



To: Mark Mazzola, City of Seattle Office of the Waterfront
From: Transportation Choices Coalition, Feet First, Washington Bikes and Cascade Bicycle Club
Re: Alaskan Way, Promenade, and Overlook Walk DEIS
Date: August 26, 2015

Dear Mr. Mazzola:

Thank you for the opportunity to comment on the Alaskan Way, Promenade, and Overlook Walk Draft Environmental Impact Statement. The City of Seattle's plan to rebuild the waterfront will help shape the city into a more sustainable, vibrant, and connected one. Transportation Choices Coalition advocates for more and better transportation options in Washington State, Feet First is working to ensure all communities across Washington are walkable, Cascade Bicycle Club aims to connect the region's cities with protected bike lanes, neighborhood greenways and trails, and Washington Bikes works to make bicycling better in the #1 Bicycle Friendly State in America. With the expansion of the waterfront, we believe that the City has the opportunity to create a connective network of efficient, multimodal transit; prioritize non-motorized traveler safety; and promote the use of accessible open space. Using these guiding principles, our organizations offer the following comments:

We strongly support the creation of new public space and easy nonmotorized access between downtown and the waterfront through the Overlook Walk and Promenade components of the project.

- **Overlook Walk and east-west connections**

The Overlook Walk and the other east-west connections are both essential for achieving the goal for new open space and improved pedestrian access. The Overlook Walk as designed greatly expands the pedestrian realm, including those who require ADA access. The Overlook Walk adds well-designed, promising open space to Seattle's busiest district, space that is desperately needed by visitors to the Pike Place Market. These projects are essential and should be a top priority for the project.

- **The Promenade**

The expansive and well-designed promenade offers multiple opportunities to engage and experience the water, creating a tremendous improvement to the pedestrian environment. Please don't reduce the number of trees, and consider adding more if possible; they are important for expanding canopy, and an essential part of the charm.

- **We support the design and the connection of the new structure of MarketFront at Pike Street.**

This is the preferred location for this connection as it will provide important pedestrian access to Pike Place Market and the Seattle Aquarium.

Parking space loss can be more effectively managed by improving multimodal and transit access, rather than directly constructing, purchasing, or leasing more parking spaces.

- **Prioritize parking demand management over building more parking spaces.** According to the DEIS, AWPOW would eliminate a net total of 673 on and off-street parking spaces in the study area. However, approximately 250 of those spaces would be accommodated for as a part of the Pike Place Market Waterfront Entrance project (PPMWE), resulting in a net loss of

approximately 423 parking spaces.¹ Although constructing parking spaces as a part of the PPMWE might provide direct benefits, improved public transit and parking management techniques can serve to better alleviate the loss of parking in the downtown area. The implementation of high frequency, reliable shuttle buses or an increase of Pronto Cycle Share stations along the waterfront could be a more cost-effective approach in comparison to the acquisition of private estates to construct surface parking lots.² The City should prioritize parking management techniques whenever possible, such as those listed in the DEIS. Modifying on-street parking policies, enforcing limits to make the most efficient use of the supply of short-term parking, shared parking, and increased awareness have shown to be more efficient and less expensive methods to mitigate parking space loss.³

The City should consider using a multimodal approach for Level of Service (LOS) standards.

- **Using auto-centric LOS is inconsistent with the City’s GHG emissions reduction targets.** The DEIS’ primary metric for evaluating the transportation impacts of different alternatives is LOS, which measures the number of vehicles crossing a number of screenlines across the city compared to the designated capacity of the roadways crossing the screenline. However, LOS has been shown to make it more challenging to approve environmentally-friendly projects (such as adding bike facilities or widening sidewalks) that reduce road capacity or to encourage dense development in urban areas.⁴ Multimodal LOS standards should instead be set to prioritize the movement of people and goods instead of only the movement of vehicles, and should encourage development that can be supported by walking, bicycling, and transit use.⁵
- **Seattle has the flexibility to set multimodal LOS standards.** While the Growth Management Act requires level-of-service standards for arterials and transit routes, it does not prescribe what these standards should be. According to PSRC, local governments have “virtually limitless discretion” when setting LOS standards.⁶
- **Other cities and jurisdictions have moved toward alternatives for measuring LOS.** In 2014, the State of California published draft guidelines proposing to substitute Vehicle Miles Traveled (VMT) for LOS.⁷ Jacksonville, Florida has developed a Multi-Modal Transportation Plan, which uses pedestrian and bicycling LOS ratings to prioritize walking and bicycling improvements.⁸ Nearby Bellingham, WA, has created innovative new LOS methods specifically designed to help achieve the infill and multi-modal goals and policies of the city's comprehensive plan.⁹

¹ http://waterfrontseattledeis.publicmeeting.info/Media/Default/Documents/AWPOW_DraftEIS_June2015.pdf

² <http://www.vtpi.org/tdm/tdm39.htm>

³ http://www.vtpi.org/tdm/tdm28.htm#_Toc128220497

⁴ <http://la.streetsblog.org/2014/08/07/california-has-officially-ditched-car-centric-level-of-service/>

⁵ <http://www.psrc.org/assets/11694/MMLOS.pdf>

⁶ <http://www.psrc.org/assets/11694/MMLOS.pdf>

⁷ <http://la.streetsblog.org/2014/08/07/california-has-officially-ditched-car-centric-level-of-service/>

⁸ <http://www.planetizen.com/node/46112>

⁹ <http://mrsc.org/Corporate/media/MediaLibrary/SampleDocuments/ArtDocMisc/B45BeyAuto.pdf>

The City should clarify the design of the Colman Dock Multimodal Transit Hub.

- **The design of Colman Dock is critical to making it a safe and accessible multimodal transit hub.** According to the DEIS, “New bus stops on Alaskan Way and Columbia Street and a multimodal hub at Colman Dock would also be included as part of AWPOW, and would improve the experience of transit users in the study area.” It is unclear how the implementation of bus stops and the transit hub would improve the experience of transit users. The City should clarify the specific locations and routes of buses along the main corridor that impact the Colman Dock Multimodal Transit Hub. The DEIS provides limited information on which streets are being heavily used by busses and the location of new bus stops in relation to Colman Dock. This directly impacts the safety of pedestrians crossing eight lanes of traffic to connect to the transit hub. The effectiveness and accessibility of the transit hub is dependent on these critical connections and the safety of non-motorized and transit users should be prioritized.

In designing and constructing the Alaskan Way corridor, the City should prioritize convenient and safe non-motorized connections along and between the waterfront and Downtown Seattle.

- **Ensure safe and consistent routes for bicyclists and pedestrians during construction phases.** The City will develop a Traffic Control Plan to protect pedestrian and bicycle traffic during all phases of construction. The plan should be developed in accordance with City construction specifications and should consider the unique needs of bicyclists during each construction phase. Disruptions to existing bicycle facilities by removing the facility should be minimized. Rerouting should minimize substantially longer or more inconvenient paths. Reroutes should include those that minimize the risk of bicyclists having to dodge trucks and other large construction equipment. Special attention should be given to avoid collisions with vehicles exiting driveways and curb cuts along bicycle reroutes and crossing delays at major intersections.
- **Set a design speed of 20 mph.** At 30 mph, five in ten people struck by a vehicle while walking will be killed, while at 20 mph, nine in ten people will survive. Through its Vision Zero initiative, Seattle has set a goal of reaching zero traffic fatalities and serious injuries by 2030, and it is imperative that such a big project as the Waterfront be designed to reach this goal.
- **Increasing the number of lanes on the Alaskan Way corridor could prove to be detrimental for people walking and biking attempting to access the waterfront.** According to the DEIS, pedestrians crossing Alaskan Way near the ferry terminal would have to move across four general purpose, two transit, and two turn lanes for a total of up to eight lanes. A higher number of lanes creates a larger distance for pedestrians and cyclists to travel, ultimately dividing the waterfront from the city. One of SDOT’s core principles for transportation is to improve safety for all people, regardless of what mode of transportation they choose.¹⁰ More importantly, one of the key objectives of the AWPOW project is to reconnect the city to its waterfront. However, the design of Alaskan Way could potentially compromise these principles by discouraging people walking and biking, or putting them at risk when crossing at an

¹⁰ <http://www.seattle.gov/transportation/sdotmission.htm>

intersection. The City should consider strategies to reduce the number of lanes on Alaskan Way and prioritize for people walking and biking safety, including:

- **Consider having one general purpose lane and one mixed transit and freight-only lane in each direction, instead of two general purpose lanes and one transit-only lane.** This configuration could reduce the roadway width by two lanes, without compromising freight reliability, and continuing to offer transit a lane that would not be subjected to peak congestion.
- **Re-evaluate the need for on-street ferry queuing lanes.** Given that many ferries leaving Seattle are at capacity during peak runs, additional queuing capacity would increase demand that could not be met. In order to better manage current demand, WSDOT should consider expanding the ferry reservation system to reduce the need for queueing lanes. Several cities in Washington State have implemented a ferry reservation system intended to reduce lines and wait times, and users have been overwhelmingly satisfied with the changes.¹¹ The implementation of such a system at Colman dock could reduce the need for at least one on-street queuing lane that significantly widens the roadway imprint.
- **Streets, crosswalks and intersections should be constructed to increase pedestrian and cyclist safety.**
 - The National Association of City Transportation Officials (NACTO) recommends crosswalk delays of no longer than 40 seconds (above which pedestrian risk-taking behavior increases).
 - Pedestrian safety islands should be between 8 and 10 feet wide and 40 feet long. The intersections themselves should be raised, or “tabletop” intersections with detectable warnings for vision impaired users, that obviate the need for curb ramps, reduce vehicle speeding, and bring driver attention to crossing areas.
 - Traffic lanes should be no wider than 10’ for general purpose traffic and 11’ for bus or freight in order to reduce the space pedestrians must cross.
 - The expected high volume of bicyclists leaving Alaskan Way and crossing into the heart of downtown will require substantial queuing space while waiting for signals. Adequate crossing space should be considered especially at Seneca and Spring Streets.
- **Induced demand has the potential to negate all benefits of additional roadway capacity.** In 2009, two economists—Matthew Turner of the University of Toronto and Gilles Duranton of the University of Pennsylvania found that “new roads will create new drivers, resulting in the intensity of traffic staying the same.”¹² Increasing the supply of roadway capacity may not necessarily accommodate the entirety of predicted increased travel demand in 2030. Although initial analysis in the DEIS projects less congestion on the newly designed Alaskan Way corridor, research suggests that expanding the number lanes on Alaskan Way could inherently stimulate travel demand, resulting in the same amount of congestion. Instead, the City may want to re-

¹¹ http://www.wstc.wa.gov/StudiesSurveys/FROGSurvey/documents/2015_WSFSpringReservationSurveyRpt.pdf

¹² <http://www.wired.com/2014/06/wuwt-traffic-induced-demand/>

evaluate transportation impacts with multimodal LOS standards and fund programs intended to redistribute demand to maximize the potential of service on roads throughout the day.

The City should consider the suggestions made by King County Metro to expand transit service along the Alaskan Way corridor.

- **Expand the length of dedicated transit lanes along Alaskan Way.** According to the DEIS, the main corridor will include a dedicated transit lane that runs each direction along Alaskan Way between S. King Street and Columbia Street and on Columbia Street between Alaskan Way and First Avenue. However, King County Metro suggests constructing two-way transit-only lanes on Alaskan Way all the way from **Dearborn Street** to Columbia Street, and from Alaskan Way up to **Third Avenue**¹³, several additional blocks than proposed by the city. Because transit along the waterfront is critical to managing travel demand, the City should consider extending transit-only lanes to support King County Metro's suggestions.

Additional Comments:

- **We support the construction of wide sidewalks and accessible open spaces.** We support utilizing street furniture and trees not only on sidewalks adjacent to the waterfront in order to create comfortable, spaces that encourage the activation along the entire corridor.
- **We support consistent wayfinding and proper pedestrian scaled lighting.** Kiosks or street blades at pedestrian scale, along with appropriate lighting, should connect the waterfront with neighborhoods along First Avenue including Belltown, Westside, and Pioneer Square. Clear signs and designations that accommodate a variety of users are necessary.
- **Improve bike access to Colman Dock.** Bainbridge Island residents have one of the highest bike commute mode shares in the region. The ferries have limited capacity to handle more vehicles, but can easily handle more people on bikes. As the Waterfront and Colman Dock are rebuilt, a north and south entrance to the dock and a well-lit waiting shelter should be constructed for people biking onto the ferries. WSDOT and Washington State Ferries should continue to support previously discussed recommendations from bike advocates Squeaky Wheels, Washington Bikes and Cascade Bicycle Club on the new Colman Dock design, including re-opening the north gate and creating a larger, more efficient, safer and more pleasant holding area along the new north rail.
- **Ensure that protected bike lanes are included in the AWPOW project, are designed to maximize safety, and make connections with current Center City Bike Network planning.**
 - We support 14'-wide protected bike lanes.
 - Keep protected bike lanes on near-side to street, separated from roadway by a planter barrier.
 - Planned protected bike lanes and other bike facilities should match up cleanly with AWPOW bike facilities.
 - Several projects recommended in the Bike Master Plan are in the vicinity of the study area. These include protected bike lanes on Alaskan Way and on Seneca and Spring

¹³ <http://your.kingcounty.gov/kcdot/transit/SETP/SEndTransitPathwaysInfo.pdf>

Streets between First Hill and the waterfront. Off-street bicycle facilities are recommended between S. Jackson Street and S. Royal Brougham Way on Alaskan Way.

- The Bike Master Plan also proposes that a neighborhood greenway be provided on S. Washington Street between Alaskan Way and Fifth Avenue S.
- Extend protected bike lanes to the Myrtle Edwards Park Trail as a vehicle trip mitigation strategy, thus connecting the bike network and encouraging more people to arrive to the waterfront by bike.
- **The AWPOW EIS should better consider bicycle parking, not just vehicular parking.**
 - The AWPOW DEIS heavily analyzes vehicular parking, but there is next to no attention to demand for bicycle parking.
 - The AWPOW will substantially increase bicycle volumes in the project area. We would like to see an accounting of bicycle parking along the corridor impacted and removed during construction phases.
 - In terms of final build out, we would like to see an accounting of new bicycle parking that will be added in the project area. The only mention of bicycle parking in the DEIS is in relation to the new gathering areas at Colman Dock. Bicycle parking in this location will not be sufficient to meet demand along the corridor.

Sincerely,



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