**From:** Ciara Stewart
**To:** AWV SDEIS Comments;
**CC:**
**Subject:** Sustainable Solution for the Seattle Viaduct
**Date:** Thursday, September 21, 2006 12:52:18 PM
**Attachments:**

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Dear Ms. Stenberg,

**I-661-001** Neither the tunnel plan nor the elevated plan is affordable, and neither is an environmentally friendly choice. I urge you to develop a range of lower cost alternatives for viaduct replacement. Include the Transit + Streets approach, where all the available capacity in the transportation network is considered and employed to provide mobility in this corridor. This alternative will save us money, provide increased mobility for everyone in the area, not just a single corridor, improve transit service, help meet greenhouse gas reduction goals, and provide a true waterfront for all.

**I-661-002** Please read the following report by the Congress for New Urbanism about the project:

**Expert report: Removing Seattle viaduct is viable**
September 12, 2006

**Report Finds Flaws in Alaskan Way Viaduct Traffic Analysis Used by WSDOT**

Engineers conclude that adequate street capacity makes not rebuilding the viaduct a "viable option" and call for analysis to be corrected for Seattle to make an informed decision on its Alaskan Way options

Traffic experts who have conducted a thorough review of the Washington State Department of Transportation's analysis of the "no-replacement option" for the damaged Alaskan Way Viaduct have found significant flaws in that analysis, including the use of exaggerated estimates of future downtown street traffic and misleading conclusions about the amount of truck traffic on the viaduct.

The review by engineers Norman Marshall and Lucinda Gibson, PE of Smart Mobility reveals that WSDOT has used this flawed analysis to support its position that the viaduct should be rebuilt as an elevated structure and that a "no-replacement" alternative should be ruled out. Read the full report.

A review of data prepared for WSDOT shows that removal of the viaduct would cause traffic to redistribute in a variety of ways, say Marshall and Gibson, as drivers choose

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Many people asked the lead agencies to consider an alternative that would remove the viaduct and replace it with a four-lane surface roadway along Alaskan Way and include transit improvements. Without a host of improvements and modifications, a four-lane Alaskan Way would create even more congestion on I-5 and downtown streets than the alternatives evaluated in the Draft and Supplemental Draft EISs. Transportation studies performed for this project indicate that replacing the viaduct with a four-lane surface street would substantially increase congestion for most of the day and part of the evening on I-5 through downtown Seattle, downtown streets, and Alaskan Way. On downtown streets, traffic would increase by 30 percent; though traffic increases to specific areas like Pioneer Square and the waterfront could exceed 30 percent. With a four-lane roadway, traffic on Alaskan Way would quadruple to 35,000 to 56,000 vehicles per day compared to about 10,000 vehicles today. This traffic increase would make Alaskan Way the busiest street downtown, carrying more traffic than Mercer Street does today. The increased traffic congestion would also make travel times worse for buses, making transit improvements along these streets largely ineffective. Finally, neighborhoods west of I-5 (Ballard, Queen Anne, Magnolia, and West Seattle) would be less accessible and would face longer commute times.

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Thank you for sharing this article. The lead agencies have conducted a thorough analysis of alternatives as described in Chapter 2 of the Final EIS. Please refer to Appendix C, Transportation Discipline Report, in the Final EIS for updated information regarding traffic analysis in the corridor.

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different routes and destinations. The engineers conclude that downtown street network has additional capacity and that the impact of a no-replacement option on these streets "is likely to be manageable." In fact, WSDOT is already working on this challenge as it plans to manage traffic during Alaskan Way project construction, note the authors.

While Marshall and Gibson call the "no-replacement" alternative studied by WSDOT a "coarse" version of the option to replace the viaduct with improved streets and transit service, they say that existing data show even the coarse option to be viable.

The report has some strongly worded findings about WSDOT's misuse of data to create myths that have distorted the debate over what to do with the Alaskan Way viaduct. "In the debate on the Alaskan Way Viaduct, WSDOT has done the public a disservice by stressing in their communications simplistic and wrong-headed myths about the transportation system," write Marshall and Gibson. "The picture they put forward is that more than 100,000 vehicles use the AWV to pass through the downtown, that a large portion of these vehicles are trucks essential to the region's economy, and that without replacement, these vehicles would all divert onto downtown streets and cause catastrophic congestion. In fact, WSDOT's own data show that most current peak period AWV traffic is not through traffic, that few of the vehicles are trucks, and that most of the trucks are also accessing downtown. WSDOT has not bothered to seriously analyze downtown street capacity."

Marshall and Gibson take special exception to the traffic projections in WSDOT's environmental impact statement for the no-replacement alternative. Although the Puget Sound Regional Council transportation model shows "little or no growth" in traffic on SR 99 ramps and local streets in 2030 because of growth in transit use, WSDOT chose to adjust the traffic estimates in these models upwards by 5 to 30 percent when considering the AWV options. The authors say WSDOT holds up its computer models like "the Wizard of Oz, saying the model says this, and we must accept it." But in truth, WSDOT has adjusted the models with inflated traffic to fit their "mental models."

WSDOT calls this practice "conservative," but the authors note "this suggests that only the risk of building too little capacity is considered, and not the risk of purchasing too much capacity at an extravagant cost."

CNU President John Norquist said the phenomenal cost of both rebuilding the elevated freeway and replacing it with a tunnel means the people of Seattle deserve to have the best information possible on a surface-streets-and-transit option that may prove very beneficial. "This transportation review shows that the experience of San Francisco, Portland, and Milwaukee deserves serious consideration in Seattle. Given how traffic has redistributed and how neighborhoods have come back to life, it's hard to find anyone in these cities who would consider rebuilding the elevated freeway or digging a big tunnel."

In order for Seattle to make an informed choice, WSDOT needs to correct a number of

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flaws in its no-replacement proposal, says the report. The revised model should:
• Use accurate downtown traffic volume projections instead of inflated volumes,
• Provide a detailed surface Alaskan Way with desirable urban speed (30 m.p.h.) and design features,
• include an improved distribution system to the north and south so that SR-99 traffic can smoothly reach parallel streets,
• include the increases in transit service that Seattle will soon be experiencing, and
• run the full model including the mode choice model to get proper transit forecasts.

Marshall and Gibson were hired by two national public-interest groups, the Congress for the New Urbanism and the Center for Neighborhood Technology, both based in Chicago, which have a grant from the SURDNA foundation to help evaluate the results in cities that have replaced elevated freeways with boulevards and other street improvements and to apply those lessons to cities that are considering what to do with elevated freeways in their downtowns. Smart Mobility's experience includes transportation and planning analysis for the state departments of transportation in New York, Minnesota, Georgia, and New Hampshire among other clients.

The Congress for the New Urbanism is the leading organization applying the principles of city and town design to today's development challenges. Working with architects, planners, transportation engineers, CNU advances walkable, compact neighborhood development as an alternative to sprawl.

For more information, contact Stephen Filmanowicz, CNU, 312-551-7300

Thank you for your consideration.

Sincerely,

Ciara Stewart

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