

Page 5 of 21

9 Page 1-3: In the 3rd paragraph it states “For public safety, bus stops will be temporarily relocated outside of the immediate construction zone.” This is an area of major events and as such, the project needs to consider more specifically how bus staging of these events would occur.

10 Page 1-6, 2nd paragraph: Mention the emergency at-grade crossing discussed in the general City comments earlier in this comment letter.

PURPOSE & NEED (CHAPTER 2)

11 Page 2-3, 2nd paragraph, 1st sentence: SR-519; in its current form, does provide efficient westbound access through the SODO district. The Phase 2 project improves some movements and will make other trips less convenient. Its major benefit is grade separating westbound movements.

12 Page 2-4, full paragraph, 2nd sentence. The major issue is the lack of grade-separation for westbound trips, not poor levels of service at intersections or circuitous routing (some of which will still exist with completion of Phase II of the project). (Comment also applies to page 5-121, first full paragraph.)

DEVELOPING THE ALTERNATIVES (CHAPTER 3)

No comments.

PROJECT DESCRIPTION (CHAPTER 4)

13 Page 4-2, Exhibit 4-1: Members of the freight community have recently expressed concern about the anticipated restriction on trucks turning northbound left turns from 4th Ave S to Edgar Martinez Way. They express an interest in receiving future information about the proposed restrictions' traffic analysis. It is recommended that alternative access routes be identified and guide signs be provided if trucks cannot be accommodated.

14 Page 4-5: According to the EA, improvements to the intersection of First Avenue South and South Atlantic Street could begin first. From a traffic mobility standpoint it is imperative that the improvements to the First Avenue South and South Atlantic Street are completed before closures begin on South Royal Brougham Way.

15 Page 4-5: The EA discusses the development of a construction management plan (CMP) which would identify approaches that best coordinate with and minimize unwanted effects on a bulleted list of items. The bulleted list also needs to specifically identify pedestrian and non-motorized travel through the corridor.

Response to Robert M. Powers, SDOT:

9. WSDOT will coordinate with King County Metro Transit and the Seattle Department of Transportation to facilitate efficient post-event bus staging during construction. Please see our response to Summary Comment 1.

10. The Public Services and Utilities section of EA Chapter 1, Summary, page 1-6, has been revised (Attachment 1) to add: “WSDOT is in ongoing consultation with the City of Seattle and BNSF Railway to determine, from a design standpoint, how street-level emergency access will be provided at the South Royal Brougham Way railroad crossing during project operation.”

11. In addition to the benefits of grade-separating westbound movement at South Royal Brougham Way, the new I-90 off-ramp will provide more efficient access to Seattle waterfront destinations by westbound traffic exiting the freeway system, because that traffic will no longer be routed exclusively onto the existing off-ramp to Fourth Avenue South. Eliminating the circuitous routing that currently results from directing westbound traffic onto a north-south street will improve efficiency.

12. WSDOT concurs, and the text on EA page 2-4 has been revised (Attachment 1) to include grade separation.

13. The northbound left-turn movement from Fourth Avenue South onto westbound South Atlantic Street must be prohibited for all but transit vehicles to maintain the functionality of the intersection. Northbound trucks will have opportunities to make left turns toward the waterfront south of the project area. WSDOT is committed to working closely with the Port of Seattle and City of Seattle to facilitate efficient freight mobility in the area.

14. The improvements at the intersection of First Avenue South and South Atlantic Street will be completed before closures begin on South Royal Brougham Way.

15. The bulleted list on EA page 4-5 has been revised (Attachment 1) to include pedestrian and non-motorized travel.

Page 6 of 21

THE ENVIRONMENT (CHAPTER 5)

- 16 Page 5-4, 1st sentence: Drop the phrase "if any" since there are clearly some adverse impacts on the environment.
- 17 Page 5-7, figure 5-2: Under "Local" and "Seattle Municipal Code," add some detail on the Seattle Noise Ordinance and the Seattle Landmarks Code.
- 18 Page 5-7, figure 5-2: Under "Local" and "City of Seattle Technical Codes," add reference to SDOT Standard Specifications.
- 19 Page 5-8: King County landmarks code has no applicability to this project. Reference should be to Seattle Landmarks Code.

GEOLOGY & SOILS (CHAPTER 5.1)

- 20 Page 5-18, second bullet: This paragraph discusses the anticipation of a seismic hazard on existing structures from the new Atlantic St off ramp. There is a similar issue on Royal Brougham with proposed bridge columns between, and very near to, large diameter pipes. (Comment also applies to Appendix B, page B-6.)
- 21 Page 5-18, third paragraph: Add a statement to this paragraph stating whether the 2000 code or the newer code will apply to this project. As stated there could be problems in the future with other agencies, etc.

AIR QUALITY (CHAPTER 5.2 & APPENDIX E)

No comments.

22 WATER RESOURCES (CHAPTER 5.3 & APPENDIX O)

- 22 Page 5-33, 10th line of 'direct effects': replace reference to 'sewer' in this line with 'storm drain'.
- 23 Page 5-35, 3rd paragraph: Gravel lots are often viewed as impervious. So modify sentences 3 and 4 to read as follows: "However, part of the footprint lies across a moderately to poor pervious 2/3-acre fenced gravel lot (owned by WSDOT) that is bounded A portion of this area will be converted from a slightly pervious area to an impervious area for the new I-90 off-ramp structure."

Response to Robert M. Powers, SDOT:

16. The first sentence on EA page 5-4 has been revised (Attachment 1) to omit the words “if any.”
17. Exhibit 5-2 has been revised (Attachment 1) to include information on the Seattle Noise Ordinance and the Seattle Landmarks Code.
18. Exhibit 5-2 has been revised (Attachment 1) to include a reference to SDOT Standard Specifications.
19. Exhibit 5-2 has been revised (Attachment 1) to remove reference to King County Code 20.62, King County Landmarks.
20. The potential seismic hazards at the new South Atlantic Street off-ramp and for the South Royal Brougham Way structure have been identified as issues that must be addressed during the final design of the structures. For the South Atlantic Street off-ramp, the transition from the new structure to the existing structure will be designed such that neither structure will adversely affect the other. The design process will involve designing the tie between one structure and the other to accommodate expected movements. The response of foundations for the South Royal Brougham Way structure will also be evaluated using numerical modeling methods to establish the amount of foundation movements and the soil reactions to these movements. Specific studies will be conducted to confirm that the existing utilities will not be adversely affected. If these studies show that loading from the foundations could affect the existing utilities, mitigation methods will be used to reduce these effects to acceptable levels. These mitigation methods could involve use of isolation casing around the bridge foundations, placement of protective box sections around the utility, or other similar approaches.
21. A statement was added to the referenced paragraph stating that the latest applicable City of Seattle code will be referenced in the contract documents and will be used when evaluating the response of the large-diameter pipe (Attachment 1).
22. To add clarity, the referenced text on page 5-33 of EA Section 5.3, Water Resources, has been revised (Attachment 1) as follows: “This stormwater is normally conveyed by the Elliott Bay Interceptor to King County’s West Point Treatment Plant for processing to remove suspended material and other contaminants. But during periods of unusually heavy rainfall, some of the project stormwater might be directed into Elliott Bay due to a lack of capacity in the Elliott Bay Interceptor.” Because Appendix O, Water Resources Technical Memorandum, explains the existing stormwater collection system, the combined sewer system, and overflows during heavy rain events in greater detail on pages 4-4 through 4-6, no revision is needed to that text in response to the comment.
23. The gravel lot is treated as pervious in compliance with the WSDOT *Highway Runoff Manual*. This provides a more conservative approach to the analysis and ensures that the proportion of new impervious surface attributable to the project is not under-represented. Field inspection of the gravel lot prior to preparation of the Water Resources Technical Memorandum (Appendix O of the EA) and EA confirmed that the surface is pervious.

Page 7 of 21

24 Page 5-35, 4th paragraph: Modify sentence 3 to read: "The remainder of the project footprint (1.66 acres) consists of sidewalks and the fenced gravel lot. The sidewalk is not considered a pollution-generating surface but the gravel lot can be a pollution-generating surface depending on its use, such as the parking of vehicles and storage of pollutant generating materials. Pollutants will be minimized through consideration of possible contaminated soils from past uses of the gravel lot and by preventing any pollutants at this site during project construction."

25 Page 5-40, first paragraph, 2nd sentence: Replace "During project construction" to "Prior to construction" since the Plan should be in place prior to the beginning of construction activities.

26 Appendix O, page xiii, 3rd paragraph, 1st sentence: ultimately the sediment laden water could go to Elliott Bay.

27 Appendix O, page 1-2: In addition to basic water quality, oil control will be installed where required by code (1st & Atlantic).

28 Appendix O, page 4-1, 1st paragraph: text should read 'proposed' not 'existing'.

29 Appendix O, page 4-1: It's not clear in the 1st paragraph whether the discussion is about stormwater quality in particular when you use the term facilities/system.

NOISE (CHAPTER 5.4 & APPENDIX J)

30 Page 5-43, 4th paragraph: expand to include the fact that the building will act as a barrier and that the perimeter rooftop wall will act as additional buffer.

31 Page 5-47, 2nd paragraph: The hours for impact work (involving impact types of construction equipment, including but not limited to pavement breakers, piledrivers, jackhammers, sandblasting tools, etc.) should be listed in this statement; the hours are 8 AM to 5 PM weekdays and 9 AM to 5 PM weekends and holidays.

32 Page 5-48, first full paragraph: The noise levels for a commercial or industrial zone do not get a nighttime noise reduction according to the Seattle Noise Ordinance. Both the Silver Cloud and the Salvation Army are in one of the two zones.

33 Page 5-50, first bullet point: Not "If necessary." The statement should read, " Will be required to notify the Silver Cloud ..."

Response to Robert M. Powers, SDOT:

24. WSDOT considers the final paragraph on EA page 5-35 to be correct. The first paragraph on EA page 5-40 has been revised to state that “As previously noted, an SPCC Plan will be prepared prior to construction and will be in effect during construction.” (Attachment 1)
25. The temporary erosion and sediment control (TESC) plan will be prepared before construction starts. EA page 5-40, first paragraph, second sentence has been revised (Attachment 1) to state this.
26. Runoff from the project site can follow either route, depending upon flow conditions in the Elliott Bay Interceptor. The referenced text in Appendix O, page xiii, third paragraph has been revised (Attachment 1) to "...ultimately the combined sewer system serving the area or into Elliott Bay."
27. WSDOT’s commitment to oil control from the Stormwater Treatment section of the EA (page 5-38) has been added to the Water Resources Operational Mitigation commitments section of the EA (Attachment 1) and to the Mitigation Commitment List (Attachment 4).
28. The referenced text on page 4-1 of Appendix O has been revised (Attachment 1) from “existing” to “proposed.”
29. The referenced text on page 4-1 of Appendix O has been revised (Attachment 1) as follows: “Following construction, project stormwater conveyance and treatment facilities and the responsibility for their maintenance would be turned over to the City.”
30. Although the walls of the building help to minimize noise from external sources, no significant impact is involved and no mitigation is needed. Further explanation is available in Appendix J, Noise Discipline Report, and does not affect the analysis or conclusions presented in the EA.
31. The referenced text on EA page 5-47 has been revised (Attachment 1) as requested.
32. The referenced text has been revised (Attachment 1) as follows: “In the study area, the Salvation Army residence is in the General Industrial 2 zone (Exhibit 5-18), which does not require a nighttime noise reduction according to the Seattle Noise Ordinance (SMC 25.08.220). Because the Silver Cloud Inn is in the Pioneer Square Mixed zone (Exhibit 5-18), which is a Special Review District (SMC 23.66), the City of Seattle will determine applicable nighttime construction noise requirements.”
33. The words “If necessary” have been removed from the referenced statement on EA page 5-50 (Attachment 1).

Page 8 of 21

- 34 Page 5-50, 2nd bullet point: Any noise variance will require that a live person answer the telephone or email between the hours of 10 PM and 7 AM. (Comment also applies to page 5-7, lines 31-33.)
- 35 Appendix J, page xiv, line 26: Any noise variance will require the use of broadband back-up alarms, especially at night. (Comment also applies to page 5-7, lines 22-24.)
- 36 Appendix J, page xiv- lines 30-32: Unclear what is meant by contractors training their equipment operators. Training them in noise abatement procedures? Please clarify. (Comment also applies to page 5-7, lines 25-27.)
- 37 Appendix J, page xiv, lines 34-35: Any noise variance will require that noise barriers be provided around stationary equipment.
- 38 Appendix J, page xv, lines 1-2: When would it not be appropriate to notify the Silver Cloud and Salvation Army? (Comment also applies to page 5-7, lines 31-33.)
- 39 Appendix J, page 5-6, last bullet point: Instead of specific noise levels, DPD would allow specific construction activities in the noise variance.
- 40 Appendix J, page 5-7, line 11: Impact noise will not be allowed during this window according to the city of Seattle noise ordinance. The hours are 8 AM to 5 PM weekdays, and 9 AM to 5 PM weekends and holidays.
- 41 Appendix J, page 5-7, lines 18-20: Impact noise is only allowed during the hours of 8 AM to 5 PM weekdays, and 9 AM to 5 PM weekends and holidays.

HAZARDOUS MATERIALS (CHAPTER 5.5 & APPENDIX H)
No comments.

- 42 LAND USE (CHAPTER 5.6 & APPENDIX I)
Page 5-66; line 3: "hazards" probably should read "critical areas."
- 43 Page 5-67, lines 8-10: Can the document cite to a particular City plan for these goals?
- 44 Page 5-68, 3rd bullet: replace "or" with "and."

Response to Robert M. Powers, SDOT:

34. Project-specific regulatory compliance procedures will be determined during the permitting phase of the design-build process.
35. Project-specific regulatory compliance procedures will be determined during the permitting phase of the design-build process.
36. The referenced text indicates that equipment should be maintained in good order and controlled by trained operators.
37. Project-specific regulatory compliance procedures will be determined during the permitting phase of the design-build process.
38. Please see our response to SDOT Comment 33.
39. The referenced text on page 5-6 of Appendix J has been revised to present the information provided (Attachment 1).
40. The referenced text on page 5-7 of Appendix J has been revised to present the correct information as provided (Attachment 1).
41. Comment noted. The revision made in response to the preceding comment states this information.
42. In the referenced text on EA page 5-66, “These hazards” has been revised (Attachment 1) to “Hazards associated with these critical areas” to make clear that the hazards relate to the Environmentally Critical Area Regulations under discussion.
43. The referenced statement is based on recommendations from the City of Seattle’s *Livable South Downtown Phase I Staff Report*, page 16. We have cited that report and revised the text on EA page 5-67 (Attachment 1) to: “The project will benefit the City of Seattle’s land use recommendations to place greater orientation on South Atlantic Street for freight and commercial traffic and on South Royal Brougham Way for local vehicle, bicycle, and pedestrian traffic (City of Seattle, 2006a).”
44. The referenced text on EA page 5-68 has been revised to “Coordinating construction around and during scheduled events...” (Attachment 1).

Page 9 of 21

Appendix I: The document suggests that non-industrial uses in the study area are not preferred. For example, at page 1-2: ". . . other uses, such as sports stadiums and commercial businesses have been sited in the area because of its proximity to the

45 downtown core. These new uses are not compatible with the historic uses. They have led to traffic congestion..." See also, discussion on page 6-2, top of 6-10. Non-industrial uses are permitted by City Code to a limited extent in the zoning regulations governing the Industrial General zones (IG 1 and IG 2). Moreover, some non-industrial uses are encouraged by City policy in the Stadium Transition Zone. This is acknowledged in the report on page 4.5 in the discussion of the Stadium Transition Zone (page 4.5, top of page).

46a The EA suggests that acquiring industrial land for transportation purposes maintains the "industrial / transportation" character of the area, as it is described in the report. Maintaining that character by adding transportation infrastructure will, according to the EA, increase the viability of manufacturing uses. The rationale for this assumption is unclear.

46b The Stadium Transition Area Overlay District explicitly recognizes the legitimacy of non-industrial uses. For example, SMC 23.74.002 provides that the District "is intended to contribute to a safer pedestrian environment for those attending events and permits a mix of uses, supporting the pedestrian-oriented character of the area as well as the surrounding industrial zone. . . allowing a mix of uses, including office development, is intended to encourage redevelopment and to maintain the health and vibrancy of the area during times when the sports facilities are not in operation."

46c Therefore, any policy support for the project should not depend on the assumption that non-industrial uses are threatening industrial uses. A possible alternative rationale would be a statement to the effect that the project, and its acquisition of parcels, will promote the viability of traditional industrial uses as well as the mix of other uses encouraged by City policy.

HISTORICAL, CULTURAL & ARCHAEOLOGICAL RESOURCES (CHAPTER 5.7 & APPENDIX F)

47 Appendix F, page 4-37: Under "7 - Recorded Historical Resources," the last sentence of the first paragraph states that "A discussion of these buildings and the Pioneer Square Preservation District follows; Historic Property Inventory Forms are in Appendix C." There are no Historic Property Inventory Forms in Appendix C.

Response to Robert M. Powers, SDOT:

45. The quoted text from Appendix I (Land Use Discipline Report) is correct as stated, and we concur that the discussion of the Stadium Transition Area Overlay District acknowledges that the City of Seattle encourages some non-industrial uses within that zone.

46a. On page 5-68, the EA states that “By improving freight movement, the project could help to offset [the effect of non-industrial land use expansion in the study area], making it more likely that industrial and freight-dependent businesses will remain in the area.”

46b. Policy promulgated by the Stadium Transition Area Overlay District recognizes the legitimacy of non-industrial uses within the district. As the Land Use Discipline Report (Appendix I) states on page 4-5, “The intent of this district is to improve the pedestrian environment of the area while also protecting the surrounding industrial uses and encouraging uses complementary to a stadium. Uses such as museums and religious facilities are allowed, while uses related to heavy manufacturing, schools, solid waste management, and drive-in businesses are not allowed.”

46c. EA page 5-68 has been revised (Attachment 1) to state that the project will enhance access to the Stadium Transition Area Overlay District and will be consistent with its goals, while also improving regional freight movement.

47. The historic property inventory forms have been included as errata in Attachment 1. They comprise Appendix C of the Cultural Resources Discipline Report. The Cultural Resources Discipline Report is Appendix F of the EA.

Page 10 of 21

48 Appendix F, page 4-39, table 4-19: General Comment: Under NRHP & SL Status - should be modified to indicate that the determinations about City landmark status are the judgments of the consultants, not the Seattle Landmarks Preservation Board.

49 Appendix F, page 4-40: The discussion of the Frederick & Nelson Warehouse does not include a discussion of how the building may qualify for local landmark designation despite having identified it as eligible in the chart on 4-39.

50 Appendix F, page 4-40: Discussion of Great Floors/Carpet Exchange Building. NRHP eligibility information is not in the Appendix and should be included. There is no discussion of why the consultant finds that the property doesn't qualify for local landmark designation.

51 Appendix F, page 4-41: Pacific Office/Romac Industries. If the documentation is not available for the building's potential eligibility, there should be a new request made to DAHP for that determination. Simply relying on another document that is 10 years old is not sufficient. Likewise, relying on another consultant's determination as to local landmark qualifications is also not sufficient.

52 Appendix F, pages 4-37 through 4-41: As noted in earlier comments, there should be documentation for the National Register eligibility. If that information is not available, a new request to DAHP should be made. With regard to local landmark status, there should be a clear distinction between the consultant's judgment and reference to the City SEPA requirement to refer such properties to the Landmarks Preservation Board for consideration as a landmark. It appears that the consultants have made an assumption that since a property has been determined not eligible for listing in the National Register, it is also not eligible as a City Landmark. That is not always the case.

53 SOCIAL AND ECONOMIC (CHAPTER 5.8 & APPENDIX L)
Page 5-97, 3rd bullet point: How much advance notice prior to road closures?

54 Page 5-97, 4th bullet point: What types of noise buffering devices?

55 Page 5-98, 1st complete bullet point: How much advance notice prior to removing or relocating transit stops?

56 TRANSPORTATION (CHAPTER 5.9 & APPENDIX M)
Page 5-106: Provide definitions for the size of trucks that the volume data is provided for.

Response to Robert M. Powers, SDOT:

48. Table 4-19 has been revised to add a footnote to show this clarification (Attachment 1).

49. Per the historic property inventory forms that have been included in the errata (Attachment 1), the Fredrick and Nelson building is associated with the period of Seattle's history characterized by massive railroad improvements, tidelands development, and commercial expansion between 1900 and 1910, and the building retains historic integrity. As referenced in the forms, the Seattle Department of Planning and Development determined that the building is likely to meet Seattle Landmark Designation Criteria in the Draft Environmental Impact Statement for Livable South Downtown Planning (City of Seattle, 2007a).

Under the Seattle Municipal Code, a property that is likely to meet Seattle Landmark criteria must be formally reviewed for designation before demolition. Actual determination of eligibility can be made only by the Seattle Landmarks Preservation Board. However, per the EA, no adverse effects to historic structures have been determined as result of the SR 519 Project Phase 2.

50. The historic property inventory forms have been included in the errata (Attachment 1). The State Historic Preservation Officer has concurred with WSDOT's National Register eligibility determinations per correspondence dated January 15, 2008, that was provided in Appendix C of the EA. Per the historic property inventory forms, the Great Floors/Carpet building lacks historical significance and architectural integrity, and is unlikely to meet Seattle Landmarks Designation Criteria.

51. The historic property inventory forms have been included in the errata (Attachment 1). The State Historic Preservation Officer has concurred with WSDOT's National Register eligibility determinations per correspondence dated January 15, 2008, that was provided in Appendix C of the EA. Per the historic property inventory forms, this building was surveyed on August 8th, 2007.

52. The historic property inventory forms have been included in the errata (Attachment 1). The buildings were field recorded on August 8, 2007. The State Historic Preservation Officer has concurred with WSDOT's National Register eligibility determinations per correspondence dated January 15, 2008, which was provided in Appendix C of the EA. Per the historic property inventory forms, the physical integrity of the Great Floors/Carpet building and the Pacific Office (Romac) building has been compromised, and these structures are unlikely to be eligible for Seattle Landmark designation. Under the Seattle Municipal Code, a property that is likely to meet City landmark criteria must be formally reviewed for designation before demolition. Actual determination of eligibility can be made only by the Seattle Landmarks Preservation Board. However, per the EA, no adverse effects to historic structures have been determined as result of the SR 519 Project Phase 2.

53. Please see our response to Summary Comment 1.

54. Please see our response to Summary Comment 1.

55. Please see our response to Summary Comment 1.

56. Truck load sizes included in the analysis consisted of those classified by WSDOT under the Washington State Freight and Goods Transportation System (FGTS). This statement has been added to the EA on page 5-106 (Attachment 1). The revision also refers the reader to the discussion of FGTS freight tonnage classifications under the heading "What truck facilities are provided in the study area?" (EA page 5-114).

Page 11 of 21

57 Pages 5-107 and 5-114: Regarding truck routes, the Transportation Strategic Plan contains a street classification map with three classifications of arterials and classifications for local streets. All arterials are considered to be truck routes, which are streets where trucks are allowed and encouraged to travel in Seattle. SDOT has posted guide signing on selected arterial streets to provide positive guidance.

58 Pages 5-107 and 5-114 and exhibits 5-31 and 5-36: The figure and the narrative identify "Major Truck Routes". The official policy designation in the Seattle Comprehensive Plan is for a system of designated Major Truck Streets, versus routes. The authors have reinterpreted city policy and language, contrary to SDOT practices. This could create confusion with the freight community, and request that the language be modified, in keeping with SDOT practices. Here is language from the city plan - The Seattle Comprehensive Plan calls for the designation of a network of Major Truck Streets to serve as primary routes for the movement of good and services. The specific network of Major Truck Streets is defined in Seattle's Transportation Strategic Plan (TSP) and is illustrated on the Major Truck Streets network map. A Major Truck Street is a street classification for an arterial street that accommodates significant freight movement through the City, and to and from major freight traffic generators. Some state routes and highways are also designated as Major Truck Streets on the network map. SDOT uses the designation as an important criterion for street design, traffic management decisions, and pavement design and repair.

59 Page 5-107 and 5-114 and exhibits 5-31 and 5-36: S Atlantic Street does not have the Major Truck Street designation at this time. SDOT expects that the city's Comprehensive Plan will be amended during the next applicable amendment cycle to apply this policy designation to Atlantic Street and Edgar Martinez Way.

60 Page 5-109: In the discussion of Event Traffic the report does not detail the amount of traffic which comes from transit and how these transit services will be accommodated once parking and/or staging area is lost on First Avenue South and South Royal Brougham Way.

61 Page 5-110: In the section labeled "What are the pedestrian and bicycle facilities in the study area?" the next line should replace "pedestrian" with "multi-use." It should read as follows: "Within the study area there are three main multi-use pathways:" Additionally, Exhibit 5-36 should show the western multi-use pathway on the west side of Alaskan Way S consistent with the first bullet on page 5-110.

Response to Robert M. Powers, SDOT:

57. Many roadways in the study area are designated as Major Truck Streets by the City of Seattle and as Major Truck Routes by WSDOT. In the study area, overlaps of these designations occur on SR 99, South Royal Brougham Way, and portions of Fourth Avenue South and I-90. EA page 5-106 and Exhibit 5-31 have been revised to make this distinction clear and avoid confusion between overlapping designations (Attachment 1). The referenced discussion on EA page 5-114, which refers collectively to both designations, has been revised to refer to “designated truck facilities” in this context (Attachment 1).

58. Please see our response to SDOT Comment 57.

59. Please see our response to SDOT Comment 57.

60. The referenced text on EA pages 5-109 and 5-110 describes event traffic under existing conditions. Transit service in the study area is described in greater detail on EA pages 5-112 through 5-114. During project construction, WSDOT will coordinate with King County Metro Transit, the Seattle Department of Transportation, and the Seattle Police Department to minimize adverse effects of construction activities on the staging of buses before, during, and after events. Event traffic is managed by the City of Seattle. Please see our response to Summary Comment 1.

61. The text on EA page 5-110 has been revised to state that the three pathways are multi-use (Attachment 1). The first bullet point has been revised to state that a multi-use trail is present along Alaskan Way South, northward of South Royal Brougham Way (Attachment 1). This trail is shown correctly on Exhibit 5-36.

Page 12 of 21

- 62** Page 5-110, figure 5-35: What is the source of this information? What year(s) are represented?
- 63** Page 5-111, Figure 5-36: There is also a mid-block pedestrian crossing on 4th Avenue South at the Weller Street Bridge.
- 64** Page 5-121: In the section titled "What direct effects will construction of the project have on transportation" it suggests that "the phased construction approach described in Chapter 4 will help to limit lane closures..." In fact, the construction approach described in Chapter 4 only suggests that First and Atlantic *could* begin first. It is imperative for traffic operations and traffic mobility that the intersection of 1st and Atlantic be operationally completed first.
- 65** Page 5-121: In the same section, there should be discussion of construction worker parking, including number of parking spaces required for such use.
- 66** Page 5-121, 1st complete paragraph, last sentence: Reference should be to Exhibit 5-40 rather than Exhibit 5-39.
- 67** Page 5-124, 1st paragraph, last sentence: Will the protected walkway be bicycle-friendly?
- 68** Page 5-125: In the first paragraph, the EA states a commitment to complete the overhead crossing of the Sound Transit Central Link light rail tracks before regular service begins in 2009. Is this commitment achievable and will it also be contained in the RFP?
- 69** Page 5-125: Paragraph under "Freeway Operations." Text should mention that northbound I-5 traffic will not be able access the 4th South ramp anymore, but will have to go to Atlantic.
- 70** Pages 5-126 & 5-127: Text should mention that there will no longer be left-turns from northbound 4th Avenue to westbound Atlantic Street except for transit.
- 71** Page 5-128 – discussion of event traffic and parking management. WSDOT and its contractors will need to work with SDOT's Traffic Operations group to appropriately mitigate construction impacts on event traffic and parking. This will be especially important for major time-specific events (15,000 or more in expected attendance).

Response to Robert M. Powers, SDOT:

62. The numbers in Exhibit 5-35 on EA page 5-110 are presented in the Transportation Discipline Report, pages 4-10 through 4-12. This source has been added to Exhibit 5-35 (Attachment 1). The average attendance for Safeco Field is based on 2006 data, according to information provided by Safeco Field in their 2007-2008 Transportation Management Plan. In response to Comment 18 by the Seattle Mariners, the number has been revised from 33,000 to 37,000 to reflect average attendance since the facility was built. Average attendance for Qwest Field, obtained from their 2006-2007 Transportation Management Plan, is not specified by year.

63. We have revised EA Exhibit 5-36 to include the mid-block pedestrian crossing at the Weller Street Pedestrian Bridge (Attachment 1).

64. The text on EA page 4-5 has been revised (Attachment 1) to state: "Improvements to the intersection of First Avenue South and South Atlantic Street will begin first, with construction starting in the fall of 2008 and lasting 6 to 9 months." The associated figure titled Proposed Construction Schedule has been deleted (Attachment 1).

65. The referenced EA text (Attachment 1) and Mitigation Commitment List (Attachment 4) have been revised to include the following statement: "Construction worker parking will be allowed on construction staging areas and other publicly and privately available parking. Public street right-of-way will not be set aside as construction worker parking unless approved by the City of Seattle."

66. The reference to Exhibit 5-39 on EA page 5-121 has been changed to Exhibit 5-40 (Attachment 1).

67. Please see our response to Seattle Mariners Comment 21.

68. The referenced text on EA page 5-125 has been revised (Attachment 1) as follows: "To avoid interference with the ongoing King County Metro Transit capital improvement project at Ryerson Bus Base, WSDOT will not enter the Ryerson Bus Base to start construction of the new I-90 off-ramp until September 2009, which is after Sound Transit's Central Link light rail line is operational. WSDOT will coordinate with Sound Transit and King County Metro Transit to minimize impacts on their operations."

69. The referenced text on EA page 5-125 has been revised (Attachment 1) to include the following statement: "The new I-90 off-ramp will be entirely elevated, passing over Fourth Avenue South and Third Avenue South and connecting to the north side of the South Atlantic Street overpass. Exiting northbound I-5 traffic will be routed to South Atlantic Street, while exiting southbound I-5 traffic will have the option of using either the new off-ramp to South Atlantic Street or the existing I-90 off-ramp to Fourth Avenue South."

70. The referenced text on EA page 5-127 has been revised (Attachment 1) to include the following statement: "To avoid blocking the intersection of the new I-90 off-ramp and the South Atlantic Street overpass, left turns from northbound Fourth Avenue South onto westbound South Atlantic Street will be prohibited except for transit. WSDOT does not anticipate that this change will adversely affect surface street operations, including freight, because left turns for vehicles traveling north on Fourth Avenue South will be available at intersections south of South Atlantic Street and at South Royal Brougham Way."

71. During construction, WSDOT will coordinate with the Seattle Department of Transportation's Traffic Operations group to mitigate construction-related effects on event traffic and parking. The referenced text on EA page 5-128 has been revised to state that WSDOT will coordinate with the City of Seattle (Attachment 1). Please see our response to Summary Comment 1.

Page 13 of 21

- 72** Page 5-129 First paragraph, 1st sentence: States that there would be no truck access across the BNSF mainline "during events." This should read "before or after events", since this is when the traffic congestion occurs.
- 73** Page 5-129: Provide a table to present year 2030 truck volume projections and percent of traffic, based on the forecast methodology provided in the Transportation Discipline Report.
- 74** Page 5-129: Provide a table to present projected year 2030 rail activity at Royal Brougham, including freight and passenger trains, and the associated switching movements made for maintenance, fueling and train assembly functions.
- 75** Page 5-129: Recommend that the project provide truck guide signing to and from the waterfront, the industrial area and downtown, both on the arterial and the interstate facilities. Many trucks come from other parts of the country and drivers may not be familiar with the appropriate routes to access their destinations. In addition, Seattle has a restriction on trucks exceeding 30' and above length in the downtown area.
- 76** Page 5-130: In the third paragraph, the EA indicates that the project will not alter the intersection of South Royal Brougham Way and First Avenue South. This is not true. Since traffic is now being routed to Atlantic the intersection will have to be modified. Channelization, signal heads and signal timing will need to be revised to accommodate these traffic modifications.
- 77** Page 5-131 and following: There should be a discussion of mitigating the impacts of construction worker parking.
- 78** Page 5-132, 1st sentence at top of page: "Construction management strategies could include ..." "Could" in this instance should be "would" since all of these measures are clearly necessary. As originally written, the contractor does not have to perform these functions. These measures should also be included in the RFP.
- 79** Page 5-132: In the next paragraph, after the 4 bullets on this page, the EA indicates that WSDOT will meet with a variety of interested parties. This list should also include the Seattle Fire Department (SFD) as a life safety responder. In this same paragraph, the EA states that WSDOT will temporarily stop or alter construction activity during sports events at the stadiums and coordinate closely with Qwest Field Event Center to minimize traffic congestion during major exhibitions. This should also include construction

Response to Robert M. Powers, SDOT:

72. EA page 5-129 has been revised (Attachment 1) to state that for trucks exiting I-5, “there would be no access across the BNSF mainline to the Port of Seattle in the hours before, during, and after events unless trucks only were permitted onto South Atlantic Street, depending on the level of the event.”

73. Year 2030 truck volumes were not projected. However, truck volume growth rates, based on the Heffron 2005 analysis for the Port of Seattle, were considered in the EA transportation analysis. Future growth rates for truck volumes are discussed in the *Transportation Discipline Report*, page 5-25, and are assumed as 3 percent per year from 2002 through 2015 and as 2 percent per year from 2015 through 2030. The EA discussion was revised on page 5-129 to include this information (Attachment 1).

74. The referenced discussion of rail operations and crossings has been revised (Attachment 1) to state that “Rail activity projections for 2011 and 2030 are presented in Appendix M, Transportation Discipline Report.” Data regarding growth in railroad switching activity for maintenance, fueling, and train assembly functions were not available at the time of the analysis presented in the Transportation Discipline Report. Projections for 2011 and 2030 rail activity are presented in the Transportation Discipline Report, pages 5-30 and 5-31. Projected 2030 rail activity was included in the analysis of future train service at the intersection of Fourth Avenue South and South Royal Brougham Way.

75. If warranted, WSDOT will install signage appropriate for the improvements made as part of the project. The discussion under “Truck Routes” on EA page 5-129 has been revised to state this (Attachment 1).

76. The referenced statement on EA page 5-130 has been revised (Attachment 1) to explain that there will be no physical alteration to the intersection of South Royal Brougham Way and First Avenue South, except for modifications to surface painting and traffic signals.

77. Please see our response to SDOT Comment 65. No mitigation measures will be necessary.

78. Please see our response to Summary Comment 1.

79. We have revised the referenced text on EA page 5-132 to include the Seattle Fire Department (Attachment 1). The paragraph has been revised to: “WSDOT is meeting with interested parties, including representatives from the Seattle Department of Transportation, the Seattle Police Department, the Seattle Fire Department, Safeco Field, Qwest Field, Qwest Field Event Center, and the Port of Seattle, to plan and coordinate the management of event traffic and parking at the stadiums and event center during construction of the project. It was assumed that future sports events will be scheduled in a manner similar to the present, with the majority of baseball games during weekday evenings and most of the football games on Sundays. WSDOT will temporarily stop or alter major construction activity before, during, and after major sports events at the stadiums and major event center exhibitions, and coordinate closely with the facilities to minimize traffic congestion” (Attachment 1).

Page 14 of 21

activities which may cause significant noise or otherwise interfere with events in these facilities. Depending on the impacts, traffic for instance, the temporarily stop or alternation may be needed before and after major events, rather than or in addition to during the event.

80 Page 5-133: On this page, under street intersections, two operational solutions exist for the intersection of 1st and Massachusetts. If this intersection will meet signal warrants then the project should install a signal at this location. WSDOT should coordinate with SDOT's Signal Operations staff in the implementation of the mitigation measure. (Comment also applies to Appendix B, page B-18.)

81 Page 5-134: Under the Event Traffic section, it states that "Additional variable message signs along I-5 could be used to alert drivers that access into the stadium area is restricted during events and advising them of alternative routes." Is WSDOT proposing to build extra signage to support this mitigation measure?

82 Page 5-134: Under "event traffic" there should be discussion of pedestrian mitigation.

83 Page 5-135, 1st full paragraph: Add mention of emergency access at street-level crossing of Royal Brougham.

84 Page 5-135, first complete paragraph: "Instead, buses could be lined up on the elevated ramp....." Is the elevated ramp designed for a line of buses? Lanes need to be open for emergency response vehicles at all times.

85 Page 5-136: The description of the Spokane Street Viaduct Widening Project does not entirely describe the project description. The westbound off-ramp at 4th avenue will be removed. A new westbound on- and off-ramp will be constructed at 1st Ave S. This will redistribute all traffic, including trucks, routing from 4th Ave S to 1st Ave S. Traffic demand could decrease on 4th Avenue and increase on 1st Ave S. Confirm that this traffic redistribution was appropriately considered in the out year traffic assessments or determine if this would be changes in the LOS projections.

PUBLIC SERVICES & UTILITIES (CHAPTER 5.10 & APPENDIX K)

86 Page 5-140, sentence immediately following the 2nd question on the page: States that mitigation "could" include these measures. The six measures that follow will all clearly be needed to mitigate impacts during construction.

Response to Robert M. Powers, SDOT:

80. Please see our response to Summary Comment 3.

81. Text referring to variable message signage has been removed from the Event Traffic discussion on EA page 5-134 because WSDOT's use of such signage is not related to event traffic (Attachment 1). A new section, Freeway System, has been added to the Operational Mitigation discussion, explaining that the addition of a variable message sign is an option WSDOT is considering to provide travel information to westbound drivers on I-90 west of the I-5/I-90 interchange (Attachment 1).

82. EA page 5-134 has been revised (Attachment 1) to provide a brief discussion of pedestrian-related mitigation during stadium-area events, as follows: "Pedestrian traffic before and after events in the stadium area is heavy, and there is a high potential for conflicts and safety hazards between pedestrians and both vehicle and railroad traffic. The Seattle Police Department mitigates these conditions by controlling intersections and pedestrian movements in the stadium area during major sports events and exhibitions."

83. The provision of street-level emergency access at the South Royal Brougham Way railroad crossing is discussed in the Public Services and Utilities section on EA page 5-141 and in Chapter 4, Project Description, on EA page 4-4.

84. The comment is correct: one lane in each direction will be kept open for emergency response vehicles. The text on EA page 5-135 has been revised (Attachment 1) to clarify this and remove the discussion of bus staging. During project operation, discussed here, the City of Seattle will be responsible for traffic and parking management on city streets, including South Royal Brougham Way.

85. The requested additional information has been added to the description of the Spokane Street Viaduct Widening Project in Exhibit 5-44 on EA page 5-136 (Attachment 1). The PSRC regional model based on the projects identified in the Metropolitan Transportation Plan (MTP) was used to develop travel demand for the Transportation Discipline Report (see TDR Chapter 3, Methodology). The latest configuration of the South Spokane Street Viaduct Widening Project is included in the MTP and PSRC Travel Demand Model.

86. Please see our response to Summary Comment 1.

Page 15 of 21

- 87** Appendix K, page 35: Mention needs to be made of the existing 24" sewer in 3rd Ave S that, if protected in place, will be underneath the new embankment of the ramp to the Royal Brougham Way structure.
- 88** Appendix K, pages 4 and 5: Revise the last bullet to reflect that notification of Seattle Public Utilities (SPU) customer interruption will be through SPU customer service (same as main report).

VISUAL QUALITY (CHAPTER 5.11 & APPENDIX N)

Page 5-145 through 5-157: The Visual Quality section notes that in the area of the stadiums, an entertainment district is being developed and that further away from the stadiums and exhibition facilities development and revitalization pressures are also present. The project being proposed is in close proximity to the stadiums and as such has a need for a high visual quality. As noted on Page 5-145, the Seattle Design Commission (SDC) provides review and recommendations to the project proponents regarding project design and implementation. As such, this project will be required to present its urban design and visual qualities to the SDC. Those elements of the project that will be turned over to the City of Seattle will require City approval of the design and will require consistency with the City's Comprehensive Plan per the State's Growth Management Act.

- 89** present. The project being proposed is in close proximity to the stadiums and as such has a need for a high visual quality. As noted on Page 5-145, the Seattle Design Commission (SDC) provides review and recommendations to the project proponents regarding project design and implementation. As such, this project will be required to present its urban design and visual qualities to the SDC. Those elements of the project that will be turned over to the City of Seattle will require City approval of the design and will require consistency with the City's Comprehensive Plan per the State's Growth Management Act.
- 90** Page 5-145, 2nd to last paragraph, 1st sentence: Add "including SR-519" after the word "projects."
- 91** Page 5-148, 6th bullet: What does "localized impediments" mean with respect to impacts on views?
- 92** Page 5-156, 2nd full paragraph under "Operational Mitigation": The design needs to be consistent with City of Seattle design directives and policies.
- Page 5-156: In the 2nd to last paragraph, the EA makes reference to the "Roadside Funding Matrix for WSDOT Capital Projects". This document defeats the process that the City and State have entered into on supporting the SR 519 Phase II project. WSDOT be will responsible for design and implementation of the project consistent with City of Seattle design directives and policies. (Comment also applies to Appendix B, Page B-23.)
- 93**

Response to Robert M. Powers, SDOT:

87. Page 3-7 of Appendix K, the Public Services and Utilities Technical Memorandum, has been revised to include mention of the 24-inch sewer line beneath Third Avenue South (Attachment 1).

88. The referenced text on page 4-5 of Appendix K, the Public Services and Utilities Technical Memorandum, has been revised to state that any anticipated interruption of City of Seattle services will be coordinated with Seattle Public Utilities (Attachment 1).

89. Please see our response to SDOT Comment 3. Project components to be transferred to the City of Seattle after construction will require City design concurrence and must be consistent with the Seattle Comprehensive Plan.

90. The referenced text on EA page 5-145 has been revised as requested (Attachment 1).

91. The following explanation has been added to the referenced text on EA page 5-148 (Attachment 1):
“Localized minor impediments to views’ refers to the South Atlantic Street overpass, the Fourth Avenue South off-ramp, and buildings adjacent to Fourth Avenue South. All of these structures partially block north and south views along Fourth Avenue South to some degree. The new I-90 off-ramp to South Atlantic Street will add a visual element to the approximately 725-foot section of Fourth Avenue South located between the South Atlantic Street overpass and Fourth Avenue South off-ramp. The elevated structure will be seen looking north toward downtown and will block views along approximately 200 to 300 feet of Fourth Avenue South. It will also block some views to the south along the same section of Fourth Avenue South.”

92. WSDOT will continue to consult and coordinate with the City of Seattle, including the Seattle Design Commission, with respect to visual quality and urban design elements of the project.

93. The EA refers to the Roadside Funding Matrix because the matrix outlines WSDOT's legal funding limitations. WSDOT will provide the appropriate context-sensitive solutions, per our policies, and commit to ongoing coordination with the City of Seattle about urban design.

Page 16 of 21

- 94 Page 5-156: Last paragraph indicated that the project will produce design standards, not guidelines, in support of the visual quality. Since the City of Seattle will own and operate portions of this project, the City must be involved in the development of these design standards and must approve the design of any facilities that will be owned by the City or that will be placed on City-owned right-of-way.
- 95 Page 5-157, Partial sentence at top of page: Add "including the City of Seattle" after "appropriate parties."
- 96 Page 5-164: The table entry for the South Spokane Street Bridge does not mention the 4th Ave S off-ramp construction.
- 97 Page 5-161: Suggest another project be added to the list - the Duwamish ITS Project which is implementing a set of traffic technology investments in the Duwamish area.
- 98 Page 5-166, 1st paragraph under "Will the project make a substantial contribution to any adverse cumulative effects", last sentence: "and noise" - statement seems at odds with discussion of cumulative impacts in noise section (page 5-53).
- 99 Appendix N, page xii: This page defines the middle ground as 2.5 miles; page 3-1 defines it as 5 miles.
- 100 Appendix N, page xvi: Isn't the rating decrease for Viewpoint 4 (from 3.9 to 2.5) more than slight?
- 101 Appendix N, page 4-4: Where are pedestrians and bicyclists (other than stadium / event patrons) discussed in the text?
- 102 Appendix N, page 4-8: There is a view of Mt. Rainier discussed in the mitigation section; where is it discussed in the Viewpoint analyses? Landscape Unit 2 or possibly 1 would be an appropriate place.
- 103 Appendix N, page 4-14, line 4: What does "shadow" mean in this sentence?
- 104 Appendix N, page 4-17: Pacific Marine Hospital (a.k.a. Amazon) is visible when looking east on Royal Brougham Way. Does the project block the view of this designated historic landmark?

Response to Robert M. Powers, SDOT:

94. Please see our response to SDOT Comment 89.

95. The wording “including the City of Seattle” has been added to the referenced text on EA page 5-157 (Attachment 1).

96. Exhibit 5-55 on EA page 5-164 states that one purpose of the South Spokane Street Viaduct Widening Project is to “Construct a new eastbound loop ramp to Fourth Avenue South, to the south of South Spokane Street.”

97. Comment noted. The EA text on page 5-161 explains that the list of reasonably foreseeable future actions (RFFAs) includes “some of the larger” projects. We are aware that many other RFFAs could be added to the list. In compliance with FHWA and Council on Environmental Quality guidance, the list of RFFAs is not exhaustive.

98. The inclusion of noise in the referenced text on EA page 5-166 was a typographical error and has been corrected (Attachment 1).

99. The correct definition of middle ground is 5 miles. The text on page xii of Appendix N, Visual Quality Discipline Report, has been revised (Attachment 1) to be consistent with EA page 3-1.

100. A decrease in the visual quality rating of 3.9 to 2.5 is a decrease of from slightly below average to between moderately low and low (see Glossary in Appendix N Visual Quality Discipline Report, for definitions of “moderately low” and “low”). This could be considered a slightly moderate to slight decrease.

101. Pedestrians and bicyclists are discussed as their own category in the second-to-last paragraph on page 4-4 of Appendix N, Visual Quality Discipline Report.

102. The following information has been incorporated on page 4-6 of Appendix N, Visual Quality Discipline Report (Attachment 1): “Mount Rainier is not visible from any of the viewpoints selected for detailed assessment. It can be seen from parts of Fourth Avenue South near the project area, although the existing presence of the elevated South Atlantic Street overpass (and associated ramps on Fourth Avenue South) and the I-90 off-ramp to Fourth Avenue South partially block views of the mountain.”

103. In Appendix N, Exhibit 4-7, the north side of the Fourth Avenue South off-ramp can be seen. The day the photo was taken was sunny and the photo was taken at mid-day. The north face of the off-ramp is in shadow and is darker in color (and contrast) than it would appear to be at different times of day and during less sunny days.

104. The following information has been incorporated into Appendix N, Visual Quality Discipline Report, on page 5-10 (Attachment 1): “If one looks east along South Royal Brougham Way from First Avenue South, the Pacific Marine Hospital can be seen. It is located between Safeco Field and the Qwest Field Event Center just above three existing transportation structures: the existing I-90 off-ramp to Fourth Avenue South, the South Atlantic Street on-ramp to I-90, and the Fifth Avenue South bus ramp to I-90. The proposed loop-ramp structure would not block views from the western portion of South Royal Brougham Way, but it would add another large-scale visual element. The structure would block views from beneath it.”

Page 17 of 21

105 Appendix N, page 4-24: Line beginning SMC (Specific environmental policies) is missing a citation - should be 25.05.675

106 Appendix N, page 5-2: Statement is made that "views toward the offramp from north and south of it" would be blocked. Isn't this only true of views from the north? Looking at Viewpoint 6, it appears that when looking from the south, the new structure blocks views of the existing structure, so it would also block any other views.

107 Appendix N, page 5-2: Are there any SEPA-protected views along Royal Brougham, e.g., the Olympic Mountains? If so, are there impacts to those views? Viewpoint 3 suggests that the project would have a high degree of impact of any existing views.

108 Appendix N, page 5-4: According to the response to the comment on the draft Visual Quality Discipline Report, the new trees will approach the same size as the existing trees in 10 years from the completion of the project. How can removing a tree and replacing it over a ten year period with the same size tree be considered even a slight improvement in vividness and intactness? It doesn't seem appropriate to consider this an improvement, especially when considering that there will be project-related shadows cast on the new trees and the new plaza.

109 Appendix N, page 5-6: 1) The text does not analyze the presence of the ramp itself or its effects on visual quality. The new ramp blocks a significant portion of the existing view looking west on Royal Brougham Way and adds marked shadows. (2) While the mitigating portions of the project (the plaza, trees and the pedestrian entrance to the ramp) may add human scale elements, the project will also be removing existing human scale elements -- the mature trees on the south side of the street. The pedestrian plaza at the center of the circular ramp may be an interesting space during game days, but most of the year, and at night, it could be problematic because the potential for attracting graffiti, vandalism and other negative social elements could decrease activity and make it an eyesore. Sightlines to the plaza from the street will be obscured by other project elements. (3) The text and the table are inconsistent: according to the text, the Project creates a slight increase in intactness, but the table shows a marked decrease in intactness from 2.5 to 2.0. (4) What is the rationale for increasing the "unity" score from 2.0 to 3.0? The text refers to a "slight" increase in vividness, intactness and unity.

110 Appendix N, page 5-8: The slightly lowered rating of Viewpoint 3 does not seem appropriate. The overpass and the fence obliterate any existing view. The rating should be decreased similar to the decrease in the Viewpoint 4 rating.

Response to Robert M. Powers, SDOT:

105. We have added a citation for SMC 25.05.675 on page 4-24 of Appendix N, Visual Quality Discipline Report, 2nd paragraph, 5th line (Attachment 1).

106. The referenced text on page 5-2 of Appendix N, Visual Quality Discipline report, has been revised (Attachment 1) to state that “The new off-ramp would block views along Fourth Avenue South between the existing South Atlantic Street overpass and the existing I-90 off-ramp to Fourth Avenue South.”

107. From the roadway surface (not the sidewalks) of South Royal Brougham Way at Fourth Avenue South, parts of the Olympic Mountains are visible on clear days to the west between the upper and lower levels of the Alaskan Way Viaduct. This is a SEPA-protected view as defined by Subsection P (Public View Protection) of SMC 25.05.675. The view to the east from this intersection is not SEPA-protected, but does include a view of the Pacific Marine Hospital. The view of the downtown Seattle skyline north along Fourth Avenue South from its intersection with South Royal Brougham Way is SEPA-protected. The view south along Fourth Avenue South from that same intersection, toward Mount Rainier, is not SEPA-protected. This information has been incorporated into Appendix N, Visual Quality Discipline Report, on page 4-10 (Attachment 1).

With respect to the Olympic Mountains, the SEPA-protected view to the west from the new ramp on South Royal Brougham Way would not be blocked. However, ground-level views of the Olympic Mountains between the upper and lower levels of the Alaskan Way Viaduct would be blocked. Views toward the new I-90 off-ramp from many areas south of it on Fourth Avenue South would be partially blocked by the South Atlantic Street overpass and its ramps to Fourth Avenue South. This information has been incorporated into Appendix N, Visual Quality Discipline Report, on page 5-10 (Attachment 1). The SEPA-protected view from areas of Fourth Avenue South north of the new I-90 off-ramp, already partially blocked by the existing I-90 off-ramp to Fourth Avenue South, would be further affected by the new I-90 off-ramp. It would partially block some views north toward downtown Seattle along approximately 200 to 300 feet of Fourth Avenue South. This information has been incorporated into Appendix N, Visual Quality Discipline Report, on page 5-14 (Attachment 1).

108. The following information has been incorporated into Appendix N, Visual Quality Discipline Report, on page 5-4 (Attachment 1): “Four existing trees along the south side of South Royal Brougham Way would be removed. New trees along the north side of South Royal Brougham Way would be planted between existing trees and would, over time, help to create a more uniform alignment of street trees. The addition of a new pedestrian plaza at the corner of Fourth Avenue South and South Royal Brougham Way would add pedestrian-oriented urban design elements to the area and block existing views of the storage areas along the BNSF Railway tracks and the east side Safeco Field. These measures would improve the vividness and intactness of the scene viewed from this location and would more than compensate for the removal of the four existing street trees.”

109.

1) The following information has been incorporated into Appendix N, Visual Quality Discipline Report, on page 5-6 (Attachment 1): “The loop ramp would add a new visual element to the view from along South Royal Brougham Way (see Exhibits 5-2, -3, and -4). The presence of the ramp was considered in the assessment of Viewpoints 2, 3, and 4. The ramp would block parts of the existing view to the west from South Royal Brougham Way toward First Avenue South and the Alaskan Way Viaduct. The loop ramp’s associated pedestrian plaza would block views of the storage areas for equipment and materials along the BNSF Railway tracks and the east side of Safeco Field, improving visual quality.”

2) Along with the information above, page 5-6 of Appendix N, Visual Quality Discipline Report (Attachment 1), now notes that “During project operation, the City of Seattle would be responsible for managing the pedestrian plaza.”

(continued)

Page 18 of 21

Appendix N, page 5-12: The changes to the 1st Ave South / Atlantic St. are characterized as "surface improvements that would not have much effect on existing landscape character / visual quality." Existing street trees are being removed from the south side, and 20 - 25 feet of new asphalt road lanes are being added. The potential new street trees mentioned in the text are not shown in the visualization, nor would the textured crossing be visible to anyone but a pedestrian. Any increase in the visual quality rating seems difficult to justify, and a decrease would be relatively easy to justify. There is also a typo in the Table showing the visual quality rating -- it presumably should be 4.5, not 44.5.

111

Appendix N, page 5-16: Increased auto/truck traffic, here and elsewhere in the Report, needs to be linked to Vividness, Intactness or Unity. Additional headlights from the traffic can be considered to increase glare, but it's not clear how the "increased visual chaos" links to the three visual characteristics being analyzed. As commented before, would traffic volumes or traffic conflicts increase even with the project to the degree that they would impair visual quality?

112

Appendix N, page 5-17: Project is characterized here as at 10% complete; page 5-20 refers to 15% complete.

113

Appendix N, page 5-16: WSDOT's Environmental Procedures Manual, Visual Quality (M31-11.01), Section VI provides that the discussion of mitigations should identify mitigating solutions that are "achievable" and "solid and binding." Statements indicating that mitigation measures are "general in nature" and "could be considerations for the project" do not appear consistent with the EPM. (Comment also applies to Appendix B, pages B-22 and B-23.)

114

Appendix N, page 5-18: The pedestrian plaza at the center of the circular ramp may be an interesting space during game days, but most of the year, and at night, it could be problematic because the potential for attracting graffiti, vandalism and other negative social elements. This could decrease activity and make it an eyesore.

115

Appendix N, page 5-19: -1st paragraph is repeated text from previous page.

116

Appendix N, page 5-21: References to views of Mt. Rainier are not discussed elsewhere in the text, such as the viewpoint analysis or the landscape unit description.

117

Response to Robert M. Powers, SDOT:

3) A decrease in intactness from 2.5 (between low and moderately low) to 2.0 (low) on a scale of 1 to 7 is not considered a marked decrease, but rather a slight decrease.

4) Along with the information above, page 5-6 of Appendix N, Visual Quality Discipline Report (Attachment 1), now notes that “The project would produce a slight to moderate increase in visual unity and a slight increase in overall visual quality. The presence of the loop ramp (with its railings and other context-sensitive details) in conjunction with the pedestrian plaza and additional street trees on the north side of South Royal Brougham Way would add to the unity of the view. This improvement would occur as a result of blocking views of the visually incongruent storage areas near the BNSF Railway tracks and along the east side of Safeco Field, adding pedestrian amenities at the plaza, and adding trees on the plaza and streets. These elements would produce a more coherent and unified visual effect, linking the two sides of South Royal Brougham Way.”

110. The existing visual quality (1.9) of Viewpoint 3 is low, as determined in compliance with the FHWA procedure for assessing visual quality. Although the project will reduce the intactness component of Viewpoint 3 from 2.0 to 1.5, the overall visual quality rating should not, based on professional judgment, be lowered further than is suggested. The reason that Viewpoint 4 had a greater decrease in overall visual quality is that Viewpoint 4 had a higher existing visual quality rating (3.9) than that of Viewpoint 3.

111. Although two street trees will be removed and additional paved surface will be seen from this vantage point, the other changes to the intersection will more than offset this visual alteration. The two street trees that will be removed from the south side of South Atlantic Street will be replaced with the same type and number of trees. In addition, the surface treatments, slightly visible in this simulation, in reality will improve the visual unity, and thus the overall visual quality, of the intersection area. The difference between an overall visual quality rating of 3.0 versus 3.2 is very minor. The overall visual quality of both ratings is considered to be moderately low. The typographical error noted on page 5-12 of Appendix N has been corrected (Attachment 1).

112. While we appreciate the reviewer’s concerns related to additional automobile and truck traffic and light impacts, the study’s authors are not aware of any FHWA-based visual assessments that have quantitatively assessed the impacts of vehicular light and glare on vividness, intactness, and unity. Rather, the descriptions of these impacts are qualitative in nature. Along South Royal Brougham Way, increased vehicular traffic (and traffic waiting at the railroad crossing) could be reasonably expected to lower existing visual quality below the ratings cited for the various viewpoints. The greater the impact (more vehicles, longer waits, etc.), the lower the visual quality scores are likely to be.

113. Page 5-20 of Appendix N, Visual Quality Discipline Report, has been revised (Attachment 1) to state that project design is at the 10 percent level at the time of EA completion.

114. Please see our response to Summary Comment 1.

115. Please see our response to SDOT Comment 109 (2).

116. The repeated text has been deleted on page 5-19 of Appendix N (Attachment 1).

117. Please see our response to SDOT Comment 102.

Page 19 of 21

- 118** APPENDIX B – BEST MANAGEMENT PRACTICES & MITIGATION MEASURES
Page B-2: There are a series of commitments within Appendix B and it would seem that these commitments should be included in the RFP documents currently being developed.
- 119** Page B-9: The EA indicates time windows for the noisiest construction. This section should state that the State and contractor will be required to follow the conditions issued on the noise permit and not limited to those conditions suggested in the EA document.
- 120** Page B-9: 4th bullet point or new bullet point should mention restrictions in the noise ordinance on use of impact equipment.
- 121** Page B-11: The City supports Option 1 for mitigating the adverse effects of contaminated soil.
- 122** Page B-13, 3rd bullet point under "Construction Mitigation": document should define "scheduled event." It should also be noted that construction traffic impacts are greatest before and after events, not during.
- 123** Page B-15, 1st sentence under "Sports and Exhibition Facilities": should reflect that construction traffic impacts are greatest before and after events, not during.
- 124** Page B-15: Last sentence under "Sports and Exhibition Facilities" should include coordination with SDOT.
- 125** Page B-15: In the section listed as Sports and Exhibition Facilities, it should list that WSDOT will also coordinate with SDOT, Seattle Police and Fire Departments.
- 126** Page B-15: In the second to last paragraph, it is important to note that the contractor in his TMP will also have to ensure compliance with the conditions of the street use permit.
- 127** Page B-17, first paragraph on page, last sentence: "Could" should be "would" since these measures are clearly needed to mitigate construction related impacts.
- 128** Page B-17, first paragraph after bullets: "WSDOT met with..." should read "WSDOT is meeting with ..." since these discussions are on-going.
- 129** Page B-17, first paragraph after bullets, last sentence: revise to reflect that mitigation is needed before and after events.

Response to Robert M. Powers, SDOT:

118. Please see our response to Summary Comment 1. The design-build construction documents will include the Mitigation Commitment List (Attachment 4).

119. The referenced text has been revised to show the correct time windows and to state that WSDOT will follow conditions issued with the temporary noise variance (Attachment 4).

120. The fourth bulleted paragraph in the referenced text has been revised (Attachment 4) to include the following statement: “The City of Seattle noise ordinance places restrictions on the use of impact equipment.”

121. Comment noted. Please see revisions to Hazardous Materials, Construction Mitigation (Attachment 4) stating WSDOT’s commitment to prepare a Spill Prevention, Control, and Countermeasure Plan prior to construction.

122. Please see our response to Summary Comment 1.

123. The referenced text has been revised (Attachment 4) to “before, during, and after.” The following sentence has been added: “Construction-related impacts on event traffic are likely to be greater before and after, rather than during, events.”

124. The referenced text has been revised (Attachment 4) to include the Seattle Department of Transportation.

125. The referenced text has been revised (Attachment 4) to include the Seattle Department of Transportation and the Seattle Police and Fire Departments.

126. The referenced text has been revised (Attachment 4) to state that “WSDOT will ensure compliance with the conditions of the City of Seattle street use permit that will be required before construction can start.”

127. The referenced text has been revised (Attachment 4) to state “will” rather than “could.”

128. The referenced text has been revised (Attachment 4) as requested.

129. The referenced text has been revised (Attachment 4) to “before, during, and after.”

Page 20 of 21

- 130 Page B-17: The bulleted list should be developed into RFP requirements and permit conditions. Again, in the second to last paragraph, the EA states that WSDOT will temporarily stop or alter construction activity during sports events at the stadiums and coordinate closely with Qwest Field Event Center to minimize traffic congestion during major exhibitions. This should also include construction activities which may cause significant noise or otherwise interfere with events in these facilities. Traffic mitigation must be in place prior to and after major time-specific events.
- 131 Page B-19, pedestrian and bicycle discussion: the Seattle Department of Transportation must be involved in such safety-related decisions as they affect City streets and sidewalks and will have to approve any such mitigation.
- 132 Page B-19: Under Event Traffic the EA states "Potential mitigation strategies during operation were discussed at a workshop with project stakeholders." These potential mitigation strategies, if greater and more detailed than what is listed, should be listed so the EA reviewers can comment.
- 133 Page B-20, first full paragraph. WSDOT should work with both King County Metro and SDOT's Traffic Operations staff to determine the appropriate location for post-event bus staging. SDOT must approve any on-street bus staging locations.
- 134 Page B-20, 3rd and 4th bullet: Add another bulleted item about drinking water supply as follows: Any shutdown of drinking water will be coordinated before, during and after the shutdown with the Seattle Public Utilities. Drinking water supply will continue without any shutdowns to commercial/industrial customers. However, if drinking water shutdowns need to occur to residential customers, it will occur only after adequate notification(s) to the residents and only for a limited time during the day.
- 135 Page B-21, 3rd bullet: before/after event issue.
- 136 Page B-22, under Operational Mitigation: the decision how the street-level access for emergency response vehicles will be provided is ultimately a City decision, since it involves City street right-of-way. See general comment #7 at beginning of letter.

Again, thank you for the opportunity to comment on this Environmental Assessment. The City remains supportive of this project and will continue to work with WSDOT,

Response to Robert M. Powers, SDOT:

130. The referenced text has been revised (Attachment 4) to state: “WSDOT will temporarily stop or alter major construction activity before, during, and after major sports events at the stadiums and major event center exhibitions, and coordinate closely with the facilities to minimize traffic congestion and construction activities that would cause loud noise or other interference before, during, and after attendance hours.”

131. The referenced text has been revised (Attachment 4) to state: “WSDOT will consult and coordinate with the City of Seattle in all safety-related decisions affecting City streets and sidewalks, and approval by the City of Seattle will be required for all such mitigation....”

132. Mitigation measures discussed at earlier stages of project development were not more detailed or more complete than those discussed in the EA. The EA represents the most recent state of project development and mitigation measures, with design at the 10 percent level.

133. The referenced text refers to project operation, when the City of Seattle will be responsible for traffic and parking management on city streets.

134. Any shutdowns of drinking water will be coordinated with the Seattle Public Utilities. If shutdowns need to occur to residential customers or commercial/industrial customers, shutdowns will occur only after adequate notification and only for a limited time. This information has been incorporated into the Public Services and Utilities, Construction Mitigation text in Attachment 4, Mitigation Commitment List.

135. The referenced text has been revised (Attachment 4) to “before, during, and after.”

136. The referenced text has been revised (Attachment 4) to state: “WSDOT is in ongoing consultation with the City of Seattle and BNSF Railway to determine, from a design standpoint, how street-level emergency access will be provided at the South Royal Brougham Way railroad crossing during project operation.”

Page 21 of 21

FHWA, other project participants and the affected neighborhoods and stakeholders to implement this project.

Sincerely,



Robert M. Powers, P.E.
Deputy Director, Seattle Department of Transportation

Cc: Mike Johnson, P.E., SDOT
Bob Chandler, SDOT
Stephanie Brown, SDOT

Kevin Callan, Washington State Major League Baseball Stadium Public Facilities District (PFD), March 7, 2008, Page 1



**WASHINGTON STATE
MAJOR LEAGUE BASEBALL STADIUM
PUBLIC FACILITIES DISTRICT**
110 Edgar Martinez Drive South
Seattle, WA 98134

Mail: P.O. Box 94445
Seattle, WA 98124
Tel: (206) 664-3076
Fax: (206) 664-3194

BOARD OF DIRECTORS

José Gaitán, Chair
Carol Nelson, Vice Chair
Charles V. "Tom" Gibbs
Dale Sperling
Joan Enticknap
Robert C. Wallace
Terrence A. Carroll

March 7, 2008

Allison Hanson, Deputy Director of Environmental Services
Urban Corridors Office
Washington State Department of Transportation (WSDOT)
999 Third Avenue, Suite 2424
Seattle, WA 98104

Re: SR 519 Intermodal Access Project Phase 2
Comments on NEPA Environmental Assessment
Comments on SEPA Determination of Nonsignificance
and Adoption

Dear Ms. Hanson:

The Washington State Major League Baseball Stadium Public Facilities District (PFD) appreciates the opportunity to review and comment on the NEPA Environmental Assessment and the SEPA determination of nonsignificance (DNS) for WSDOT's SR 519 Intermodal Access Project Phase 2. The PFD is the public entity that developed and now owns the ballpark known as Safeco Field. The PFD is responsible for overseeing this public asset and for ensuring that the public investment in Safeco Field is not compromised.

The PFD has supported the development of the SR 519 Intermodal Access project since the PFD's creation in 1995, and the PFD was one of the project's first financial contributors. Our experience with WSDOT during the development and construction of phase 1 of the project gives us confidence that phase 2 can be constructed in a manner that minimizes significant impacts on Safeco Field and its tenant the Seattle Mariners. But minimizing construction and operational impacts will require continued close coordination between the PFD, WSDOT, and all of the other parties with an interest in this area. We believe that such coordination is possible, and we look forward to continuing to work with WSDOT on the project's implementation.



PFD Comment Letter on SR 519 Phase 2 EA and DNS

March 7, 2008

Page 2 of 6

Safeco Field is located literally at the center of phase 2 of the SR 519 project. Construction activities will occur right outside of our signature home plate entrance and along all four sides of the ballpark. Without careful coordination and appropriate mitigation, access to and from Safeco Field and the operations of the ballpark will likely be significantly affected by phase 2 of the SR 519 project.

Potential mitigation measures are identified in the Environmental Assessment (EA) and adopted by the DNS. We write to emphasize the importance of implementing all of these measures and the additional measures that we identify below so that the impacts of the phase 2 project do not cross the NEPA/SEPA threshold of significance. We also request that the PFD be consulted and made a part of the mitigation planning and implementation process, and that a specific list of mitigation measures be adopted for the project.

1

For phase 1 of the SR 519 project, the PFD, Mariners, and WSDOT entered into a construction, operation, and maintenance agreement that included specific details regarding the timing of construction activities relative to events at Safeco Field, construction standards for different elements of the phase 1 project, and different approaches to work during the baseball season and during the off-season. All of the elements in that agreement helped to ensure that phase 1 project impacts were minimized and that the construction activities did not interfere with event activities at Safeco Field. We expect to enter into a similar agreement for the phase 2 construction. Without such an agreement, we are concerned that construction impacts on Safeco Field will be significant.

2

The comments below follow the order of the comments the PFD made during the scoping process for the environmental assessment (June 2007). During scoping, we made it clear that certain impacts needed to be analyzed and mitigated in order to avoid significant adverse impacts. If these elements are not appropriately mitigated, then the impacts of the phase 2 project will likely be significant and an environmental impact statement must be prepared.

- **Pedestrian and Fan Safety:** In our scoping comments we expressed concerns about pedestrian and fan safety at several locations around the ballpark. The EA acknowledges those problem areas: the north side of South Atlantic Street at the I-90 off-ramp terminus; the western end of the proposed elevated structure along South Royal Brougham Way; and the intersection of First Avenue South and South Atlantic Street. (See EA, p. 5-115 "safety issues" and pp. 5-129 to 5-134). We agree with the mitigation measures suggested on p. 5-134 of the EA, and we believe that all of these measures must be implemented if significant impacts are to be avoided. We ask that WSDOT also consider "delayed" signaling at all of these intersection locations to provide for pedestrian crossings. In addition, for the First and Atlantic Street area, WSDOT should consider

3

4

Response to Kevin Callan, PFD:

1. Please see our response to Summary Comment 1. WSDOT will take the necessary measures to prevent any effect of the project from crossing a NEPA or SEPA threshold of significance. WSDOT will consult the Public Facilities District during the mitigation planning and implementation process.
2. WSDOT will convene a Maintenance of Traffic Task Force (MOTTF) which will include the PFD and the Seattle Mariners. The MOTTF will serve as the coordinating mechanism during the SR 519 Phase 2 design-build process to ensure that construction activities are planned, scheduled, and implemented in ways that minimize adverse effects on stadium area facilities and events.
3. Please see our response to Summary Comment 1. The Public Facilities District will be a member of the MOTTF and will participate in the development of the traffic management plan.
4. The Seattle Police Department controls traffic and pedestrian movement during the periods preceding, during, and following events at the stadiums and event center. Existing signal timing will be maintained at intersections with traffic signals.

PFD Comment Letter on SR 519 Phase 2 EA and DNS
March 7, 2008
Page 3 of 6

5 additional capital improvements, including a pedestrian overcrossing over the roadway, if pedestrian/traffic conflicts cannot be mitigated by implementing other measures.

• **Transportation, Traffic Circulation, and Vehicle Access:** The transportation section notes that project construction could have adverse effects on traffic and transportation conditions in the study area. The PFD believes that these construction impacts on Safeco Field could be significant, absent appropriate mitigation. The EA identifies the preparation of a construction management plan—with provisions for traffic management—as a potential mitigation measure. The PFD believes that the development of such a plan is essential in order to avoid significant impacts on Safeco Field events and operations.

6 The EA states that WSDOT intends to meet with representatives from the PFD (and other stakeholders) to "plan and coordinate the management of event traffic and parking" in the area during construction. We appreciate that outreach and add that the PFD (and our tenant, the Seattle Mariners) must expressly be identified as a participant in the development process for the construction management plan, and that the PFD/Mariners must be consulted and included in the discussion of all project lane closures and detours affecting Safeco Field. Without such participation, the PFD believes that the impacts on Safeco Field could be significant and an environmental impact statement should be required.

7 • **Metro Bus Staging:** The PFD agrees that the impacts of project construction and operation on parking supply could be mitigated by encouraging the use of alternative transportation modes, "such as providing special event bus service and staging space" (EA, p. 5-133). In our scoping comment letter, we suggested that the former Fisher/Rittenburg properties, which are owned by WSDOT, be evaluated as a potential bus staging area. In order to mitigate project impacts, WSDOT should grant permanent easements to the PFD to allow for transit bus staging on the former Fisher/Rittenburg properties.

8 • **Construction Impacts:** We appreciate the identification of construction impacts throughout the EA, and the mitigation measures proposed to address those impacts. Many of these mitigation measures constitute best management practices (BMPs) and will most likely be part of any bid package. Others, however, are expressed as optional measures, or they are stated in the alternative. WSDOT should make clear in a separate mitigation document or in FHWA's finding of no significant impact (FONSI) which mitigation measures are expressly being required as part of the project.

Response to Kevin Callan, PFD:

5. The project improvements at the intersection of First Avenue South and South Atlantic Street will improve the flow of traffic and allow pedestrians to cross the intersection safely. The impact analysis did not identify any adverse effects that would warrant a pedestrian overcrossing. The Seattle Police Department controls pedestrian traffic before, during, and after events at the stadiums and event center. No additional capital improvements are planned at the intersection of First Avenue South and South Atlantic Street.
6. WSDOT will prepare and implement a traffic management plan to minimize adverse effects of project construction on traffic and transportation conditions in the study area.
7. It is WSDOT's express intent that the Public Facilities District and Seattle Mariners will be members of the MOTTF and will participate in developing the traffic management plan and other elements of construction planning.
8. The traffic management plan will be developed in consultation and coordination with local agencies, including King County Metro Transit. This consultative process will be used to develop strategies and procedures to minimize the construction effects, including those on bus staging. Post-construction traffic management on Seattle city streets, including bus layover and staging, will be the responsibility of the City of Seattle. Therefore, post-construction impacts to bus staging do not warrant the use of WSDOT properties. However, if WSDOT properties were identified as possible staging areas, WSDOT would discuss those possibilities with the appropriate agencies at that time.
9. Please see our response to Summary Comment 1.

PFD Comment Letter on SR 519 Phase 2 EA and DNS
March 7, 2008
Page 4 of 6

- **Visual Quality / Urban Design:** We have met with WSDOT staff and the consultant team and have been briefed on the urban design elements of the project. We are very pleased with all of the effort that has gone into making the SR 519 phase 2 roadway fit well within its context, including its relationship with Safeco Field. We will review the second draft of the Context-Sensitive Design Criteria and will comment separately on those criteria. Our concern is this: The Visual Quality analysis in the EA concludes that impacts on visual quality will be "minor" (p. 5-147), because the project design will be consistent with the existing character of the study area, including Safeco Field. While we agree with that assessment, it turns on the project being constructed consistent with the design concepts evaluated in the EA. Our concern arises if the design/build process being used for the phase 2 project allows for substantial deviations from the design concepts evaluated in the EA and presented to the stakeholders. If that occurs, the impacts on visual quality could be significant and supplemental environmental review (or an EIS) could be required.
- 10
- **Safety / Security / Public Service Impacts:** Our scoping comments expressed concern about the covered area that will be created along South Royal Brougham Way by the construction of the overhead roadway. The Second Draft of the Context Sensitive Design Criteria recognizes the importance of under-structure lighting and the need for this area to be brightly lit (See Design Criteria, p. 33). The PFD believes that these lighting criteria should be a required mitigation measure for the project.
- 11
- **Light and Glare:** Our scoping comments expressed concerns regarding the impacts of glare and spillover from street lighting along the Royal Brougham Way overcrossing, given the location of those lights relative to home plate and the "batter's eye." While the EA does not directly acknowledge these impacts, we believe that appropriate mitigation would require the use of full (or partial) cut-off lights and light shielding where necessary to eliminate light spill-over.
- 12
- **Vibration Impacts:** Vibration impacts from construction activities and measures to mitigate those impacts are identified throughout the EA (see, e.g., EA, p. 5-9 "intermittent ground vibration from heavy equipment operation" and p. 5-17 "ground vibration mitigation measures." The PFD believes that all of these mitigation measures should be implemented in order to avoid significant adverse impacts on ballpark scoreboards and other sensitive electronic devices.
- 13
- **Cumulative Impacts:** As we noted in our scoping letter, the SR 519 phase 2 project will be constructed during a period of unprecedented building activity in the South Downtown area. No specific mitigation measures are
- 14

Response to Kevin Callan, PFD:

10. Although the design-build process does allow for innovation, WSDOT will meet the commitments stated in the EA regarding urban design and visual quality, and we will keep stakeholders, including the Public Facilities District, informed throughout design and construction of the project improvements.

11. WSDOT will ensure that the under-structure lighting criteria along South Royal Brougham Way will be met. EA page 5-141 (Attachment 1) and the Mitigation Commitment List (Attachment 4) have been revised to incorporate this commitment.

12. Street lighting on the South Royal Brougham Way elevated structure will not be high enough to be seen from Safeco Field home plate. WSDOT will install light shielding for street lights that can be seen from other locations in or near the playing field.

13. Please see our response to Summary Comment 1. WSDOT will ensure that vibration impacts from construction activities will be mitigated.

14. Please see our response to Summary Comment 1 on page A5-2. WSDOT is committed to continued stakeholder input and involvement throughout the design-build process.

PFD Comment Letter on SR 519 Phase 2 EA and DNS
March 7, 2008
Page 5 of 6

outline for responding to these cumulative impacts, but the EA notes that the individual measures outlined for each element of the environment will help reduce cumulative impacts. We agree, and we note that mitigation measures that allow for readjustment as the project proceeds—such as the construction management plan—are likely to produce better results in reducing cumulative impacts. The PFD strongly supports mitigation measures that include continued stakeholder input and involvement.

- **Geology and Soils:** The EA notes that soil fills added to an area can produce compression zones that extend well beyond the area of the fill (EA, p. 5-13). This is of particular concern to the PFD for the fill area along the western portion of the roadway located along South Royal Brougham Way. While much of the ballpark and roof structure is pile-supported, additional lateral loads on the ballpark foundation and structure could create alignment problems and other significant impacts. These impacts may be mitigated using the techniques identified in the EA, but appropriate measures must be undertaken to avoid any adverse loading impacts on Safeco Field.

15
16a Finally, we have some concerns about the timing of WSDOT's SEPA determination of nonsignificance for the project. We agree with WSDOT that it may be appropriate to adopt the NEPA EA as an expanded SEPA environmental checklist for the project. But we are concerned that the issuance of a SEPA DNS before mitigation conditions are firmly established as part of the Final EA/FONSI process may raise questions about what mitigation measures (if any) are required.

16b We believe that this situation can be remedied by having WSDOT modify the DNS (following the close of the comment period) to indicate with specificity the mitigation measures to be included as part of the phase 2 project. (See WAC 197-11-340(2)(f)). Another approach would be for WSDOT to clarify, change, or condition the proposal to include the appropriate mitigation measures, and retain the DNS. (See WAC 197-11-350(3)). As the SEPA rules note, "environmental documents need not be revised and resubmitted if the clarifications or changes are stated in writing in documents that are attachments to, or incorporate by reference, the documents previously submitted." WAC 197-11-350(4).

16c In short, the PFD recommends that the mitigation commitments applicable to the SR 519 phase 2 project be clarified and that a specific list of mitigation measures be adopted for the project. That list should then be incorporated into the project elements (e.g., by making the mitigation measures a required element in the design/build RFP), or the mitigation list should be attached to or incorporated by reference into the environmental documents previously submitted.

Response to Kevin Callan, PFD:

15. The potential for lateral movement of the soil from the new roadway embankments will be evaluated relative to the location of the pile supports for the roof structure. Although the effects of lateral movements are expected to be localized, if final design determines that a risk exists to the foundation supports to the stadium, mitigation methods will be implemented as discussed in our response to Seattle Mariners Comment 2.

16a and 16b. The NEPA EA satisfies the SEPA requirement for completion of the SEPA Checklist. Based on the comments received on the EA, WSDOT does not anticipate reissuing the Determination of Nonsignificance (DNS) for the project. WSDOT will not issue the Notice of Action Taken (NAT) until appropriate revisions have been made to the EA.

16c. Please see our response to Summary Comment 1. WSDOT will ensure that development and implementation of BMPs and appropriate mitigation measures will be a required part of the design-build process.

PFD Comment Letter on SR 519 Phase 2 EA and DNS
March 7, 2008
Page 6 of 6

We conclude by noting that the Seattle Mariners have submitted a separate comment letter. The PFD has reviewed that comment letter and joins in the concerns and issues raised by the team.

The continued success of Safeco Field turns in large part on our baseball fans' and other event patron's ability to access our facility and enjoy events. The PFD understands that facility access may be affected during construction of the SR 519 phase 2 project, but we believe that if we work together on mitigation planning and implementation, the impacts of construction can be reduced so that they are not significant and no environmental impact statement is required.

Again, we appreciate the opportunity to comment. We look forward to seeing the final list of mitigation measures adopted for this project, and we look forward to working with WSDOT and the consultant team as this important project proceeds. If you have any questions, please give us a call at (206) 664-3076 or (206) 767-7800.

Sincerely,



Kevin Callan, Executive Director

Cc: PFD Board Members
Tom Backer, Legal Counsel
Bart Waldman, Seattle Mariners
Susan Ranf, Seattle Mariners



King County

Department of Transportation

201 South Jackson Street
Seattle, WA 98104-3856

March 10, 2008

Allison Hanson, Deputy Director of Environmental Services
Washington State Department of Transportation
999 Third Avenue, Suite 2424
Seattle, WA 98104

Re: SR 519 Intermodal Access Project Phase II – Environmental Assessment

Dear Ms. Hanson:

Thank you for the opportunity to comment on the Environmental Assessment (EA) for the SR 519 Phase II Intermodal Access, Royal Brougham Project. In addition to our specific comments on the EA, please refer to our previous letter of June 13, 2007 (attached) when we provided comments on the scoping of this effort. Our review of the EA was done as follow-up to that earlier letter.

As you know, this project may have significant impacts on King County Metro Transit's ability to provide reliable and satisfactory bus service from its Ryerson Bus Base, along the E-3 Busway, and on surface streets in the immediate area. We recognize the importance of SR 519 and related projects to the overall mobility in the area surrounding the Port, stadiums and South Seattle. King County Metro remains fully committed to working cooperatively with the Washington State Department of Transportation to complete SR 519 while continuing to operate bus service during the construction period.

Attached is a list of our specific comments and associated measures necessary to appropriately mitigate them. Our staff is available for further clarification during the incorporation of these comments in the Finding of No Significant Impact (FONSI).

Thank you for coordinating with us on the development of the SR 519 EA. We look forward to continued participation in the planning, staging, and design of this important project.

Sincerely,

Harold S. Taniguchi
Director, King County Department of Transportation

Attachments: 1) Comments and Suggested Mitigation Commitments
2) June 13, 2007 letter to Kate Stenberg, WSDOT

cc: Ron Posthuma, Assistant Director, Department of Transportation (DOT)
Kevin Desmond, General Manager, Metro Transit Division (MTD), DOT
Jim Jacobson, Deputy General Manager, MTD, DOT
Judy Riley, Manager, Transit Design and Construction, MTD, DOT
Gary Kriedt, Environmental Planner, Transit Design and Construction, MTD, DOT



MOBILITY FOR THE REGION



Specific Comments and Suggested Mitigation Commitments

Below is a discussion of impacts that King County Metro Transit is particularly concerned about. Suggested mitigation commitments that should be incorporated in the FONSI (or Request for Proposals as appropriate) are in **bold**.

1a Ryerson Base Impacts – The design of the structure passing over the base will result in a permanent reduction of our coach parking capacity and also negatively impact internal base coach circulation. The structure columns restrict vision which is a safety concern. The superstructure may block existing yard lighting which will have to be mitigated to ensure adequate light levels for safe nighttime operation.

1b The temporary easement area will displace approximately 64 coaches during the period of construction. These coaches will have to be parked and maintained at our Atlantic Central Base at an additional cost.

Mitigation will require purchase, in accordance with State and County regulations and policies, of property rights, construction easements and air space leases. The contract(s) for design and construction must include specific restrictions and conditions, established through negotiation

1c **between King County Metro and WSDOT, to ensure safety and minimize short and long term disruption to Transit operations. Based on a six-month construction duration, design alternatives must consider the impact to the construction schedule and the length of time Ryerson Base will be disrupted. King County Metro will be compensated for at least \$500,000 in additional operating costs.**

1d **WSDOT will keep King County Metro informed of the design as it progresses, and, through careful and timely coordination; will involve King County Metro as a partner in the design team and Transportation Task Force to assist in minimizing impacts and to ensure that any actual impacts have been satisfactorily addressed and minimized.**

2a E-3 Busway, 4th Avenue South and South Royal Brougham Way Construction Impacts – Traffic analyses in the EA indicate that there will not be any significant Level of Service (LOS) reductions on these critical streets during the construction period. As you know, traffic flow on these roads is critical to our bus service. The E-3 Busway and South Royal Brougham Way are essential streets for all buses using the Downtown Seattle Transit Tunnel. The E-3 Busway is the only access route for all coaches accessing Ryerson Base. 4th Avenue South handles a high volume of bus service and includes bus stops that serve the stadiums. We also have routes and bus stops on 1st Avenue South.

2b We are unable to determine from the report whether there will be periods when temporary or extended closure of these routes may be necessary for certain construction activities.

2c **If roadway closures are necessary, mitigation will be essential to ensure that transit service can be sustained with minimum disruption. To mitigate this, there must be certain requirements included in the construction contract. WSDOT will also establish and adhere to specific procedures to ensure these requirements are met. These requirements include but are not limited to the following:**

- **Communication points of contact will be established for WSDOT and King County Metro staff. All project communication during design and construction is to be through these personnel.**
- **King County Metro must be informed of anything that will affect transit service; but anything that affects general purpose or pedestrian traffic service may also have an indirect impact on transit, so King County Metro should be informed of these changes as well. King County Metro can supply the Task Force or contractor locations of bus**

Response to Harold S. Taniguchi, King County Department of Transportation:

1a. The following statement has been incorporated into the discussion of project operational effects on the Ryerson Bus Base on EA page 5-133 and to Attachment 4, Mitigation Commitment List: “WSDOT will install appropriate lighting to offset blockage of Ryerson Bus Base nighttime illumination by the elevated I-90 off-ramp if such blockage occurs.”

1b. WSDOT and King County Metro Transit are in ongoing discussions with regard to avoiding or minimizing impacts on the Ryerson Bus Base.

1c. Please see our response to King County Comment 1b above.

1d. WSDOT is committed to working with King County Metro Transit in developing the traffic management plan and as a member of the MOTTF.

2a. WSDOT recognizes the importance of these roadways to bus service and will continue to coordinate with King County Metro Transit to ensure that there are no significant level-of-service reductions on these streets during project construction.

2b. WSDOT will coordinate with King County Metro Transit regarding temporary street closures that affect its operations, including the E3 Busway.

2c. Please see our response to Summary Comment 1. In consultation with King County Metro Transit and other stakeholders, WSDOT will prepare a traffic management plan that will include communication with King County, the City of Seattle, and other appropriate agencies regarding advance notification of detours, hours of lane closures, and related matters.

zones/layovers, in-service and deadhead routes, base access points, trolley work, and any other significant pieces of transit infrastructure.

- To close a bus stop or access to a bus stop, or to remove a shelter, the design/build contractor will notify the King County Metro Transit Construction Coordinator (CC) at least 10 business days in advance. Also, if street or shelter lighting will be turned off during any hours of darkness, notify Metro's CC.
- To close any on-street bus layover space, the design/build contractor will notify Metro's CC at least 10 business days in advance.
- Access to or from the bus tunnel at the E-3 Busway & South Royal Brougham Way cannot be closed between the hours of 4:30 AM to 7:00 PM.
- To close access to or from the E-3 Busway, the design/build contractor will notify Metro's CC at least 10 business days in advance. Lane closures on the E-3 Busway will be allowed from 9 AM to 3 PM on weekdays or nights after 7 PM until 4 AM. Weekend full closures will be considered with 10 business days notification.
- Access to/from Ryerson base to the E-3 Busway cannot be closed. This access must be maintained 24/7 for both transit and emergency response vehicles.
- South Royal Brougham Way will not be closed before 7 PM and after 4 AM on weekdays. South Royal Brougham Way can be closed on weekends with notification to Metro's CC at least 10 business days in advance.
- 4th Avenue South and the E-3 Busway cannot be closed at the same time.
- Notify Metro's CC at least 10 business days in advance of any proposed closures of travel lanes, including partial lane closures, or any prohibitions of travel movements. This includes notification if reducing any turn radius for bus turning movements.
- Notify Metro's CC at least 10 business days in advance of any proposal to turn off power that will affect trolley operations. If power to trolley lines is proposed to be off for an extended period of time, this needs to be coordinated with Metro's Power & Facilities Section and the CC, but trolley service must be maintained week days, Monday through Friday, between the hours of 4 AM and 2 AM the following morning.
- Submit traffic control plans and schedules, plus proposed E-3 Busway or road closures, to King County Metro Transit Design and Construction Section 10 business days in advance; requires approval by Metro's CC.
- Notify Metro's CC of any proposed closures of Atlantic Street overpass ramps. Access to I-90/I-5 will need to be maintained for both the north end and the south end of the structure.
- WSDOT may need to provide extra traffic control during construction on days where there are special or sporting events.
- Notify and coordinate with SDOT Signal Operations Section and King County Metro's Transit Speed and Reliability Section regarding any proposed impacts to the signal communication line between 4th Avenue South and I-90 Touchdown and 4th Avenue South and South Royal Brougham Way (we have transit signal priority at 4th Avenue South and South Royal Brougham Way for the southbound left turns).
- Do not impact intersection or traffic signal operations (shifting/reducing lanes, destroying detection, etc.) without coordinating with SDOT Signal Operations.

3a

Area Storm Drainage – The EA does not indicate whether there is likely to be a significant change in the way surface water is collected in vicinity of E-3 and Ryerson Base, whether the ramp design will cause any problems with the Ryerson and Busway storm drainage facilities, or whether there are any adverse

Response to Harold S. Taniguchi, King County Department of Transportation:

3a. The project will not cause any change to the existing stormwater collection systems associated with the E3 Busway and Ryerson Bus Base. The new I-90 off-ramp to South Atlantic Street will intercept some of the rainfall that currently falls onto the Ryerson Bus Base and convey the resulting runoff to another location. Thus the project will reduce the amount of runoff that will be collected and treated by the existing stormwater management system serving the bus base, resulting in a beneficial effect.

cumulative effects due to the project with regard to stormwater. Changes to the stormwater system could require changes to the GM 1387 drainage agreement which would need to be modified through negotiation.

3b **If there is a change in the way surface water is collected at Ryerson Base, WSDOT will coordinate closely with King County. Any changes in maintenance or ownership requirements will be identified and resolved by negotiation and the three-party GM 1387 drainage agreement will be modified accordingly.**

4a Loss of Layover and Staging for Stadium Events – The loss of bus layover and staging for stadium events is a very significant impact, which is acknowledged in the Transportation Discipline Report. There is no mention of this in the main body of the EA. Special event bus service for major stadium events is a critical component of the traffic management strategy during those events. The availability of alternative suitable staging sites is severely limited; nearby state-owned right-of-way might play a role in accommodating new staging locations.

4b **WSDOT will ensure that replacement layover for stadium event bus service will be provided, both during and after construction. The new layover shall be satisfactory to both King County Metro and the City of Seattle.**

5a Schedule Coordination with Other Projects – In summer 2008, King County Metro will begin a major renovation of Ryerson Base which will be completed in September 2009. WSDOT has been aware of this since early in the EA scoping phase. Our objective has been to expedite completion of that work.

5b **Construction of SR 519 on Ryerson base can not begin until September, 2009. They will begin construction of SR 519 off of the base this fall.**

5c The EA states that SR 519 construction on the base will begin in the 2nd quarter of 2010. However, WSDOT staff has indicated that the start date may have changed. We reiterate that ramp construction during renovation is not feasible and cannot begin until the Ryerson Base renovation project is done.

6 Light Rail Operations -- Sound Transit and King County are preparing for the start of Light Rail operations on the E-3 and through the Downtown tunnel; the SR 519 schedule is a concern with regard to potential disruption of those operations.

The SR 519 construction schedule must be closely coordinated with Sound Transit and King County to avoid adverse impacts to Light Rail.

Response to Harold S. Taniguchi, King County Department of Transportation:

3b. Please see our response to King County Comment 3a.

4a. The traffic management plan will be developed in consultation and coordination with King County Metro Transit, the Seattle Department of Transportation, Seattle Police Department, and Seattle Fire Department. This consultative process will be used to develop strategies and procedures to minimize the effects of project construction on bus layover and staging before, during, and after major events at the stadiums and event center. This statement has been added to the transportation mitigation discussion on EA page 5-132 (Attachment 1) and to the same text in the Mitigation Commitment List (Attachment 4).

4b. The traffic management plan will cover events during construction. Post-construction traffic management on Seattle city streets, including bus layover and staging, will be the responsibility of the City of Seattle.

5a. EA page 5-125 has been revised (Attachment 1) as follows: “To avoid interference with the ongoing King County Metro Transit capital improvement project at Ryerson Bus Base, WSDOT will not enter the Ryerson Bus Base to start construction of the new I-90 off-ramp until September 2009, which is after Sound Transit’s Central Link light rail line is operational. WSDOT will continue to coordinate with Sound Transit and King County Metro Transit to minimize impacts on their operations.”

5b. Comment noted. Please see our response to Comment 5a.

5c. Comment noted. Please see our response to Comment 5a.

6. WSDOT will continue to coordinate with Sound Transit and King County Metro Transit to minimize impacts on their operations.



**King County
Department of Transportation**
201 South Jackson Street
Seattle, WA 98104-3856

Kate Stenberg
Environmental Manager
Washington State Department of Transportation
SR 519 Intermodal Access Project
999 Third Avenue, Suite 2424
Seattle, WA 98104

June 13, 2007

Dear Ms. Stenberg:

Thank you for the opportunity to comment on the scope of the Environmental Assessment (EA) on the SR 519 Phase II, Intermodal Access, Royal Brougham Project. King County appreciates the Washington Department of Transportation's (WSDOT) efforts to move this project forward and to identify viable solutions to mobility and access problems in the area. We understand that some project details are being worked out and will be addressed further in the forthcoming EA. These comments reflect suggestions from the King County Department of Transportation (KCDOT).

We believe the project area is important for the overall mobility of freight entering and exiting the port, general purpose traffic traveling through Seattle, transit traveling in and out of Ryerson Bus Base and traveling through the south end of Seattle, and pedestrians connecting to the stadiums. Since this area is such a critical link for traffic traveling in Seattle, we believe that it will be very important to time this project with other construction projects in the area to ensure mobility for all modes of transportation.

Transit Impact:

The SR 519 ramp structure has a direct impact on Metro Transit's Ryerson Bus Base, and we would like assurance that Metro staff will be involved in the process of refining project details. Base operations will be heavily impacted, especially during construction, and we ask that your EA include a thorough analysis of those impacts plus appropriate mitigation measures and costs. Besides the permanent loss of bus parking spaces, impacts include base access (both within the base and on the street), temporary displacement of bus routes and layover locations, and other impacts.

In addition to an analysis of Ryerson Base impacts, the EA needs to include a complete analysis of overall traffic and circulation impacts in the area, during and after construction. This should include data on bus circulation, transit employee vehicle circulation, bus turning radii, impacts to bus zones, and the potential need for transit priority measures if SR 519 is used as a bus rapid transit corridor during the Alaskan Way Viaduct (AWV) project

MOBILITY FOR THE REGION

Kate Stenberg
June 13, 2007
Page 2

construction. We will provide you with information on current bus and employee circulation patterns to help you with that analysis. Key concerns include minimizing delays to transit, especially during stadium events, and optimizing bus circulation and access related to Ryerson Base.

This project presents an opportunity to provide post-game bus loading areas and before-game drop offs on Royal Brougham, with direct access to and from the freeways (or for other special events at Qwest Field and Event Center, and Safeco Field).

For transit related information please work with our main point of contact, Ron Moattar, Project Manager, (206-684-2081, ron.moattar@metrokc.gov), while refining details and developing your analysis.

Pedestrian Access:

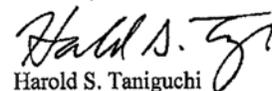
The project should consider a pedestrian crossing bridge over the south leg of Royal Brougham & 4th Ave S to eliminate at grade pedestrian crossing of 4th Ave S, a major source of vehicular delays.

Construction Impacts:

As stated earlier, we are concerned about the cumulative impacts of this and other projects in the SODO area if they are not sequenced effectively to minimize traffic impacts. We believe that a fast and reliable transit corridor through the SODO area is critical, especially during the construction of the AWV project. We look forward to ongoing discussions of SR 519 project timing in our collaborative viaduct construction process.

Thank you again for the opportunity to comment on the SR 519 project. KCDOT is very interested in assisting with planning related to the several major capital projects that are planned for the area in the coming years. Please note, that King County Department of Natural Resources and Parks Wastewater Treatment Division also provided comments on May 30. If you have questions or need further information relating to these comments, please contact Ron Posthuma, Assistant Director, KCDOT, at 206-684-1007 or ron.posthuma@metrokc.gov.

Sincerely,



Harold S. Taniguchi
Director, King County Department of Transportation

cc: Laurie Brown, Deputy Director, King County Department of Transportation (KCDOT)
Ron Posthuma, Assistant Director, KCDOT
Kevin Desmond, General Manager, Metro Transit Division (MTD), KCDOT
Victor Obeso, Manager, Service Development, MTD, KCDOT
Doug Hodson, Policy and Government Relations Liaison, KCDOT

This page intentionally left blank.