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Hand Delivered

WSDOT
Attn: Angela Freudenstein, Project Environmental Manager
AWV Project Office (Wells Fargo Building)
999 Third Avenue S. Suite 2424
Seattle, WA 98104-4019

Re: Comments of the Seattle Historic Waterfront Association on the 2010 Draft Supplemental EIS for the Alaskan Way Viaduct Replacement Project

Dear Ms. Freudenstein:

Thank you for the opportunity to comment on the October 2010 Draft Supplemental EIS (DSEIS) for the Alaskan Way Viaduct Replacement Project. These comments are submitted on behalf of the Seattle Historic Waterfront Association and its members, who are the owners of the private piers and the businesses within and alongside those piers in the Central Waterfront of downtown Seattle.

C-017-001

The members of the Seattle Historic Waterfront Association have been vitally interested in the development of the Alaskan Way Viaduct Replacement Project over the years since the Nisqually earthquake because being located waterward of Alaskan Way, they stood at risk that the construction process would result in the destruction of their businesses. We must complement the Project Team on the current state of the replacement project. This is an instance where the National and State Environmental Policy Acts have accomplished what they were intended to accomplish. Although the process has been long, at times frustrating, and fraught with extremely difficult issues, the Project Team has responded to the public reaction to the alternatives put forward in the March 2004 Draft EIS and the July 2006 Draft Supplemental EIS by recognizing that those proposals had such significant adverse environmental impacts that could not be reasonably mitigated, that the proposals had to be considered unacceptable and a completely new approach needed to be developed. The deep bore tunnel proposal that is now the preferred alternative is not without impacts, but its adverse impacts are vastly reduced over those that would have occurred under any of the other alternatives. In short, this is a proposal to replace the viaduct that not just the Seattle Historic Waterfront Association members, but the City of Seattle as a whole, can survive.

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C-017-001

Thank you for your continued participation in the Alaskan Way Viaduct and Seawall Replacement Program. Stakeholder feedback and public participation since 2001 has helped move the program forward and shaped the preferred alternative.

C-017-002 The DSEIS drives home another point, which is that "no action" is not an option. To the extent that the current status quo has advantages for some people over the deep bore tunnel, that current status quo is not the "no action" alternative, because the viaduct must either be shut down, or it will fall down, in the very forseeable future. Shutting it down will leave the City in gridlock, and will, before a replacement can be constructed, have caused the relocation of businesses dependent upon the ability to move people and goods in Seattle and the loss of visitors to the region who are discouraged from coming here by the extent of the traffic congestion that will result. In light of the reality that the viaduct must be replaced as quickly as possible in order to avoid its collapse or unplanned closure, the members of the Seattle Historic Waterfront Association urge the Project Team to promptly complete the NEPA/SEPA process so that construction of the deep bore tunnel can commence.

Comments on the Selection of the Preferred Alternative

C-017-003 There is no easy or entirely painless way to thread a major highway through the heart of a great 21st century city. When the Alaskan Way viaduct was built, the hearts of cities were gritty, noisy places of industry that people attempted to escape from after the work day. In the early 21st century, cities have become where people work, live and play on a 24/7/365 basis. Great downtowns are destinations, not places to flee. It is critical if we are to limit carbon emissions and consumption of natural resource lands that cities like Seattle continue to attract density and vitality.

In light of those changes in the way cities function, the Alaskan Way viaduct currently passes through the most sensitive part of early 21st century Seattle, along the entire waterfront of the city's downtown core, cutting off the commercial heart of the city from its waterfront, and creating visual blight, noise and dirt that detract from the Central Waterfront, which has over the last few decades become a major destination for visitors to Seattle. (We appreciate that the DSEIS, p. 5, recognizes that the current waterfront is a vibrant neighborhood of shops, restaurant, homes and recreational and educational opportunities, which makes a significant contribution to Seattle's status as a world-class city, but which is blighted by the viaduct. More than $300 million of capital investments have been made along the Central Waterfront in the past decade by the Aquarium, the hotels, the port, restaurants and pier owners. Earlier EISs seemed to assume that the current waterfront remained in its mid-20th century form, ripe for becoming something once the viaduct is removed, but currently safe to ignore. That characterization was inaccurate.)

Replacement of the viaduct with the deep bore tunnel will have some significant adverse impacts, which we believe the DSEIS fairly and adequately describes, but they pale by comparison to the adverse impacts of the various other alternatives that were considered in the

C-017-002

The lead agencies agree that the Viaduct Closed (No Action Alternative) is not acceptable and are working to obtain a Record of Decision and begin construction on the project as soon as possible.

C-017-003

Thank you for your comments on the preferred alternative. The selection of the preferred alternative is described in Chapter 3 of the Final EIS.

C-017-003 2004 and 2006 EISs, and to the Surface + Transit Hybrid considered as part of the Stakeholder process described on pp. 49-54 of the DSEIS.

C-017-004 One of the most important things that was learned from the earlier EISs was that it was not only destruction of the businesses of Seattle Historic Waterfront Association that would result from the impacts of the construction process for the alternatives originally proposed. The cost in lost jobs and business closures to the region's economy of an extended closure of SR 99 as part of the viaduct replacement could far exceed the cost of the construction of the replacement itself. That is not just from the cost to the users of SR 99, but from the consequences of the congestion that closure of SR 99 would cause to the streets of downtown Seattle and to I-5. The November 2006 Alaskan Way Viaduct Replacement Economic Impact Research Report prepared by Hebert Research, Inc. estimated the annual economic impact from closure of SR 99 and the resultant congestion on I-5 and on the surface streets of Seattle at $3.2 billion ($2.06 billion per year for partial closure). That cost can be estimated in dollars, but it would play out in closed shops along Seattle's downtown streets as congestion made the shops too hard to get to and the sidewalks unpleasant to stroll, businesses relocating from Seattle because it was too hard to get employees to them, construction delayed or cancelled because of the added cost of getting goods and equipment to sites in downtown, and the Port of Seattle being put at a competitive disadvantage relative to other major ports by congestion clogging the approach to its major terminals. The deep bore tunnel is the only alternative that can keep the closure of SR 99 to an acceptable 3 weeks, with occasional night and weekend closures, as compared to 27 to 42 months of closure for the cut and cover tunnel, 6 months of closure with 5 years of substantial lane restrictions for the elevated structure, and permanent closure for the Surface + Transit alternative. DSEIS p. 201. While we do not disagree that the long-term need to replace the capacity provided by the viaduct is so great that the region must accept the pain of the construction process, we believe the critical concept is found in the statement on p. 5 of the DSEIS that "there is a need to replace the existing viaduct in a manner that minimizes disruption of traffic patterns by minimizing the time lapse between closure of the existing viaduct and opening of a replacement facility or facilities." Replacement of SR 99 cannot be allowed to be the cause of a self-inflicted recession, as the alternatives proposed in the 2004 and 2006 environmental documents would have caused.

Much of the traffic analysis in the various EISs has focused on vehicles carried per day or per AM or PM peak period, vehicle miles traveled, vehicle hours of delay, and person throughput. While that is standard traffic analysis, and allows for important comparisons among alternatives, it misses a key fact about transportation systems in the 3-county Central Puget Sound Region. That is the extent to which Seattle's hour glass shape and water edges causes downtown Seattle to be a bottleneck to be passed through, not the destination, for components of users of the transportation system that are vital to our economy. Exhibit 4-38, page 101 of the Transportation

C-017-004

FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the Bored Tunnel Alternative.

C-017-004 Discipline Report, partially illustrates this issue by showing that the City of Seattle's two industrial areas are to the north and to the south of downtown Seattle. Those industrial areas account for hundreds of millions of dollars of household income, and billions of dollars of revenues in the City of Seattle, and many of those businesses depend on the ability to move people and freight between the two industrial areas. Limiting the consideration of the need for traffic to pass through downtown Seattle without being impeded by downtown to just the boundaries of Seattle misses a larger regional issue, however, which is that the region's iconic aerospace and maritime industries are also located both south and north of downtown Seattle, and it is essential that they be able to move people and goods from their southern nodes in SODO and Renton and around Boeing Field to their northern node around Ballard and Paine Field. Other major industries likewise have a continuing need to move people and goods from north of downtown to south of downtown Seattle and vice versa. I-5, which is the other major north-south arterial, is at virtually full capacity, and currently experiences increasing peak periods during which speeds are often reduced to a crawl. SR 99 is the only major north-south corridor with remaining capacity, and thus becomes critical to businesses that require north-south mobility for people and goods. If we have learned anything from the economic downturn of the last three years it should be that industrial jobs are precious to a community. In planning its transportation systems, a region must not only move people to and from jobs in their central business districts, but must preserve the required mobility for their industries. With the unique geography of Seattle, that requires providing transportation corridors that can get through downtown Seattle without being impeded by it. In that regard, while the deep bore tunnel is not ideal, particularly in the way that traffic to and from the Ballard/Magnolia/Interbay area is handled, it nonetheless both avoids extended shut down of SR 99 during construction, and also maintains through-capacity for the long term.

C-017-005 For much the same reason we believe the deep bore tunnel is the only logical outgrowth of the environmental analysis that has preceded it, we agree with the analysis that led to exclusion of the Surface + Transit alternative from further detailed study as an alternative in the EIS. As shown by the traffic analysis in Attachment A to the Transportation Discipline Report,[1] by every measure the Surface + Transit alternative produces markedly poorer performance than the deep bore tunnel, with fewer vehicle miles traveled, over more hours, with more hours of delay, and

[1] The EIS would have been better if it were easier to find the traffic analysis comparing the Surface + Transit alternative to the deep bore tunnel, and if the analysis which the Project Team developed and presented to the Stakeholder process were included as well. The FEIS should make the location of that analysis known in response to question 5 on page 4, because there has been enough public focus on the Surface + Transit alternative so that readers should be quickly directed to the analysis that led to its exclusion as an alternative for full consideration in the DSEIS.

C-017-005

Your analysis is consistent with the lead agency's findings regarding the "Surface + Transit" concept.

C-017-005

fewer people moved. *See*, Appendix C, Attachment A, pp. A-8 and A-9. When fewer people are spending more hours to go fewer miles, that also translates into cars, busses and trucks idling on clogged streets and freeways, which maximizes their greenhouse gas production.[2] An important difference between the Surface + Transit alternative and the deep bore tunnel that is not fully reflected in the analysis is the impact on critical through-traffic. As suggested on p. A-21 of Attachment A to Appendix C, travel times for through traffic would rise by 50% or more for some of the modeled through trips. With the deep bore tunnel, trips that need to get through downtown Seattle will continue to have two routes, not just I-5, which is at capacity and facing increasing hours of congestion, but also SR 99. For businesses for which time is money, the increases in trip times that would be experienced with the Surface + Transit alternative would be expected to result in businesses relocating to where their transportation costs are more manageable. As the City of Seattle struggles to emerge from the current recession, it is critical that it replace the capacity of SR 99 in a manner that encourages future economic growth rather than making that growth impossible.

Finally it is important to highlight the comparison of the impacts of the Surface + Transit and the deep bore tunnel on streets within downtown Seattle. By 2030 congestion will have grown under any scenario. But as congestion becomes a greater and greater deterrent to coming to downtown Seattle, and as congestion on the streets makes life on the adjacent sidewalks less pleasant, marginal differences in levels of congestion will have a disproportionate adverse impact on the environment. In that light, the comparison on pp. A-17 to A-20 of the number of 2030 intersections within the project area at level of service E and level of service F shows the adverse impact of the Surface + Transit alternative on the quality of life and economic vitality of downtown Seattle.

Surface + Transit		Deep Bore Tunnel	
a.m. peak hour	p.m. peak hour	a.m. peak hour	p.m. peak hour
LOS E = 11	LOS E = 5	LOS E = 5	LOS E = 5
LOS F = 11	LOS F = 10	LOS F = 1	LOS F = 8

[2] Because the public may assume that removing a highway has a positive impact on greenhouse has emissions, the FEIS might provide an analysis of greenhouse gas emissions from the Surface + Transit alternative as compared to the deep bore tunnel alternative.

C-017-005

Total E + F = 22	Total E + F = 15	Total E + F = 6	Total E + F = 13

C-017-006

If one could look past the impacts of the construction closure that the elevated alternative would cause, and as described above, we do not believe you can look past those impacts, one could argue that the elevated alternative would have the same benefit as the deep bore tunnel has of protecting through traffic needing to get from one side of Seattle to the other, and indeed would better serve the Ballard/Magnolia/Interbay area than the deep bore tunnel will serve that area. We agree, however, with the rejection of the elevated alternative, because it loses the once-in-a-lifetime opportunity to reconnect downtown Seattle to its waterfront, and also exacerbates the blighting effect of SR 99 on the Seattle waterfront itself. As described above, this is a highway being threaded through a world class 21st century city. When Seattle's waterfront was a shipping, warehouse and industrial center, the noise, dust, vehicle emissions and visual blight of the viaduct were consistent with the neighborhood it passed through. But the nature of 21st century cities is very different. Because we must concentrate more and more people within urban areas, it is increasingly critical that cities make the most of their natural assets. Recent estimates are that 57,000 people now reside in downtown Seattle, most of them in median or low-income households. There is very little open space in the downtown area. In that context, one can simply not discount the benefit to the city and region as a whole to reconnecting downtown Seattle to its waterfront. The Central Waterfront has become an attraction for visitors to Seattle, and removal of the blighting influence of the viaduct will enhance its attraction. Reconnecting the waterfront to the rest of downtown Seattle will make it the park and amenity for all of downtown that will encourage the continued development of downtown Seattle as a place to live, work and play.

Parking Must Be Replaced as the Project Team Has Promised

C-017-007

There is one area where we believe the DSEIS is grossly inadequate, and that is in its discussion of parking, pp. 33, 118, 156. Although not the purpose of the structure, the Alaskan Way viaduct currently provides up to 1100 spaces of covered parking serving the Central Waterfront. Removal of the viaduct will also remove that parking, not just during construction but, without further action, permanently. That is a significant adverse impact that must be mitigated. The only discussion of parking mitigation is in Chapter 6, which deals with mitigation during construction, but the removal of parking when the viaduct is torn down will be permanent, and requires permanent mitigation.

The parking mitigation approaches discussed on p. 156 will reduce congestion from drivers in the central business district circling in search of parking spots. Mitigation such as e-Park

C-017-006

The preferred Bored Tunnel Alternative would remove the existing viaduct, which would help the waterfront to feel more connected to downtown Seattle. The Central Waterfront Project lead by the City of Seattle will determine the final configuration of Alaskan Way.

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The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated $30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide frequent parking updates
- Establish a construction worker parking policy that is implemented

C-017-007

programs and the Seattle Parking Map are not likely, however, to mitigate the loss of parking that the businesses along the Central Waterfront depend upon. As we have discussed in our comments on the two previous EISs and in our scoping comments on this DSEIS, parking actually located within close proximity (within eye contact) to the waterfront is critical to the vitality of the businesses along the Central Waterfront. A very substantial portion of the visitors to the Central Waterfront are from out of town and arrive by car and they need to "park within sight" of their destination. Market research performed by Argosy and Ivar's over the past 12 years indicates that 69% in summer and 59% in winter arrive by car in family groups. They are not familiar with the city, and they do not navigate the city well. These multi-generational family groups include children in strollers and grandparents as part of the group. These are not people who will park at the convention center or stadiums and walk or bus to the waterfront. Transit on east-west routes is virtually non-existent to reach the waterfront, and the steep slope of the sidewalks impedes pedestrians to the waterfront. The Pike Place Market parking garage, the only major public parking along the Central Waterfront that is certain to survive the viaduct removal, is often full during the summer months with people visiting the Pike Place Market, and thus does not provide readily accessible parking to replace the parking lost on the Central Waterfront.

In our now several years of discussion with the Project Team, we have always been told, dozens of times, that the Project Team had allocated $30 million to build a parking structure along the waterfront. While that is not enough money to replace anything like all the parking spaces that will be lost, it is essential to mitigate the loss of parking on the waterfront. We see no reference to that mitigation now, and it needs to once again be part of the mitigation program. We support the City's efforts to limit the use of available parking to visitors, rather than commuters. But it is essential that a significant amount of visitor parking be available and visible along the Central Waterfront if the City wishes to maintain viable businesses along the waterfront and maximize attraction of the public to the newly opened public space that removal of the viaduct will enable.

Tolling Effects Remain Uncertain

C-017-008

Because the issue of tolling has been part of the public discussion for some time now, we want to comment briefly on the DSEIS's discussion of tolling. It would be useful for WSDOT to include its January 2010 study "SR 99 Alaskan Way Viaduct Replacement Updated Cost and Tolling Summary Report to the Washington State Legislature" as an appendix to the FSEIS, so that it is readily available to the public. At the same time, it must be recognized that any discussion of the impact of tolling on traffic diversion is quite speculative at this point because

by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

C-017-008

Chapter 5 of the Final EIS includes analyses for each of the alternatives both with and without tolls. How tolls might be implemented as part of the proposed action will be refined further should the state legislature authorize tolls. The potential effects resulting from analyses described in Chapter 5 of the Final EIS represent a conservative tolling analysis meaning that we anticipate expect effects will be notably less than described in the Final EIS.

The tolling scenario evaluated is generally conservative in that the rates are higher than other tolling scenarios so the amount of diversion is correspondingly higher. As your comment notes, there are many other factors in play that could affect how tolling is actually applied to this project. By addressing the range of effects in this Final EIS we are laying the groundwork for further planning and implementation. At this time there are no specific plans for a broader tolling system, although the idea is certainly under discussion.

The Cost and Tolling Summary Report to the Washington State Legislature can be found online at: http://www.wsdot.wa.gov/Projects/Viaduct/Library.htm.

We understand your point about comparing tolled conditions to either no-action or the "surface+transit" concept. In this Final EIS we have provided further discussion on tolling, its effects, and steps the lead agencies would take to implement tolling without undo disruption.

C-017-008

1) it is not known at this point whether there will be a need to toll the viaduct replacement in order to pay for the viaduct replacement, or if so, how much revenue will have to be raised by tolls, and

2) it is not known whether the Legislature will impose a much broader tolling system by the time any tolls on the viaduct replacement may be imposed.

Bids for the tunnel itself, the portion of the deep bore tunnel that has been considered the highest budget risk, have now come in just under the engineer's estimate. Other portions of the Alaskan Way Viaduct Replacement Project have come in substantially under the engineer's estimate. If WSDOT continues to be able to take advantage of the current favorable bidding climate, it is likely that the amount of revenue that must be raised by tolls will be less than originally assumed or the need for tolls for the viaduct replacement may be even eliminated. It is certainly unlikely that the worst-case tolling scenario that WSDOT studied would be implemented. As the EIS points out, Puget Sound Regional Council's Transportation 2040 recommends moving to a new system of user fees, including a broader tolling system. The state does not have revenue to address many of the transportation needs of the Central Puget Sound Region, and a switch to higher gas mileage or electric cars will cause more and more motorists to avoid paying for roads through the gas tax. It is likely that over the next few years the Legislature will address that problem by imposing a broader system of tolls in the Central Puget Sound Region. Should that happen, the result would be a reduction of traffic diversion from the viaduct replacement to other regional roadways. Without actually knowing what revenues will be required to complete the viaduct replacement, and without knowing what other tolls may be imposed, it is impossible to make any meaningful projections of the impact of tolling on the deep bore tunnel.

It is also important to recognize that even if tolls are imposed on the deep bore tunnel and not on the other major arterials, and even if tolls result in diversion from the deep bore tunnel, the deep bore tunnel would continue to provide substantial through capacity, and indeed for businesses for which time is money needing to move people and goods through downtown Seattle, the lower volumes of traffic using the tunnel would mean that the trip is faster. In that sense it is inaccurate to compare congestion from the deep bore tunnel with tolling to the no action (viaduct closed) alternative or the Surface + Transit alternative, because although the general levels of congestion may become closer with tolling of the bored tunnel, with the bored tunnel, any party seeking to avoid that congestion can do so for the price of the toll. With the no action (viaduct closed) scenario or Surface + Transit, there would be no escape from the congestion.

Again thank you for the opportunity to comment on the DSEIS. We look forward to continuing to work with the Project Team as the project moves into the construction phase.

Sincerely,

GRAHAM & DUNN PC

Elaine L. Spencer

ELS/els
cc: Members of the Seattle Historic Waterfront Association
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