June 1, 2004

Alison Ray  
AWV Project Office (Wells Fargo Building) 
999 Third Avenue, Suite 2424 
Seattle, WA 98104  

Dear Ms. Ray:

The Seattle Planning Commission and the Seattle Design Commission appreciate the opportunity to share the results of their combined review and comments on the SR 99: Alaskan Way Viaduct & Seawall Replacement Project Draft Environmental Impact Statement (DEIS).

Many of our comments are grounded in the project principles we developed in October, 2001 and shared with both City and State officials (see attached). We believe that the DEIS is an important opportunity to inform the project team about matters of utmost importance to the two Commissions as this project moves forward, as well as comment more specifically on the adequacy and content of the DEIS document.

The Commissions recognize the important role of the EIS process. It describes in detail the alternative options and identifies all potential impacts; identifies the best possible ways to mitigate these impacts; and gives the public the opportunity to weigh in on the document. It is likely to be the most important tool used to identify the preferred alternative which will be selected later this summer. The Final EIS is also critical as it will become the blueprint for Washington State Department of Transportation, the City, and the community as the project moves into design and implementation for identifying and determining impact mitigation. This document should also confirm the State’s and City’s commitment to consistency with all relevant City policies.

We believe the EIS process should describe how decisions will be made about this significant project. Since this is not included in the DEIS, the City and State should clearly articulate this process during the next month as it meets with the Leadership Group and other agencies.

**Most fundamentally, we hold the Viaduct to be a transportation project that is and should be a driver for urban and community development.** This is truly an example of the inextricable relationship between transportation and land use in shaping an area. Therefore, the decision-making process should be transparent to all stakeholders.
Nine Planning Commissioners and four Design Commissioners have participated in reviewing specific sections of the DEIS. Commissioners, who represent a broad spectrum of professional disciplines and most geographic areas of the city, have reviewed the DEIS from their diverse perspectives. The Planning Commission reviewed this document keeping in mind their role as a primary steward of the City’s Comprehensive Plan and its Neighborhood Plans. The Design Commission’s review reflects its primary responsibility for reviewing aesthetic, environmental and design aspects of City capital improvement projects and projects in the City right-of-way.

Based on this analysis of the DEIS and additional project reviews, each of the two Commissions will also identify key issues that are important for the City to consider in the selection of a preferred alternative this summer. To that end, we would strongly recommend the creation of a consolidated scorecard by which decision makers could compare and assess the alternatives based on the most critical aspects, including: transportation benefits, economic benefits, quality of urban environment, and costs.

Below you will find a summary of our comments and overall recommendations, while a more detailed, DEIS Comments Matrix is attached.

**Overall Recommendations:**

- **Alternatives** –
  The five alternatives and many variations present a complex range of potential solutions, but still miss some reasonable alternatives. While the effort to bracket the broadest range of options possible is admirable, we encourage more study of some lower cost and more common sense solutions, including a reduced traffic capacity option (see the detailed comments on this option). The overall analysis should assess which option best addresses the emergency or default plans if a seismic event were to occur sooner rather than later.

- **Land Use/Economics** –
  The Final EIS should look more in-depth at the economic value inherent in the future use of land that is made available by various alternatives since this will vary widely among the options. The loss of surface parking is a key issue that requires more focused study. The impact on the City and to waterfront businesses, in particular, promises to be profound and should be addressed for all alternatives.

- **Construction** –
  The Commissions have serious concerns about the scale of construction activities with all of the options and the protracted phasing schedule outlined in the DEIS. We urge you to look at more expeditious strategies, and believe the schedule need not be so sequential. We recommend that the project commit to implementing surface improvements early on and identify a point in the project to step back and study how traffic redistribution is working, adjusting future phases accordingly.
• Transportation –
  The Final EIS should look at the project in its larger context, considering the need for regional transportation network solutions and for a commitment to not impact other parts of the network.

• Visual Quality –
  Develop the potential to improve the coherence and connections into the City and views from the City. Strive to repair the gaps in the fabric of downtown.

Again, we appreciate the chance to provide our comments on this project DEIS, recognizing the magnitude of its importance to the community and region. We would be happy to meet with both City of Seattle and Washington State Department of Transportation staff to answer any questions you have or to discuss our comments further.

Sincerely,

David Spiker, Chair
Seattle Design Commission

George Blomberg, Chair
Seattle Planning Commission

Attachments:
  1. SPC / SDC Recommended Principles on the Alaskan Way Viaduct and Seawall Abbreviated Version
  2. Section by Section Comment Matrix

cc: Secretary Doug McDonald, WSDOT
    Mayor Greg Nickels
    Seattle City Council
    Maureen Sullivan, WSDOT
    Tom Madden, WSDOT
    Grace Crunician, SDOT
    Bob Chandler, SDOT
    Steve Pearce, SDOT
    Diane Sugimura, DPD
    John Rahaim, DPD