



December 13, 2010

Ms. Angela Freudenstein
Washington State Department of Transportation
Alaskan Way Viaduct Replacement Project SDEIS
999 Third Ave., Suite 2424
Seattle, Washington 98104

Dear Ms. Freudenstein:

Subject: Comments on the *Second Supplemental Draft Environmental Impact Statement (SDEIS) for the Alaskan Way Viaduct Replacement Project October 2010*

Sent via email to: freuda@wsdot.wa.gov

Thank you for the opportunity to comment on the *Second Supplemental Draft Environmental Impact Statement (SDEIS) for the Alaskan Way Viaduct Replacement Project*. Futurewise is a statewide public interest group with members throughout Washington State. Our mission at Futurewise is to promote healthy communities and cities while protecting working farms, working forests, and shorelines for this and future generations.

We are commenting on the SDEIS because major transportation facilities directly affect the future of our communities. Futurewise does not have a position on any of the alternatives being considered for the Alaskan Way Viaduct Replacement, except that we do oppose a replacement aerial structure on the central waterfront because of its adverse impacts on the city and environment. We do agree the viaduct needs to be removed to protect the public safety and to reclaim the central Seattle waterfront.

C-014-001

The Supplemental Environmental Impact Statement must have a 2040 planning horizon and address the larger transportation context

As our scoping comment letter recommended, the environmental impact statement (EIS) must have a 2040 planning horizon and address the larger transportation context. WAC 197-11-440(6) requires that an SEIS shall describe and analyze the impacts on the elements of the environment that will be significantly affected by the proposal. This includes transportation systems.¹ The region's adopted transportation plan, *Transportation 2040*, uses a 2040 horizon year. This is an appropriate planning horizon for a project of this magnitude; the bored tunnel will certainly be in use in 2040.

¹ WAC 197-11-444(2)(c).

C-014-001

The analysis conducted for the 2010 Supplemental Draft EIS and the Final EIS consider transportation impacts for the year 2040. The detailed discussion of how the the Puget Sound Regional Council's *Transportation 2040* plan was considered in our analysis is discussed in Appendix C, Transportation Discipline Report. The year 2030 was used as the transportation horizon year because a 20-year planning horizon is consistent with FHWA and WSDOT's analysis and planning efforts for our projects. It is also consistent with other transportation work being done in the region (such as the SR 520 and I-405 corridors) and the state.

C-014-001

Using 2040 as the horizon year will allow the EIS to benefit from the data available through the development of *Transportation 2040*. The Puget Sound Regional Council (PSRC) is the designated regional transportation planning organization (under state law) and metropolitan transportation planning organization (under federal law) for King, Kitsap, Pierce, and Snohomish counties and the cities in those counties. The *Transportation 2040* forecasts are based on updated information on the region's growth strategies, providing a critical link between land use and transportation planning. The *Transportation 2040* studies also include analysis on pricing and the transportation system--how user fees, including tolls, affect transportation demand and revenues. This information is critical to an informed decision on the SR 99 replacement options.

Using a 2040 horizon will also allow the SEIS to be placed in the larger regional transportation context. The alternatives in the EIS must be considered as part of the larger transportation system within the Seattle region. This includes the I-5 improvements including active traffic management, new managed lane capacity, and changes to lane configurations and on and off-ramps. In addition, options that significantly increase transit service and user fees (tolling) on state highways must be included within the document. The SEIS should analyze as alternatives the transportation options considered by the AWW Stakeholder Advisory Committee. The bored tunnel cannot be considered as an isolated corridor.

C-014-002

The Supplemental Environmental Impact Statement must analyze consistency with the state greenhouse gas (GHG) reduction requirements

Other elements of the environment that SEIS that must consider are air quality and climate.² RCW 70.235.020(1)(a) limits greenhouse gas emissions in Washington State to no more than the 1990 level by 2020, to 25 percent below the 1990 level by 2035, and to 50 percent below the 1990 level by 2050, or 75 percent below the state's expected emissions that year. The purpose of these limits is to protect air quality and to address climate change.³

While we appreciate the CO₂ emission estimates in the *Appendix Q Air Quality Discipline Report*, the emissions were not analyzed for their consistency with the limits in RCW 70.235.020(1)(a). The EIS must include this analysis and disclose whether the alternatives are consistent with the reduction requirements. The selected alternative should be part of a program to achieve the transportation sector's fair share reductions of greenhouse gas emissions so the state can meet the limits adopted by the legislature and signed by the governor in RCW 70.235.020(1)(a). The SEIS must show how the selected alternative can be altered to meet this requirement. This topic was included in our letter commenting on the scope of the SEIS.

² WAC 197-11-444(1)(b)(i) and (ii).

³ RCW 70.235.005.

C-014-002

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).

State agencies are to meet these greenhouse gas emission limits over time, but individual projects are not obliged to prove consistency with RCW 70.235 as asserted in this comment.

C-014-003

The Supplemental Environmental Impact Statement must analyze consistency with the state vehicle miles traveled (VMT) reduction benchmarks

Related to the air quality and climate elements of the environment are Washington State's vehicle miles traveled (VMT) reduction benchmarks. They are also related to vehicular traffic.⁴

RCW 47.01.440 includes benchmarks for decreasing annual per capita vehicle miles traveled by 18 percent by 2020, 30 percent by 2035, and 50 percent by 2050. The EIS must estimate per capita vehicle miles traveled for the alternatives and disclose whether the estimates are consistent with the benchmarks. The selected alternative should be part of a program to achieve the benchmarks adopted by the legislature and signed by the governor in RCW 47.01.440. The SEIS must show how the selected alternative can be altered to meet this requirement. This topic was also included in our letter commenting on the scope of the SEIS.

C-014-004

The Supplemental Environmental Impact Statement should use the statement of purpose and need from the 2006 Supplemental Draft Environmental Impact Statement (SDEIS)

The SEPA rules, in WAC 197-11-060(3)(a)(iii), provide that "proposals should be described in ways that encourage considering and comparing alternatives." One important way to encourage the comparison of alternatives is to have a broad purpose and need statement. To aid the consideration and comparison of alternatives, we recommend that the statement of purpose and need from the 2006 SDEIS should be substituted for the third and fifth bullets under the "Purpose and Need for the Proposed Action" on page 4 of Chapter 1. That purpose and need statement was "[t]he project will maintain or improve mobility, accessibility, and traffic safety for people and goods along the existing Alaskan Way Viaduct Corridor." So the third bullet should read:

- Maintain or improve mobility and accessibility for people and goods along the existing Alaskan Way Viaduct Corridor.

The fifth bullet could then be deleted. Focusing on the movement of people and goods will allow a broader consideration of alternatives than the new purpose statement which focuses "capacity" for traffic. This better fits the requirement to consider and compare a board range of alternatives.

⁴ Designated by WAC 197-11-444(2)(c)(ii) as an element of the environment which must then be considered in an EIS as required by WAC 197-11-440(6).

C-014-003

The law setting the VMT benchmarks directs WSDOT to "adopt broad statewide goals to reduce annual per capita vehicle miles traveled by 2050 consistent with the stated goals of executive order 07-02. The state law does not require individual projects to set VMT reductions. WSDOT is working on this task and related tasks in Executive Order 09-05 in conjunction with a working group established for this purpose because the cumulative greenhouse gas impacts of transportation projects are best addressed at a system-wide level where multiple projects can be analyzed in aggregate, such as in regional transportation plans. This project is included in PSRC's Regional Transportation Plan, *Transportation 2040*, which considered greenhouse gas emissions along with other transportation objectives.

The VMT reduction law enacted in 2008 refers to a report detailing strategies to meet the law. This report was released in January 2011. Although the report does not identify specific requirements any project must implement, the potential approaches identified in Appendix D of the report indicate that strategies are being investigated at the regional and state level rather than on a project-by-project basis. For further information regarding sustainable transportation practices at WSDOT please refer to the WSDOT website.

C-014-004

Changes made to the project's purpose and need statement in 2010 did not serve to 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

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Thank you for considering our comments. If you require additional information please contact me at 206-343-6081 Ext 118 or tim@futurewise.org

Sincerely

A handwritten signature in blue ink, consisting of a stylized 'S' shape with a vertical line through it, and a horizontal line at the bottom.

Tim Trohimovich, AICP
Co-Director of Planning & Law

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.