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December 9, 2010

Angela Freudenstein  
Alaskan Way Viaduct Replacement Project  
Washington State Department of Transportation  
999 Third Avenue, Suite 2424  
Seattle, WA 98104

Dear Ms. Freudenstein,

On behalf of the Transportation Choices Coalition I would like to submit the following comments on the 2010 Supplemental Draft Environmental Impact Statement for the Alaskan Way Viaduct Replacement Project. The Bored Tunnel Alternative was identified in the SDEIS as the preferred alternative by the lead agencies, therefore our comments focus on issues that need to be considered in order to ensure the viaduct replacement project provides the best mobility benefits for the citizens of Seattle and the region with minimal negative impact on local business, residents or the environment.

C-004-001

**(1) The Project Purpose and Need Statement should be revised to reduce the emphasis on vehicle capacity in order to better align with the state's transportation goals and the Partnership Process principles.**

The project purpose statement changed since the 2006 SDEIS from "maintain or improve mobility, accessibility, and traffic safety for people and goods along the existing Alaskan Way Corridor" to:

- "Reduce the risk of catastrophic failure in an earthquake by providing a facility that meets current seismic safety standards.
- Improve traffic safety.
- Provide capacity for automobiles, freight, and transit to efficiently move people and goods to and through downtown Seattle.
- Provide linkages to the regional transportation system and to and from downtown Seattle and the local street system.
- Avoid major disruption of traffic patterns due to loss of capacity on SR 99.
- Protect the integrity and viability of adjacent activities on the central waterfront and in downtown Seattle."

The reason for the change to the purpose and needs statement is stated in Chapter 3, page 53 in the 2010 SDEIS to "reflect current state and local priorities as expressed through the Partnership Process." The guiding principles of the Partnership Process are:

- "Improve public safety
- Provide efficient movement of people and goods now and into the future
- Maintain or improve downtown, regional, port, and state economies
- Enhance Seattle's waterfront, downtown, and adjacent neighborhoods as a place for people
- Create solutions that are fiscally responsible
- Improve the health of the environment"

We recommend additional revisions to the purpose statement to incorporate the language from the purpose statement from the 2006 SDEIS as well as include key principles developed by the

### C-004-001

Thank you for your suggestions to revise the project's purpose and need statement. FHWA, WSDOT, and the City of Seattle worked extensively to update the project's purpose and need statement to have it reflect project needs and reflect the Partnership Process.

Changes made to the project's purpose and need statement in 2010 did not narrow the scope of concepts that could be considered. Instead the changes that were made allowed for a broader scope of solutions to be considered. The purpose and need statement presented in the 2006 Supplemental Draft EIS stated "the project will maintain or improve mobility, accessibility, and traffic safety for people and goods along the existing Alaskan Way Viaduct Corridor..." This purpose indicated that mobility must be maintained or improved. The project's current purpose and need statement is less restrictive by stating that it will provide a facility that "provides capacity for automobiles, freight, and transit to efficiently move people and goods to and through downtown Seattle". An important difference between the two purposes is that the earlier purpose statement required mobility to be maintained or improved, the updated purpose statement is focused on providing capacity to efficiently move people and goods to and through downtown Seattle, but it doesn't specify that existing capacity must be maintained.

C-004-001

Partnership Process regarding waterfront revitalization and environmental impacts (described in more detail below in points 5 and 2) so that the purpose statement better reflects the need of the region for a transportation system focused on moving people and goods in a safe manner. The purpose statement included in the 2010 SDEIS focuses on capacity of vehicles over people, which discounts the needs of transit users, bicyclists, and pedestrians. These changes will also ensure that the purpose statement for the Alaskan Way Viaduct Replacement Project aligns with the Transportation System Policy Goals listed in Title 47, Chapter 4, Section 280 of the Revised Code of Washington:

- (1) *"It is the intent of the legislature to establish policy goals for the planning, operation, performance of, and investment in, the state's transportation system. The policy goals established under this section are deemed consistent with the benchmark categories adopted by the state's blue ribbon commission on transportation on November 30, 2000. Public investments in transportation should support achievement of these policy goals:*
- (a) *Economic vitality: To promote and develop transportation systems that stimulate, support, and enhance the movement of people and goods to ensure a prosperous economy;*
  - (b) *Preservation: To maintain, preserve, and extend the life and utility of prior investments in transportation systems and services;*
  - (c) *Safety: To provide for and improve the safety and security of transportation customers and the transportation system;*
  - (d) *Mobility: To improve the predictable movement of goods and people throughout Washington state;*
  - (e) *Environment: To enhance Washington's quality of life through transportation investments that promote energy conservation, enhance healthy communities, and protect the environment; and*
  - (f) *Stewardship: To continuously improve the quality, effectiveness, and efficiency of the transportation system."*

We suggest the following language for the purpose statement, which is a hybrid of purpose statement from 2006, the existing Purpose Statement and the principles from the Partnership Process:

- *"Improve mobility, accessibility, and traffic safety for people and goods along the Alaskan Way Corridor now and into the future.*
- *Reduce the risk of catastrophic failure in an earthquake by providing a facility that meets current seismic safety standards.*
- *Provide linkages to the regional transportation system and to and from downtown Seattle and the local street system.*
- *Enhance Seattle's waterfront, downtown, and adjacent neighborhoods as a place for people.*
- *Create solutions that are fiscally responsible*
- *Improve the health of the environment and contribute to meeting city, county and state greenhouse gas reduction goals."*

C-004-002

**(2) The project should support city, county and state efforts to reduce greenhouse gas emissions.**

The City of Seattle, King County and the state of Washington have all made commitments to reduce greenhouse gas emissions. In 2010, the City Council adopted a goal of carbon neutrality. The 2008 King County Comprehensive Plan included the goal to reduce greenhouse gas emissions 80 percent below 2007 levels by 2050. The state's greenhouse gas reduction targets are listed in Title 70, Chapter 235, Section 20 of the Revised Code of Washington:

## C-004-002

The Final EIS estimates the potential direct emissions of greenhouse gases under the build alternatives. Estimates for the potential direct emissions of greenhouse gases under the build alternatives are provided in the Final EIS and Appendix R, Energy Discipline Report. All of the build alternatives would result in a decrease in greenhouse gas emissions, compared to the Viaduct Closed (No Build Alternative).

The study area evaluated includes areas likely to be affected by changes in greenhouse gas emissions as a result of the project. The greenhouse gas effects were estimated for roadways within the city center area, as well as in the region. The city center area is bordered by Prospect Street on the north, 15th Avenue on the east, S. Holgate Street on the south, and Elliott Bay on the west. The region includes all the traffic movements in King, Pierce, Snohomish, and Kitsap Counties.

C-004-002

*"(1)(a) The state shall limit emissions of greenhouse gases to achieve the following emission reductions for Washington state:  
(i) By 2020, reduce overall emissions of greenhouse gases in the state to 1990 levels;  
(ii) By 2035, reduce overall emissions of greenhouse gases in the state to twenty-five percent below 1990 levels;  
(iii) By 2050, the state will do its part to reach global climate stabilization levels by reducing overall emissions to fifty percent below 1990 levels, or seventy percent below the state's expected emissions that year."*

The local and state GHG reduction commitments are reflected in the Partnership Process's inclusion of "Improve the health of the environment" in their principles.

C-004-003

The updated purpose statement fails to include the Partnership Process principle's emphasis on environmental health or mention the state and local commitments to reduce greenhouse gas emissions. The city, county and state recognize the large percentage of total greenhouse gases emitted by the transportation sector. As Chapter 4 of the SDEIS states: "In Washington State, transportation related emissions from cars, trucks, planes, and ships account for nearly half of the state's total greenhouse gas emissions. Vehicles are the most common source of greenhouse gas emissions in the area." The Governor and State Legislature addressed the need to reduce greenhouse gases from transportation in Executive Order 09-05 and in Section 47, Chapter 1, Section 440 of the Revised Code of Washington, which set statewide vehicle miles traveled reduction targets as part of the plan to reduce statewide greenhouse gas emissions. The targets are:

- Decrease the annual per capita vehicle miles traveled by eighteen percent by 2020;
- Decrease the annual per capita vehicle miles traveled by thirty percent by 2035; and
- Decrease the annual per capita vehicle miles traveled by fifty percent by 2050;

None of the alternatives show a reduction in VMT or greenhouse gas emissions for 2015. In fact, all alternatives show an increase, which is inconsistent with state, county and city goals. The identified preferred alternative, the bored tunnel, is projected to increase VMT in the Seattle City Center area by 17% in 2030. The GHG emissions from vehicle use and tunnel operations in 2030 are projected to be 55,836 metric tons of CO<sub>2</sub> a day, which is 16,646 daily metric tons over 2005 emissions. For an investment of this magnitude, which will endure for 30 or more years, significant mitigation measures are necessary in the corridor and elsewhere in the region to ensure the state meets its VMT and GHG reduction targets.

The Puget Sound Regional Council has developed robust and transparent tools to measure greenhouse gas emissions from transportation scenarios on a regional level. We recommend that for the Alaskan Way Viaduct Replacement Project, as well as all major transportation projects in the region, WSDOT work with PSRC to model mitigation plans in order to come up with a set of transportation projects that help the state meet its VMT and GHG reduction goals.

C-004-004

TCC recommends mitigation options include, but not be limited to, projects such as increased CTR investments in the corridor, support of GTEC programs like Commute Seattle, investments in increased bicycle and pedestrian infrastructure in the corridor, investments in transit operations in the corridor, and investments in capital projects including the proposed Waterfront or 1<sup>st</sup> Ave. Streetcar.

C-004-005

**(3) The project should include ongoing funding for additional transit service, including during construction.**

The "Consensus on the Recommended Alternative for Replacing the Alaskan Way Viaduct and Seawall" letter of agreement signed by Governor Gregoire, County Executive Sims, and Mayor Nickels in January 2009 identified additional transit service as part of the recommended alternative for replacing the Viaduct. The letter assigns King County responsibility for this aspect of the project and

### C-004-003

The Final EIS examines the project-level effects on GHG emissions. Although not per capita, the Final EIS estimates the potential direct emissions of greenhouse gases under the build alternatives for the years 2015 and 2030. The study area evaluated includes areas likely to be affected by changes in greenhouse gas emissions as a result of the project. The greenhouse gas effects were estimated for roadways within the city center area, as well as in the region. The city center area is bordered by Prospect Street on the north, 15th Avenue on the east, S. Holgate Street on the south, and Elliott Bay on the west. The region includes all the traffic movements in King, Pierce, Snohomish, and Kitsap Counties.

Estimates for the potential direct emissions of greenhouse gases under the build alternatives are provided in the Final EIS and Appendix R, Energy Discipline Report. All of the build alternatives would result in a decrease in greenhouse gas emissions, compared to the Viaduct Closed (No Build Alternative). WSDOT is currently participating in a statewide effort, lead by the Department of Ecology, to draft planning-level guidance at the region, state, and/or national transportation systems level.

Vehicle miles traveled (VMT) would be slightly reduce with the TOLLED Bored Tunnel Alternative when compared to totals for the 2015 Existing Viaduct. This reduction is likely due to a disincentive of trip making caused by increased traffic and congestion on city streets since roughly 100,000 daily trips on SR 99 would need to be accommodated by local street capacity, I-5, transit, or biking and walking.

### C-004-004

The improvements cited in this comment do not address the purpose and need established for this project. These programs are included in transportation models to the extent they have been adopted by the

**C-004-005** states that the city, county and state will seek legislative authority for King County to implement a 1% Motor Vehicle Excise Tax to help fund the additional transit service. The promise of this legislation has yet to be fulfilled.

King County is currently undergoing a transit funding crisis. The King County Regional Transit Task Force was created in February 2010 to develop recommendations on future growth and potential cutbacks in transit service. Recommendation 6 focuses on the need to pursue state legislation to create additional long-term, sustainable revenue sources for transit.

The advancement of the Viaduct Replacement Project and current transit funding crisis make it a particularly critical time to secure a new source of transit funding for the county and transit agencies across the state. The project budget should include funds for transit mitigation in order to maintain the speed and reliability of transit service in the corridor during and after construction. The state, city and county must redouble their efforts to pass and sign legislation to provide state funds for transit and allow local governments to raise additional revenue through sources such as an MVET. The Alaskan Way Viaduct Replacement Project should include a plan and timetable for securing additional funds for transit through state legislation so that transit agencies can better plan for future service. Additional transit service is also key to maintaining mobility along the corridor in the case of an early closure of the Viaduct for safety reasons (this is described in further detail in point 7).

**C-004-006** **(4) Tolling should be a part of the project, but it must be part of a comprehensive regional pricing and demand management strategy.**

We believe that pricing strategies are an essential part of the transportation financing toolbox and that tolls should be a part of any new transportation project in the Puget Sound. However, the SDEIS indicates that tolling on only one highway, which is proposed in the bored tunnel alternative, will drive traffic to city streets and non-tolled highways. Therefore, we recommend that the city and WSDOT evaluate tolling of the replacement project as part of a comprehensive regional pricing and demand management strategy to ensure city streets are not forced to carry the additional 40,000 to 45,000 cars a day that are estimated in the SDEIS to come from using tolls in the tunnel. Additional transit service must also be included in any proposal to toll in this corridor to ensure the city maintains a socially and economically equitable transportation system.

**C-004-007** **(5) The project should ensure access to and from downtown without burdening city streets.**

The current configuration of the Alaskan Way Viaduct provides important access to downtown Seattle through several on and off ramps. The current placement of tunnel entrances for the bored tunnel alternative takes away the direct access to downtown supplied by the Viaduct. The result will be increased vehicle volumes on downtown streets and Alaskan Way. The SDEIS estimates that 50,000 cars a day will use the southern interchange ramps and 29,000 of the current Viaduct users will shift to local streets with the bored tunnel alternative. As mentioned above, an additional 40,000 to 45,000 users will switch to local streets if the tunnel is tolled. The SDEIS estimates that Alaskan Way will carry an additional 35,000 cars a day.

The SDEIS and FEIS need to more thoroughly evaluate the affect of the bored tunnel on city streets and provide specific plans for mitigating any additional traffic. The city and WSDOT should use increased investments in transit and bicycle and pedestrian infrastructure and aggressive Transportation Demand Management and Commute Trip Reduction programs to minimize the impact on local streets. The bored tunnel project must protect the character of the neighborhoods surrounding it and ensure that the environmental for pedestrians and bicyclists on cities streets is improved, not diminished.

relevant transportation agency.

In the south portal area, bicycle and pedestrian conditions would be improved by replacing the existing 15-foot-wide Waterfront Bicycle/Pedestrian Facility currently located on the east side of Alaskan Way S. with the new 25-foot-wide City Side Trail that would be constructed east of Alaskan Way S. between S. Atlantic Street and S. King Street. In the north portal area, Aurora Avenue would be built to grade level between Denny Way and John Street. John, Thomas, and Harrison Streets would be connected across Aurora Avenue with signalize intersections at Denny Way and John, Thomas, and Harrison Streets. The new cross streets would be signalized and have sidewalks on both sides, which would be an improvement for pedestrians. Chapter 8 Mitigation, discusses the mitigation commitments that will be made by the lead agencies.

#### **C-004-005**

The agreement signed by the Governor, County Executive, and Mayor in January 2009 described a program of independent yet complementary projects for replacing the Alaskan Way Viaduct and providing a strategy for overall mobility in Seattle. The State is responsible for replacing the viaduct, the City for the seawall and central waterfront, and the County accepted responsibility for additional RapidRide and express bus service, with some identified as construction mitigation. These future transit service improvements have benefits independent of replacing the Alaskan Way Viaduct. WSDOT recognizes the funding anticipated in the agreement has not been realized, and that the recent economic downturn has reduced other funding sources King County currently relies on for providing transit service throughout King County.

Currently WSDOT is providing funding for King County on the S. Holgate Street to S. King Street Viaduct Replacement Project to provide additional transit service hours to help mitigate the effects of

**(6) The project must ensure Alaskan Way does not become a high-speed thoroughfare in order to create an enhanced waterfront.**

C-004-008

A vital goal of the city, county and state in considering an alternative to the current Viaduct is to reconnect and revitalize the waterfront. The current language in the Purpose Statement to "Protect the integrity and viability of adjacent activities on the central waterfront and in downtown Seattle" speaks to protecting the waterfront's current uses. However, it does not adequately speak to the need of the Viaduct replacement to contribute to an enhanced and revitalized waterfront.

A key strategy to revitalizing the waterfront is to create an Alaskan Way that is inviting to pedestrians and bicyclists of all ages and abilities and that positively contributes to the waterfront setting. As mentioned previously, an additional 35,000 cars a day are expected to use Alaskan Way as a result of the bored tunnel. Additional freight traffic is also expected on Alaskan Way. Turning Alaskan Way into a high volume wide street that primarily serves fast through traffic will hurt the waterfront redevelopment efforts. Narrow lane widths and traffic calming measures should be employed to ensure Alaskan Way is a safe and pleasant street.

**(7) The lead agencies should create and publicize an early viaduct closure plan.**

C-004-009

Safety concerns could require closure of the Viaduct before the replacement project is completed. The lead agencies should create and publicize an Alaskan Way Viaduct early closure transportation plan that could be implemented in this instance in order to ensure transportation users in the region can still meet their mobility needs. Increased transit service should be a vital component of this plan.

Thank you for the opportunity to comment on the Supplemental Draft Environmental Impact Statement. Robust public outreach and input is vital for this project to succeed. We look forward to following the project as it moves forward to ensure it creates the sustainable, equitable, multi-modal transportation system that Seattleites and Washingtonians demand.

Sincerely,



Rob Johnson  
Executive Director  
Transportation Choices Coalition

construction. This program is ongoing and regularly monitored to evaluate its effectiveness. For the Alaskan Way Viaduct Replacement Project, WSDOT will continue to evaluate the need for increased bus service in the West Seattle, Ballard, Uptown, and Aurora Avenue corridors during the initial portions of the construction period, as well as a bus travel time monitoring system. WSDOT will also work with the County to identify funding sources for the service originally contemplated in the January 2009 agreement.

**C-004-006**

Long-range planning documents, such as the Puget Sound Regional Council's (PSRC's) long-range transportation plan, *Transportation 2040*, have identified system-wide highway tolling as a means to control congestion and a funding source for future transportation projects as revenues from taxing gasoline continue to diminish. WSDOT is working with PSRC to implement the vision for system-wide tolling as discussed in *Transportation 2040*, but implementing that vision is long-term and will require additional legislative authority.

The agreement signed by the Governor, County Executive, and Mayor in January 2009 described a program of independent yet complementary projects for replacing the Alaskan Way Viaduct, and providing a strategy for overall mobility in Seattle. The State is responsible for replacing the Viaduct, the City for the seawall and central waterfront, and the County accepted responsibility for additional RapidRide and express bus service, with some identified as construction mitigation during the central waterfront phase of the viaduct program. These future transit service improvements have benefits independent of replacing the Alaskan Way Viaduct. WSDOT recognizes the funding anticipated in the agreement has not been realized, and that the recent economic downturn has reduced other funding sources King County currently relies on for providing transit service throughout King County.

Currently WSDOT is providing funding for King County on the S. Holgate to S. King Street Viaduct Replacement Project to provide additional transit service hours to help mitigate the effects of construction. This program is on-going and regularly monitored to evaluate its effectiveness. For the Alaskan Way Viaduct Replacement Project, WSDOT will continue to evaluate the need for increased bus service in the West Seattle, Ballard, Uptown, and Aurora Avenue corridors during the initial portions of the construction period, as well as the need for a bus travel time monitoring system. WSDOT will also work with the County to identify funding sources for the service originally contemplated in the January 2009 agreement.

**C-004-007**

With the Bored Tunnel Alternative, traffic using the Stadium area ramps to access downtown would disperse over several city arterials, including the improved Alaskan Way, First, Second, and Fourth Avenues. Traffic analysis indicates that this arrangement would result in comparable or better overall traffic distribution and flow than is experienced with the current Columbia and Seneca Street ramps. This is because the current ramps concentrate traffic to a single, congested location in the central downtown. The relocated ramps would instead allow drivers to diffuse through the street grid using many different paths.

Because operational effects of the built alternative would be substantially better than the Viaduct Closed (No Build Alternative), long-term transportation mitigation measures are not anticipated. However, a number of mitigation measures in place during construction could have benefits over the longer term. Refer to Chapter 8 Mitigation in the Final EIS for details.

**C-004-008**

The project's purpose and need statement to "protect the integrity and viability of adjacent activities on the central waterfront and downtown

Seattle" speaks to both current and future uses along the waterfront. That adequately reflects the purpose of this project. Revitalizing the waterfront and roadway design for Alaskan Way is a project that is being lead by the City of Seattle. The City's efforts on the waterfront will have its own environmental process and opportunities for public input and dialogue.

**C-004-009**

WSDOT and the City of Seattle developed an emergency closure plan for the Alaskan Way Viaduct in 2005. As part of the plan, WSDOT installed an automated viaduct closure gate system that will enable the viaduct to be closed within minutes of detecting a significant earthquake. The Alaskan Way Viaduct Emergency Closure Plan is available online at <http://www.seattle.gov/transportation/viaductemergencyclosure.htm>