PEOPLE'S WATERFRONT COALITION

THE CITIZENS' ALTERNATIVE TO REBUILDING SEATTLE'S VIADUCT

Alaskan Way Viaduct and Seawall Replacement Project
Draft Environmental Impact Statement Response

RECEIVED
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AWVSP Team Office

Seattle, May 28, 2004

Dear Viaduct and Seawall Replacement Project Team,

Thanks for the opportunity to respond to your EIS. It is a well-written and thorough document, and your project managers have been consistently open and helpful in educating the public.

C-021-001

The Viaduct and Seawall Draft EIS is insufficient.
The scope of the transportation project is too narrowly defined. The Draft EIS only analyzes solutions that replace current capacity with a new highway in the same corridor, on Seattle's shore. This narrow scope precludes study of an alternative that is considerably cheaper, simpler, and less disruptive, and that offers Seattle the opportunity to reconnect to the shore. An alternative that makes improvements to the larger transportation system -- arterial connections, transit, the express lanes and entrances and exits on I-5, freight corridors, and the downtown grid – while keeping Alaskan Way as a typical 4 lane surface street should be analyzed concurrently in a supplemental EIS.

This alternative would define the optimal set of improvements to existing resources so they can accommodate Viaduct freight and vehicle traffic, away from the shore. It would also include fixes to the street grid north of the Battery Street tunnel to redistribute traffic, both north/south and east/west. The Seattle Department of Transportation's Central City Access Strategy and the People's Waterfront Coalition Proposal (www.peopleswaterfront.org) offer a great beginning framework that should then be developed into a comparable alternative.

C-021-002

The Draft EIS is premature because Seattle has not decided to replace the Viaduct.
A waterfront planning process is currently underway, guiding the citizens and the City of Seattle in defining the long-term future for Seattle's newly freed shore. Citizens are thrilled to recognize the scale of this opportunity for Seattle to reconnect to the water, and are demanding parks, beaches, water-based recreation, and pedestrian primacy. The citizens of Seattle have not concluded that a new highway is the most appropriate use of precious shore lands.

Recasting this profound opportunity as a transportation crisis and rushing to rebuild a highway before reviewing and analyzing the potential long-term benefits of alternative uses is short-sighted and wasteful. Possibilities for significant improvements in the City's quality of civic life, economy, and ecology are just now being compared and studied. The potential long-term benefits of alternative futures for the public waterfront land will be aborted by a highway megaproject. Other cities have taken advantage of similar conditions, and decided not to rebuild transportation infrastructure on their shores, to the long-term benefit of their communities and economies.

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C-021-001

An EIS evaluates alternatives for their ability to accomplish a project's purpose. This project's purpose includes protecting public safety and providing sufficient capacity to efficiently move people and goods to and through downtown Seattle. In addition to the alternatives presented in the 2004 Draft EIS, the 2006 Supplemental Draft EIS evaluated the revised Tunnel and Elevated Structure Alternatives and the 2010 Supplemental Draft EIS evaluated the Bored Tunnel Alternative. Improvements made to accomodate transit, freight, and traffic on the downtown street grid during construction have been studied as described in the Final EIS Appendix C, Transportation Discipline Report. Many of these improvements would remain in place once construction is completed. The alternative you suggest for the central waterfront and larger transportation system has been considered and does not address the need for improvements or the purpose of this project. The lead agencies developed this propose and need after listening to public comments following the Nisqually earthquake in 2001 and most recently revised it following the Partnership Process in 2007.

C-021-002

The City of Seattle is one of the three lead agencies for this project, as well as being responsible for planning regulation of uses along the Central Waterfront. As a lead agency, the City supports the project's purpose to provide a replacement transportation facility. The City has also integrated planning and design on this project with the Central Waterfront Project. In short, neither effort has been rushed or moved ahead without careful analysis. The build alternatives carried forward are those that meet the project's purpose.

The Seawall Replacement project should proceed without the Viaduct.

C-021-003 Unlike the Viaduct project, the Seawall project is urgent because of ongoing degradation and safety and reliability concerns. It should be separated out as a project and its completion pursued with appropriate urgency.

The EIS reveals multiple intolerable impacts to Seattle's economy and quality of life that add up to an unbearable cost.

All Options

C-021-004 • The extended construction period will inflict terrible economic loss to hundreds of local businesses, and dismal degradation to quality of life downtown. 7.5 to 11 years of 24-hour-a-day construction will be unbearably disruptive to the local economy, and decimate the 1200 businesses within a block of the project. "The strong will survive, and the marginal won't" is the brutal forecast for these businesses by planners.

C-021-005 • Construction mess, noise, and detours will make visiting the shore so inconvenient that citizens and tourists will likely avoid the area completely. An important part of our tourism economy will be starved out.

Aerial Option

C-021-006 • Erecting a temporary viaduct for the years it takes to actually construct a new permanent viaduct is a terrible idea. It extends the dark, scary, noisy experience of being under the current viaduct, destroys pedestrian comfort in the area, and will ward off all but the most committed visitors.
• It is an unbelievable waste of resources, time and money to build a temporary highway and then tear it down.

Tunnel Option

C-021-007 • The mouth of the highway tunnel next to Pike Place Market would denigrate the quality of life and long-term potential of this important cultural and economic resource. It is an awful location for a noisy, dirty tunnel entrance.

C-021-008 • The mouth of the highway tunnel next to Pioneer Square cuts off Seattle's first neighborhood from future connections to the shore. It prevents achievement of the long-term vision for more waterfront presence, as described in the neighborhood plan.

C-021-009 • The aerial structure between the tunnel mouth and Battery Street tunnel mouth acts as a barrier between Belltown and the waterfront.

C-021-010 • The tunnel options do not allow the connection to the shore and the open space opportunities many citizens are expecting. Because of the primacy given to vehicular movement, there is more pavement than exists now, and insufficient space on the surface for development of civic and recreation destinations.

Surface Option

C-021-011 • The surface alternative displaces up to 20 buildings and 581 jobs: too many.
• The surface option includes up to 10 lanes of pavement for vehicle flow, parking, and local access lanes. This consumes practically the whole width of the available space for transportation, creating a terrible environment for pedestrians, waterfront businesses, and anyone wanting to get close to the water.
• The surface option should include fixes to the larger transportation system, so that congestion does not adversely impact transit service.

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C-021-003

The Bored Tunnel Alternative, which is the preferred alternative, is independent of seawall replacement. The City of Seattle recognizes the vulnerability of the Elliott Bay Seawall and is pursuing its replacement as an independent project with the Army Corps of Engineers. If one of the other build alternatives is selected, the seawall would be replaced as part of the alternative.

C-021-004

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

C-021-005

It is acknowledged that direct traffic impacts could result in secondary economic impacts to the businesses along the corridor by decreasing the number of customers willing to patronize those businesses.

Impacts on tourist-dependent areas (Pioneer Square, Central Waterfront, Pikes Place Market, Seattle Center) vary between the build alternatives. Economic impacts to these tourist-dependent areas are a serious project consideration during construction. The Final EIS presents economic mitigation strategies developed from evaluating the use and success of these strategies on other projects of similar size and complexity.

Seawall

C-021-012

- The seawall project should include far more significant measures to create a functional shore ecology and viable marine habitat, and to assist juvenile salmon traversing this important migration corridor.

The Construction Approach

C-021-013

- Keeping the viaduct in operation during construction extends the construction period and expands the total cost. An alternative approach should be analyzed that fixes the larger transportation system before the viaduct is closed, to accommodate traffic in the larger system, and allow a shorter and less expensive construction process.

C-021-014

The citizens of Seattle are quickly beginning to understand that we probably do not really need a new highway, cannot afford the terrific risks and costs of this megaproject, and that we should not waste this opportunity to reconnect to our valuable shore. What is the best solution for Seattle? None of the above. These five alternatives might represent the best thinking for a narrowly defined state highway project, but not for the future of Seattle. The direct impacts to the economy, to quality of life, and to the health of Elliott Bay, combined with the cost of lost opportunities for this valuable land, add up to an unconscionable cost per vehicle. We believe that the City of Seattle and the Central Puget Sound region will be more vital and more successful if we do not build a new highway along Seattle's central waterfront.

A no-highway alternative – one that improves existing resources in the larger transportation system, and spreads traffic out – is a simpler and more efficient approach. It would offer the mobility we need at a cost we can afford, without a decade of disruption to businesses and residents, and the billion-dollar liabilities of a megaproject. We should not give up our city's most valuable ecological, civic, and economic land for just a highway. We have a once-in-a-century chance to do better, and we owe it to ourselves and our children to be rethink the way we provide stewardship to Seattle's waterfront.

Therefore, we urge you to:

- include a "no-highway" alternative in a supplemental EIS
- separate the seawall project out and pursue its completion with appropriate urgency.

Sincerely,

Cary Moon Grant Cogswell Julie Parrett
Founders, People's Waterfront Coalition

Cc: Hon. Gary Locke, Governor, State of Washington
Hon. Greg Nickels, Mayor, City of Seattle
Seattle City Council
Hon. Ron Sims, Executive, King County
King County Council

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C-021-006

Building a temporary structure on the waterfront during construction is no longer being considered.

C-021-007

For the preferred Bored Tunnel Alternative, the north portal is located at Thomas Street, well north of the Pike Place Market. See the Final EIS for the current alignments of the proposed build alternatives.

C-021-008

The south portal for the preferred alternative would be located near S. Dearborn Street. The south portal would not be expected to physically or visually separate Pioneer Square and the waterfront. Please see Final EIS Appendix E, Visual Simulations, which will show you how the alternatives could look.

C-021-009

The preferred Bored Tunnel Alternative would not have this aerial structure. Also, the design for the Cut-and-Cover Tunnel Alternative has been revised to remove this aerial structure. This alternative now proposes that between Lenora Street and the Battery Street Tunnel, SR 99 would travel in a new lowered roadway (retained cut) section with overpasses at Elliott and Western Avenues and at the Bell Street intersection.

C-021-010

The purpose of the project is to provide a replacement transportation facility. However, the Alaskan Way Viaduct Replacement Project has been coordinating with the City of Seattle's waterfront planning efforts to design the Alaskan Way surface street. For the Bored Tunnel Alternative, the City will lead planning and design of the central waterfront via the Central Waterfront Project.

C-021-011

The Surface Alternative has been eliminated from further consideration as explained in the 2010 Supplemental Draft EIS and the Final EIS because it does not meet the project's purpose and need to provide capacity to and through downtown Seattle. The project has evolved since 2004. Please see the Final EIS for current information about the proposed build alternatives.

C-021-012

The project and the proposed build alternatives have changed substantially since this comment letter was submitted in 2004. Please see the Final EIS for updated information. The preferred alternative, the Bored Tunnel, does not replace the seawall. The Cut-and-Cover Tunnel and Elevated Structure Alternatives do propose to replace the seawall. An updated description of these proposed improvements, their effects, and proposed mitigation is contained in the Final EIS.

C-021-013

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-021-014

Many people asked the lead agencies to consider an alternative that would remove the viaduct and replace it with a four-lane surface roadway along Alaskan Way and include transit improvements. Without a host of improvements and modifications, a four-lane Alaskan Way would create even more congestion on I-5 and downtown streets than the alternatives evaluated in the Draft and Supplemental Draft EISs. Transportation studies performed for this project indicate that replacing the viaduct with a four-lane surface street would substantially increase congestion for most of the day and part of the evening on I-5 through downtown Seattle, downtown streets, and Alaskan Way. On downtown streets, traffic would increase by 30 percent; though traffic increases to specific areas like Pioneer Square and the waterfront could exceed 30 percent. With a four-lane roadway, traffic on Alaskan Way would quadruple to 35,000 to 56,000 vehicles per day compared to about 10,000 vehicles today. This traffic increase would make Alaskan Way the busiest street downtown, carrying more traffic than Mercer Street does today. The increased traffic congestion would also make travel times worse for buses, making transit improvements along these streets largely ineffective. Finally, neighborhoods west of I-5 (Ballard, Queen Anne, Magnolia, and West Seattle) would be less accessible and would face longer commute times.

Replacing the Elliott Bay Seawall would be a separate project if the Bored Tunnel Alternative is selected, because the failing seawall does not have the potential to affect the seismic stability of this alignment. For the other build alternatives (Cut-and-Cover Tunnel and Elevated Structure Alternatives) evaluated in the Final EIS, the seawall replacement is included in the project because its seismic instability threatens the seismic safety of the viaduct and its foundations. Replacing

the seawall for these alternatives will also provide a solid foundation for the design alternative. The seawall is necessary not only to the safety and stability of the viaduct structure but also to protect the waterfront resources and the economic resources and functions that line Seattle's waterfront, including the Port of Seattle's marine container terminal operations, the Seattle Ferry Terminal, and other marine dependent commercial interests.

Please see Chapter 3 in the Final EIS for a description of the current configuration for each alternative in the project area.