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Seattle Department of Transportation
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December 14, 2010

Dear Ms. Freudenstein and Mr. Hahn:

This letter is to provide comments on the draft EIS for the Alaskan Way Viaduct replacement project. This project will have massive impacts affecting the city of Seattle. Feet First is primarily concerned with the impacts on pedestrians, both in Pioneer Square and at the tunnel portals, as well as the impacts from motorists diverting to avoid the tolls.

Feet First has followed this project closely for many years, having had walks with two different Seattle City Council members (Nick Licata and Sally Bagshaw) on the waterfront, in 2004 and 2010 respectively. Our organization promotes walkable communities, and sees this project as having critical impact on the walkability of a number of Seattle neighborhoods. The DEIS information is complex and the impacts are described in various sections throughout. We have organized our comments by bolded subheads within this document.

Pioneer Square Neighborhood & Historic District – Traffic Impacts

Currently, the viaduct offers seven on and off ramps to provide access to downtown Seattle neighborhoods, spread from the stadium area to Belltown (Ch 4 pg 74). The tunnel alternative reduces the number of downtown ramps to four, and concentrates them all in one location adjacent to the Pioneer Square Historic District. This configuration concentrates all the traffic going between SR-99 and downtown Seattle on only a few streets, most of them in the Historic District.

The Pioneer Square Historic District is already inundated with car traffic during events at Safeco Field, the Stadium Exhibition Center, and Qwest Field for



almost 100 days a year, with a decent percentage of these happening during the week at rush hour. Accommodating additional traffic generated by the southern portal, including at least 50,000 cars a day and possibly 45,000 more due to toll diversion, on event days will be extremely challenging,

Feet First believes additional study is needed to understand how this additional traffic, at least 50,000 cars a day, and possibly 45,000 more with toll diversion, generated by the southern portal, will be accommodated on event days.

After analyzing the traffic impacts on surface streets that would result from tolling, the DEIS concludes that "These effects would not be acceptable as part of a long term tolling solution." (Ch 9, pg 214) No alternative is suggested other than to say another alternative is needed. **This is not acceptable.** The entire purpose of a DEIS process is to examine alternatives, yet in this document we are presented with an alternative deemed unacceptable with no valid options for consideration.

Without tolling, the DEIS says that 29,000 additional cars will shift to City streets from SR-99 (Ch 2 pg 19). Specific to the Pioneer Square neighborhood, the DEIS states that 50,000 cars a day are expected to use the southern portal ramps (Ch 5 pg 104). If tolling is implemented, as required by the funding plan for the project, an additional 40,000 to 45,000 cars are expected to divert to city streets. How many of these diverted cars are expected to use the southern portal, and the City streets to access this portal? The DEIS does not provide specific information on the number of diverted cars expected to use the southern portal ramp or city streets to access this ramp. The DEIS needs to more clearly define these impacts.

Traffic impacts to Pioneer Square Historic District streets are unacceptable. The existing street grid in this area is not well connected, and there are not many viable routes. Some of the streets are narrow, historic, physically fragile, pedestrian oriented and not suitable for use as access roads to a highway interchange. With the planned First Hill streetcar extending into the neighborhood in some scenarios, additional burden will be placed on these narrow streets. Feet First has already identified significant concerns about the area around the portals in previous correspondence.

This DEIS **must** describe in more detail the traffic volumes that are expected on specific streets around the southern portal. Feet First has five specific requests for additional data:

- 1) How many cars will use Alaskan Way, First Ave, Second Ave, Fourth Ave? This DEIS must identify street revisions to make room for all these cars, and describe in detail the impacts of these solutions.
- 2) How will the planned revisions affect the pedestrian character of the streets? Will WSDOT remove on-street parking, or any of the mature and cherished London Plane trees in the Historic District? The DEIS needs to include more details on pedestrian impacts in Pioneer Square.
- 3) Will these changes affect the access to and viability of retail? The DEIS does not mention this, and given the fragile nature of the Historic District Feet First believes more study is warranted.
- 4) Are these historic streets, built on fill and supported by 100 year old areaways and retaining walls, physically capable of carrying this much traffic? Again, the DEIS does not provide sufficient data to indicate enough work has been done on impacts in Pioneer Square.
- 5) If the impacts to transit are unacceptable, what alternative solution or mitigation is being offered? While we talk more about transit in particular later in this letter, it is important to point out again the DEIS provides no mitigation for the transit impacts of the project. Pedestrians need good transit, and Feet First believes this DEIS must contain better transit options.

How many of these toll diversion trips will use the new Alaskan Way surface street on the waterfront? How would this impact the waterfront parks and public spaces being planned now? The Mercer Street project includes significant changes to Valley, the street running closest to the south end of Lake Union, to narrow and calm the street and make it a safer environment for pedestrians and cyclists. A significant number of toll diversion trips on Alaskan Way will increase the pressure to widen this street and ‘take advantage’ of the right-of-way created with the Viaduct’s removal. This would have significant impact on the viability of the Alaskan Way/waterfront public spaces and their walkability.

To avoid burdening Historic District streets with an influx of traffic generated by the southern portal, additional alternatives and mitigation must be considered, such as additional transit, or routing traffic away from the Historic District, or demand management. These ideas should be evaluated to determine the impacts of these possible solutions. A mitigation plan must be developed to show how WSDOT will prevent, resolve, or mitigate the intolerable detriments to the functioning of Seattle's local transportation system.

Pioneer Square Neighborhood and Historic District – Areaways/historic walking tour

Boring a tunnel next to Seattle's historic Pioneer Square neighborhood, with its historic buildings, fragile and brittle infrastructure, high water table, and unstable soils, is a steep engineering challenge. This DEIS describes the risks of digging and boring in this location (Ch 5 pg 126), possible damage to 12 historic structures (Ch 2 pg 31), and possible collapse or dramatic damage to two buildings (Ch 6 pg 142) during construction, and mentions measures to protect structures.

The DEIS says this of the Western and Polson buildings, both ‘contributing’ buildings in the Pioneer Square Historic District: “Mitigation measures to protect the buildings may not prevent the need for demolition to avoid the possibility of collapse.”

The DEIS says twelve buildings within the Pioneer Square Historic District or listed on the National Register of Historic Places – including the Historic Federal Building -- may be affected by settlement, structures could crack, and utilities may be disrupted or damaged. While the DEIS states measures will be implemented to avoid or minimize damage, it mentions that unavoidable damage might still occur with the preferred alternative. Feet First has specific requests for additional data:

1. What damage could soil settlement from tunnel boring cause, specifically?
2. What is the likelihood of unavoidable damage? Will residents and users of those buildings be at risk of harm?
3. Will Pioneer Square's unique but delicate areaways and historic underground level be at risk?
4. What buildings specifically will be required to have their supporting soil improved with jet grout?
5. What impacts will that have on the use of their underground portions?
What sidewalks will be closed, what streets will be closed, what basements will be altered, what areaways will be temporarily or permanently affected?
6. Specifically, what impact will this have on the famous Underground walking tour, a Seattle tradition and tourist favorite?

Some of the 'solutions' proposed in the DEIS actually exacerbate other problems. Given that water table is quite close to the surface, there is risk that the solidification of soils -- due to tunnel walls, retained cuts at the portals, and the injection of jet grout under buildings -- might alter natural water flows, create a water barrier, and cause water to back up in the Pioneer Square Historic District. (Ch 5 pg 127). Feet First asks that the DEIS

include a full evaluation of the impacts of working within these conditions, provide more information on the potential impacts that could significantly harm the Pioneer Square neighborhood, and pay particular attention to impacts on pedestrians moving through the area.

Pedestrian Treatments - North and South Portals

The areas around both the North and South Portals are located in vibrant urban neighborhoods that generate large volumes of pedestrians. Traffic volumes will likely significantly increase on the main roads accessing both portals, such as South Royal Brougham Way, South Dearborn Street, South King Street, South Atlantic Street, South Charles Street, Aurora Avenue North, Sixth Avenue North, and Dexter Avenue North. Street design at key pedestrian crossing locations should incorporate enhanced pedestrian crossing design elements. This would include refuge islands, enhanced pavement markings, and tight turn radii.

Transit – The Pedestrian’s Friend and Forgotten Partner

After analyzing tolling impacts on transit riders (Ch 9, pg 215) the DEIS concludes again that "These effects would not be acceptable as part of a long term tolling solution." As the preferred alternative is described, the negative impacts to local traffic are egregious. When the diversion effects of tolling are included, these impacts worsen. Transit must be part of the solution.

Many of our members and supporters use transit to extend their pedestrian trips, and we have long been aware of the important relationship between pedestrians and transit. When the bored tunnel as preferred alternative was announced in January 2009, the package included \$190 million worth of transit investments and \$15 million worth of transit service. Additional transit service was then, and is now, essential for providing access to and from downtown Seattle, since the bored tunnel does not provide sufficient access by itself. Additional transit service should be included in this analysis and analyzed for its utility and effect on traffic on streets and in the bored tunnel.

Given WSDOT’s insistence the City of Seattle is responsible for ramps, surface street projects, and mitigation related to the tunnel, it is clear there will be minimal funding for the necessary transit projects required by the tunnel. It is our further belief that WSDOT’s position on this issue is incorrect, and that projects related to getting vehicles to and from the tunnel should be funded by the State, not the City. Transit is already in a very difficult fiscal condition, with both King County Metro and Sound Transit suffering significant loss of revenue from declining sales tax receipts.

Sustainability

The preferred alternative directly violates several city and state policies regarding emissions reduction, vehicle miles traveled reduction, multi-modal transportation, complete streets, and carbon neutrality. It may seriously hamper access between urban neighborhoods for pedestrians, bikes, and transit users by flooding local streets with private vehicles, and increasing emissions. The following plans and goals adopted by the City of Seattle goals are in direct conflict with the project, which include:

- City policy from Climate Action Plan
- City policy from Comprehensive Plan
- City goals for Carbon Neutral Seattle

The City and State both have policies urging transportation agencies to pursue decreased Vehicle Miles Traveled over time, and increase the viability of other modes, as part of a larger effort to reduce green house gas emissions from vehicles. State law says we shall “By 2035, reduce overall emissions of greenhouse gases in the state to twenty-five percent below 1990 levels.”
(<http://apps.leg.wa.gov/rcw/default.aspx?cite=70.235.020>)

The assumptions in this EIS portraying an increased need for and usage of car capacity are counter to City and State policy. These assumptions are also counter to evidence that car travel in this corridor has been flat for 12 years. This DEIS should aim for and explain how this project could help reduce the need for car usage in compliance with the state’s VMT reduction targets. This analysis should also include pedestrian, bicycle, and transit modes.

The **statement of purpose and need** (Ch 1 pg 4) should continue to use the long- established definition for this project, ‘mobility for people and freight’, and not redefine the target as vehicle ‘capacity.’ In the 2006 SDEIS the purpose was to “...maintain or improve mobility, accessibility, and traffic safety for people and goods along the existing Alaskan Way Viaduct Corridor.” This statement of purpose and need allowed for sustainable solutions --such as transit, demand management, or use of available capacity on existing facilities-- to be considered. Use of the term capacity instead of mobility precludes possible cost-effective solutions and counters city and state transportation policy.

In light of the EPA’s recent decision to regulate **greenhouse gases as pollutants**, the DEIS should compare the greenhouse gas emissions for all the alternatives. The analysis should examine the construction emissions and cumulative use impacts of the solution - not just the trips on the facility, but the area-wide effects generated by the decision in this corridor.

An additional report is required that analyzes in detail how different alternatives could better meet the intentions and specific directions of these policies discussed above.

Appropriate Review of Reasonable Alternatives

It is clear from Feet First’s review of the DEIS that the tunnel alternative is an expensive project with many unresolved challenges, and significant risk to the City of Seattle. The preferred alternative does not solve the full challenge of viaduct replacement, and is clearly incomplete without solutions that enhance local mobility.

The alternatives do not effectively replace access into Seattle without putting the Pioneer Square Historic District at risk. This DEIS should compare current and reasonable alternatives to the tunnel, in case its merits do not outweigh the costs and risks.

The DEIS should address the need for good access into downtown Seattle neighborhoods, and study how to best provide this access for people and freight. The DEIS should also analyze additional transit service, demand management programs, street improvements that route local trips to other arterials, and I-5 improvements to shed light on how best to improve access to Seattle neighborhoods.

At the conclusion of the 2008 stakeholder process, the leaders of the City, County and State Departments of Transportation recommended two alternatives for viaduct replacement: the I-5/ Surface / Transit hybrid, and the Elevated / Transit hybrid. After a year-long evaluation, these two approaches proved best for meeting the

agencies' six goals for viaduct replacement. **These two solutions are reasonable, current, and should be evaluated in this DEIS.**

City of Seattle Ordinance 12246 states the City's preference for an alternative: "In the event a tunnel proves to be infeasible, the City recommends the development of a transit and surface street alternative that meets the intent of Resolutions 30664 and 30724." This alternative would offer the City one of the key advantages it seeks – reclaiming the downtown waterfront – at a significant cost savings.

Summary

This DEIS reveals that the merits of the preferred alternative are fewer than expected, and the harms and risks higher. The bored tunnel alternative, as described in this DEIS, only solves a portion of the challenge.

Specifically:

1. As the preferred alternative is described, the negative impact on local traffic is significant. When the diversion effects of tolling are included, the negative impact appears intolerable. A mitigation plan must be developed to show how WSDOT will prevent, resolve, or mitigate the intolerable impacts on the streets of the Pioneer Square Historic District. Additional transit, a robust traffic management plan to shift traffic away from Historic District streets, transportation demand management, improvements to I-5 - even relocating the interchange or two of the ramps elsewhere - should be analyzed for their ability to protect Historic District streets.
2. When the bored tunnel as preferred alternative was announced in January 2009, the deal included \$190 million worth of transit investments and \$15 million worth of transit service. Additional transit service was then, and is now, crucial in providing access to and from downtown Seattle, since the bored tunnel does not provide sufficient access by itself. Transit service should be included and funded as part of the project, Pedestrians need transit as a trip extension tool, and benefit greatly from transit service.
3. A mitigation plan must be developed to show how WSDOT will prevent, resolve, or mitigate the risks to historic buildings along the tunnel route, and specifically to the Pioneer Square Historic District.
4. A full budget for the above mitigation plans should be developed that identifies the appropriate source for responsibility. This is a state project, and the state must show it can cover costs for:
 - the bored tunnel itself,
 - other project components promised as part of the program (lids over the cut and cover sections, improvements to the street grid around the portals, pedestrian, bike and transit improvements, urban design and landscaping around the portals, etc),
 - protection of or mitigation for local streets and historic resources, and
 - any cost escalations that may occur due to the project risks.

Because of the state's firm cost cap at \$2.4 billion, the lack of clarity around what costs are covered in the two bids, and the continuing contention around the liability for cost overruns, and the \$700 million of project funding still not secured, decision makers at the City and State deserve a clear picture of total project costs compared to secure funding. The City of Seattle, local neighborhoods, or local property owners cannot be held liable for costs of the State's project.

With this project, it is the State's responsibility to protect the pedestrian environment, streets, and physical fabric of the Historic District, including the underground and areaways. The Pioneer Square neighborhood is counting on City elected officials to negotiate with WSDOT on solutions to ensure highway-bound traffic is not routed through Historic District streets and excellent design components for local streets that are altered due to this project and to secure adequate funding for successful completion of this project. All of Seattle is counting on City and State decision makers to ensure that the historic buildings and underground are safe from damage, and Pioneer Square residents and visitors are safe from risks.

As decision makers weigh the alternatives, it is imperative that the answer not only serve automobile bypass trips going through Seattle, but also enhance access into downtown Seattle neighborhoods, support Seattle's policies supporting walking, biking, and transit modes, and ensure the opportunity of the new waterfront is protected and not inundated with excess traffic.

Feet First appreciates the opportunity to provide comments on the DEIS. We expect Washington Department of Transportation will consider these comments carefully, and take swift action to more clearly define the impacts and effects of this project. Should you have questions, feel free to contact me directly by calling 206-652-2310 or emailing lisa@feetfirst.info

Sincerely yours,

A handwritten signature in black ink, appearing to read "Lisa Quinn". The signature is fluid and cursive, with the first name "Lisa" and last name "Quinn" clearly distinguishable.

Lisa Quinn
Executive Director

cc:

Richard Conlin, Seattle City Council President
Tom Rasmussen, Seattle City Council Transportation Chair
Sally Bagshaw, Seattle City Council
Tim Burgess, Seattle City Council
Sally Clark, Seattle City Council
Jean Godden, Seattle City Council
Bruce Harrell, Seattle City Council
Nick Licata, Seattle City Council
Mike O'Brien, Seattle City Council