Seattle waterfront, as well as to guide the process our region is taking toward redevelopment of this neighborhood. We also consider the Draft EIS and associated comments to be just one step in a series of necessary input opportunities and collective decisions.

C-018-001

Our position regarding the Alaskan Way corridor is that all through-Seattle traffic should travel underground from Atlantic Street into the Battery Street Tunnel and that Alaskan Way should receive no net gain in roadway. (Though technically Alaskan Way includes the area below

C-018-001

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Tunnel Alternative with no net roadway gain on Alaskan Way.

C-018-001

the viaduct, our definition refers to the three to four lane arterial.)

Since none of the five alternatives accomplish these goals, it is with some reluctance that we support the cut and cover tunnel alternative. Only this "tunnel option" comes close to creating a waterfront as a destination and not just a transportation corridor.

C-018-002

Having monitored the public discussion regarding the future of the waterfront for close to three years, we find that the DEIS would be significantly more meaningful if it approached its relevant issues using different questions, specifically:

- Instead of asking what "What type of transportation infrastructure should replace the viaduct?" the DEIS should answer, "What uses should we have for the land on the waterfront?"
- Instead of "How many cars and trucks need to move through the Alaskan Way corridor?" the DEIS should answer, "How many people and how much freight do we need to move through the full downtown corridor?"
- In addition to asking, "How can we reconstruct the seawall to make the land safe?" the DEIS should answer, "How can the seawall improve marine habitat?"

We ask that as you further study the opportunities for the waterfront that you also analyze and address the following considerations:

C-018-003

Pike Place Market to Waterfront Lid

The tunnel option includes a new viaduct from Pine to Battery. Extensive analysis should be made to develop a pedestrian descent over SR 99 from Virginia, south, to Alaskan Way.

C-018-002

Thank you for providing some suggested questions. The first suggested question related to land use extends beyond the purpose and need of this project, which is "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." Potential effects to land from the Alaskan Way Viaduct Replacement Project are discussed in the 2004 Draft EIS, 2006 Supplemental Draft EIS, 2010 Supplemental Draft EIS, and the Final EIS. The question "What uses should we have for land on the waterfront?" is being considered as part of the City's Waterfront Planning Project, which is a broader land use and planning effort.

The 2004 Draft EIS, 2006 Supplemental Draft EIS, 2010 Supplemental Draft EIS, and the Final EIS do discuss the volume of vehicles currently using the corridor and the projected volume of vehicles expected in 2030. Additional details are provided in the Transportation Discipline Report, which is Appendix C to each of these documents. These documents discuss how freight, transit, typical drivers, and pedestrians use the SR 99 corridor and describe how each alternative would change for these drivers and different users.

Your third suggestion relates to habitat. The lead agencies are committed to avoiding and minimizing adverse effects to habitat within the project area, and they are interested in enhancing or improving existing habitat, where it is feasible. The Bored Tunnel Alternative does not include replacing the seawall, improving the Alaskan Way surface street, or building a streetcar. However, improvements to these facilities would be individual projects led by the City of Seattle that are part of the Alaskan Way Viaduct and Seawall Replacement Program.

C-018-003

A lid was incorporated into the design of the 2006 Cut-and-Cover Tunnel

C-018-003

Belltown to Waterfront Connection

A new viaduct from Virginia to Battery (as in the tunnel option) poses a significant barrier between the well-populated Belltown neighborhood and the waterfront. In addition to other clever solutions, lidding and under-viaduct structures should be considered as means to develop pedestrian comfort and wayfinding.

C-018-004

Pioneer Square Land Bridge

The tunnel portal near Pioneer Square would also be a significant barrier to healthy neighborhood connections. A land bridge arching over the portal that diminishes the horizontal gap should be considered.

Center City Land Bridge

Consideration should be given to a one- to three-block long land bridge over Alaskan Way somewhere between Yesler and Pike that would enable pedestrians to get to the water's edge from Western Avenue without crossing traffic. The space along Alaskan Way between Spring and Pike streets is a prime opportunity.

C-018-005

Southern Tunnel Portal

Analysis should be given toward moving the southern portal to the tunnel to a point south of Atlantic Street.

C-018-006

Tunnel Capacity

Based on a re-knitted downtown street grid, analysis should be given to diminishing the number of lanes in the cut and cover tunnel option from six down to four.

C-018-007

Access Road

We challenge the need for the access road as presented in the cross-section diagram for the tunnel option. Analysis should be given to providing delivery access from the curb of Alaskan Way, in keeping with the style along the other downtown avenues.

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 the Final EIS and in Appendix B, Alternatives Description and Construction Methods Discipline Report.

C-018-004

In the preferred Bored Tunnel Alternative evaluated in the Final EIS, the portal was moved south of S. King Street.

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-018-005

Your comment is appreciated and has been discussed by the design team. The configuration of the tunnel requires that on- and off-ramps access the tunnel from the tunnel portals. Moving the tunnel portal south would force the on- and off-ramps into the existing BNSF SIG and Whatcom railyards. This is not feasible given the current rail operations and traffic constraints.

C-018-008

Tourist and School Bus Holding Area

A parking station for busses away from the waterfront should be considered, such that they need only load and unload and not park on Alaskan Way.

C-018-009

No net Increase in Speed on Alaskan Way

The speed limit on Alaskan Way should be no more than 30 mph. Traffic lights should be set to move traffic between 22 and 28 mph—again, in accordance with other downtown avenues.

C-018-010

Distribute Additional Traffic Among All Downtown Avenues

As changes are made to SR 99, any additional traffic directed to the surface should be spread equally among all of the downtown avenues. I-5 should also be considered as an alternative for increased capacity, especially if it is reconfigured.

C-018-011

Pier Acquisition

The center city piers (48 – 70) are in dire need of repair or removal and the businesses located on the piers are more than likely to suffer from the deconstruction and construction process. Economic, environmental and cultural considerations should be analyzed regarding acquiring the piers and mitigating re-location of the businesses located on them. Plans for the new seawall and traffic infrastructure should fully consider the possibilities of a reconfiguration of the piers and businesses located on the waterfront.

C-018-012

Economic Analysis

The DEIS lacks an analysis of the economic ramifications to the waterfront neighborhood that compares the five DEIS alternatives. A full study should be made using both an analysis of the Seattle waterfront, current and future, as well as a review of other cities' waterfronts, post highway removal.

C-018-006

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-018-007

The layouts for the Alaskan Way surface street have been updated for the Final EIS and no longer include a service lane/access road. Please refer to the Final EIS for updated information. The ultimate design of Alaskan Way will be determined as part of the City of Seattle's Central Waterfront Project.

C-018-008

The need for tour and school bus waiting areas has been identified. This need would be greatest with the Cut-and-Cover Tunnel Alternative and Elevated Structure Alternative. The preferred Bored Tunnel Alternative is not likely to affect bus holding areas along the waterfront except during viaduct demolition. Alternate locations will be identified as construction plans are refined. These locations may be influenced by the Central Waterfront Project led by the City of Seattle.

C-018-009

The speed limit along the Alaskan Way surface street is currently 30 mph, the standard speed limit for arterial streets in the City of Seattle. The Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure Alternatives, the three build alternatives carried forward to the Final EIS, do not propose to change the speed limit along the Alaskan Way surface street. Traffic signals on Alaskan Way for the Cut-and-Cover Tunnel and Elevated Structure Alternatives would be designed to help facilitate safe

C-018-013	<p>Housing Analysis Analysis should be made of future opportunities for housing in adjacent neighborhoods and along the waterfront regarding the impact of traffic infrastructure.</p>
C-018-014	<p>Pedestrian Analysis Analysis should be made of the ease of pedestrian mobility on the street-level, both east-west and north-south. Location of pedestrian promenade should be analyzed.</p> <p>Skybridges Skybridges are the equivalent of pedestrian viaducts and should be avoided entirely.</p>
C-018-015	<p>Marine Habitat Analysis Analysis should be made of increasing salmon and marine-life habitat by at least 30% along construction areas.</p>
C-018-016	<p>Relocate Trolley Analysis should be made of moving Streetcar 99 to Western from Alaskan Way. A Western Avenue streetcar would better link neighborhoods to the waterfront and provide more space for destinations on the waterfront.</p>
C-018-017	<p>One Great Downtown Park Analysis should be made of identifying a space for a large, center city park, located south of Pike.</p>
C-018-018	<p>Construction Timeline and Costs Consideration and analysis should be made of the option of closing SR 99 for the duration of construction and absorbing traffic flow through a re-knitted downtown street grid.</p>
C-018-019	<p>Access to the Olympic Sculpture Park Pedestrian access to the new Olympic Sculpture Park should be prioritized over vehicular detours and flyovers. The Broad Street underpass beneath the railroad tracks should be excluded from the FEIS.</p>

and efficient traffic flow along the corridor. The Bored Tunnel Alternative does not include the Alaskan Way surface street as part of the project.

C-018-010

It is expected that, overall, traffic that diverts to use surface streets and I-5 will distribute based on available capacity and driver consideration of travel time of these various roadways. At this time, there are no plans to substantially increase capacity along I-5 through the downtown core. More information about these and other traffic management strategies can be found in Appendix C, Transportation Discipline Report, of the Final EIS.

With the preferred Bored Tunnel Alternative, the southbound on-ramp at Columbia Street and the northbound off-ramp at Seneca Street will be removed. Traffic patterns are expected to alter slightly with removal of these ramps, and the Alaskan Way surface street is expected to carry additional traffic to and from the central business district. Therefore, to provide similar capacity levels as currently exists today, six lanes of traffic on the Alaskan Way surface street are necessary south of Yesler Way.

C-018-011

Reconstruction of the pier structures is beyond the scope (and Purpose and Need) of the Alaskan Way Viaduct Replacement Project. Additionally, the lead agencies do not own many of the piers. The economic impacts and mitigation strategies for waterfront businesses are described in the Final EIS and Appendix L, Economics Discipline Report.

C-018-012

A detailed Economic Technical Memorandum was prepared for this project (Appendix P of the Draft and 2006 Supplemental Draft EISs) and provided important information to the public and decision-makers. This

Conclusion

In conclusion, we recognize that the major landowners along the waterfront are each public entities, holding the land in the public trust. We call upon WSDOT, the City of Seattle, the Port of Seattle and the Department of Natural Resources to work cooperatively, as well as to value and consider the quality of life aspects of our new waterfront that are otherwise out of their stated missions.

The Seattle waterfront has a long tradition of making bold changes to meet the needs of Washingtonians. Just as we poured Denny Hill onto our shoreline and constructed a viaduct along the waterfront last century, we should not miss this once in a century opportunity to make the waterfront a legacy that will bring pride to Seattleites and Washingtonians of the future.

Sincerely,

David Yeaworth
President
Allied Arts of Seattle

document was updated as Appendix L, Economics Discipline Report, of the 2010 Supplemental Draft and Final EISs. The analysis addressed the reasonably foreseeable economic impacts and benefits of the alternatives. While this project is unique, the experience of other cities that have built similar projects has been considered by the lead agencies.

C-018-013

Future housing opportunities in adjacent neighborhoods and along the waterfront would be determined primarily by market conditions. If the demand for housing in these areas remains high, new development may include residential uses where zoning allows. The proposed project may influence this demand in two ways. First, during the initial phases of construction, demand for housing in the immediate project area may be low because of construction traffic and activities. Second, toward the end of construction and immediately thereafter, demand for residential uses in these areas may increase once new infrastructure has been provided.

It is not possible to determine if these influences would be certain because they are strongly dependent upon other factors, the most significant of which would be economic conditions. To some extent, the demand for downtown and/or waterfront property for all uses is expected to remain strong, because the amenity values associated with these areas tend to be highly valued. If the Seattle-area economy is strong, future demand may remain high, even during construction activities, particularly among longer-term investors. On the other hand, if local economic conditions decline, interest in high-cost properties such as those along the waterfront, may also subside. While new infrastructure may provide some attraction to the area, economic factors such as pricing, inflation, interest rates, and wages would be expected to strongly determine the supply and demand of housing in the downtown and waterfront areas. The Final EIS Appendix L, Economics Discipline

Report, and Appendix G, Land Use Discipline Report, discuss economic conditions and zoning in the project area.

C-018-014

The mobility and access of pedestrian activities and their interaction with motorized vehicles has been studied, and the results are reported in the Final EIS Appendix C, Transportation Discipline Report. The pedestrian promenade is also discussed in this document. Both east-west and north-south pedestrian movements would be maintained for the duration of construction activities. The design of the central waterfront pedestrian facilities will ultimately be developed as part of the Central Waterfront Project being led by the City of Seattle.

C-018-015

Direct impacts to fish and wildlife are avoided through the selection of the Bored Tunnel Alternative. With the Bored Tunnel Alternative, there is no in-water work for the Project. Because direct impacts are avoided, compensatory mitigation is not required.

C-018-016

Construction of the Olympic Sculpture Park and the resulting displacement of the vehicle storage and maintenance facility led to the indefinite suspension of the George Benson Line Waterfront Streetcar service in 2008. King County Metro currently provides replacement service with fare-free bus service on the Route 99 Waterfront Streetcar Line. The routing and stop locations for this line do not exactly duplicate those of the waterfront streetcar; however, Route 99 serves the same neighborhoods—the waterfront, Pioneer Square, and Chinatown/International District. The final location of the streetcar will be determined by the Central Waterfront Project being led by the City of Seattle.

The City of Seattle has evaluated the option of moving the Waterfront Streetcar from the Alaskan Way surface street to Western Avenue and found that businesses along the waterfront would be better served by maintaining operations in the Alaskan Way corridor.

C-018-017

The design of the Alaskan Way surface street is being carefully considered and coordinated with the City of Seattle. It is anticipated that the waterfront can become a prime public amenity for Seattle's downtown and the Puget Sound region. The specific configuration and types of activities featured on the waterfront will be decided over the next several years as the City continues its central waterfront planning efforts. There will continue to be many opportunities for the public to participate in that planning effort to help determine the future of their waterfront.

C-018-018

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-018-019

The preferred Bored Tunnel Alternative is not expected to affect access to the Olympic Sculpture Park.

With the Cut-and-Cover Tunnel or Elevated Structure Alternatives, pedestrian access to the Olympic Sculpture Park will be provided throughout project construction, although some detours may be required. During construction, vehicle detours for these two alternatives will be required near the park. The lead agencies will coordinate with the Seattle Art Museum if either of these alternatives is selected. The Broad Street underpass analyzed in the Draft EIS is no longer part of the project. Instead, the Cut-and-Cover Tunnel and Elevated Structure Alternatives propose to replace the ramps to Elliott and Western Avenues.